CITY OF CAMPBELL

1700 Dell Avenue Office Development Draft EIR

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PLACEWORKS

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1. Executive Summary

This chapter presents an overview of the proposed 1700 Dell Avenue Office Development project (project or proposed project). This executive summary also provides a summary of the alternatives to the proposed project, identifies issues to be resolved, areas of concern, and conclusions of the analysis contained in Chapters 4.0, Environmental Analysis, and each subchapter (Chapters 4.1 through 4.14) of this Draft Environmental Impact Report (Draft EIR). For a complete description of the proposed project, see Chapter 3, Project Description, of this Draft EIR. For a discussion of alternatives to the proposed project, see Chapter 6, Alternatives to the Proposed Project, of this Draft EIR.

This Draft EIR addresses the environmental effects associated with approval, construction, and operation of the proposed project. 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, local, and State governmental agency decision-makers with an analysis of potential environmental consequences to support informed decision-making.

This Draft EIR has been prepared pursuant to the requirements of CEQA[1] and the State CEQA Guidelines[2] to determine if approval of the identified discretionary actions and related subsequent development could have a significant effect 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 reports. Information for this Draft EIR was obtained from on-site field observations; discussions with public service 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, hazards and hazardous materials, noise, and transportation and traffic).

1.1 ENVIRONMENTAL PROCEDURES

This Draft EIR has been prepared to assess the environmental effects associated with development of the proposed project. The main objectives 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.

[1] The CEQA Statute is found at California Public Resources Code, Division 13, Sections 21000 to 21177.
[2] The CEQA Guidelines are found at California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 to 15387.

- To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
- To foster interagency coordination in the review of projects.
- To enhance public participation in the planning process.

An EIR is the most comprehensive form of environmental documentation identified in the CEQA Statute 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 has 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 EIR ORGANIZATION

This Draft EIR is organized into the following chapters:

- Chapter 1: Executive Summary. This chapter summarizes the environmental consequences that would result from implementation of the proposed project, the alternatives to the proposed project, the recommended mitigation measures, and indicates the level of significance of environmental impacts with and without mitigation.
- Chapter 2: Introduction. This chapter provides an overview describing the Draft EIR document.
- Chapter 3: Project Description. This chapter describes the proposed project in detail, including the characteristics, objectives, and the structural and technical elements of the proposed action.
- Chapter 4: Environmental Analysis. This chapter is divided into 14 sub-chapters corresponding to the environmental resource categories identified in CEQA Guidelines Appendix F, Energy Conservation, and Appendix G, Environmental Checklist, as amended per Assembly Bill 52 (Tribal Cultural Resources) and the California Supreme Court in a December 2015 opinion [*California Building Industry Association (CBIA) v. Bay Area Air Quality Management District (BAAQMD)*, 62 Cal. 4th 369 (No. S 213478)]. This chapter provides a description of the physical environmental conditions in the City of Campbell, 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 project, and recommended mitigation measures, if required, to reduce their significance. The environmental setting included in each subchapter provides baseline physical conditions from which the City of Campbell acting as the lead agency determines the significance of environmental impacts resulting from the proposed project. Each subchapter 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 project; and the potential cumulative impacts associated with the proposed project.

- Chapter 5: Significant Unavoidable Impacts. This chapter lists the significant impacts that cannot be mitigated to a less-than-significant level.
- Chapter 6: Alternatives to the Proposed Project This chapter includes an evaluation of three alternatives to the proposed project, which are the CEQA-required "No Project" Alternative, the Existing Zoning Alternative, and the Reduced Intensity Alternative.
- Chapter 7: CEQA Mandated Assessment. This chapter includes a discussion of impacts found not to be significant, growth inducement, and significant irreversible changes as a result of approval and implementation of the proposed project.
- Chapter 8: Organizations and Persons Consulted. A list of people and organizations that were contacted during the preparation of this Draft EIR for the proposed project is included in this chapter.
- Appendices: The appendices for this Draft EIR (presented in portable document file [PDF] format attached to the back cover) contain the following supporting documents:
  - Appendix A: Notice of Preparation (NOP) and Scoping Comments
  - Appendix B: Air Quality and Greenhouse Gas Emissions Data
  - Appendix C: Health Risk Assessment
  - Appendix D: Arborist Report
  - Appendix E: Geotechnical Investigation
  - Appendix F: Phase I Environmental Site Assessment
  - Appendix G: Hydrology and Water Quality
  - Appendix H: Technical Noise Data and Modeling
  - Appendix I: Transportation Impact Study

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.*

This Draft EIR has been prepared as a project EIR, pursuant to Section 15161 of the CEQA Guidelines. As a project EIR, the environmental analysis will discuss the changes in the environment that would result from the development of the Dell Avenue Office Development project. This project EIR will examine the specific short-term impacts (project construction) and long-term impacts (project operation) that would occur as a result of project approval by the City of Campbell, as well as cumulative impacts.

1.2 SUMMARY OF PROPOSED PROJECT

The proposed project would redevelop the project site with a 161,870 square foot four-story office building, a 146,478-square-foot five-story parking garage, additional surface parking, and a 9,511-square-foot on-site public open space area at 1700 Dell Avenue. The proposed project would also require a zone change to rezone the property from C-M to Planned Development (P-D).

1.3 SUMMARY OF PROJECT ALTERNATIVES

This Draft EIR analyzes alternatives to the proposed project that are designed to reduce the significant environmental impacts of the proposed project and feasibly attain some of the proposed project objectives. There is no set methodology for comparing the alternatives or determining the environmentally superior alternative under CEQA. Identification of the environmentally superior alternative involves weighing and balancing all of the environmental resource areas by the City. The following alternatives to the proposed project were considered and analyzed in detail:

- No Project Alternative
- Existing Zoning Alternative
- Reduced Intensity Alternative

Chapter 6, Alternatives to the Proposed Project, 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 ISSUES TO BE RESOLVED

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 project, 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 project;
- whether the benefits of the proposed project override those environmental impacts that cannot be feasibly avoided or mitigated to a level of insignificance;
- whether the identified mitigation measures should be adopted or modified; and
- whether there are any alternatives to the proposed project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic objectives.

1.5 AREAS OF CONTROVERSY

The City issued a Notice of Preparation on July 1, 2018 and held a scoping meeting on July 10, 2018 to receive scoping comments. During the 30-day scoping period for this EIR, which concluded on July 31,

2018, responsible agencies and interested members of the public were invited to submit comments as to the scope and content of the EIR. While every environmental concern applicable to the CEQA process is addressed in this Draft EIR, this list is not necessarily exhaustive; rather, it attempts to capture those concerns that are likely to generate the greatest interest based on the input received during the scoping process. The comments received focused primarily on the following issues; the chapters in which these issues are addressed are indicated in parentheses:

- Air quality and nonattainment standards. (Chapter 4.2, Air Quality)
- Potential impacts to bird species, including the potential effects of lighting, and reflective windows on bird populations and the riparian corridor. (Chapter 4.3, Biological Resources)
- The conformance of landscaping with applicable guidelines. (Chapter 4.3, Biological Resources)
- Potential impacts to the riparian corridor. (Chapter 4.3, Biological Resources)
- Vehicle miles traveled and greenhouse gas emissions. (Chapter 4.6, Greenhouse Gas Emissions)
- Hazardous materials on-site. (Chapter 4.7, Hazards and Hazardous Materials)
- Water conservation measures. (Chapter 4.8, Hydrology and Water Quality)
- Impervious surface and groundwater recharge. (Chapter 4.8, Hydrology and Water Quality)
- Storm drainage. (Chapter 4.8, Hydrology and Water Quality)
- Impacts to water supply. (Chapter 4.8, Hydrology and Water Quality)
- The project site location within a 100-year flood zone. (Chapter 4.8, Hydrology and Water Quality)
- Construction noise and nearby sensitive receptors. (Chapter 4.10, Noise)
- Transportation Impact Assessment. (Chapter 4.12, Transportation and Traffic)
- Traffic and vehicle trip reduction measures. (Chapter 4.12, Transportation and Traffic)

1.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

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. 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 proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance. Table 1-1 summarizes the conclusions of the environmental analysis contained in this Draft EIR and presents a summary of impacts and mitigation measures identified. It is organized to correspond with the environmental issues discussed in Chapters 4.1 through 4.14. Table 1-1 is arranged in four columns: 1) environmental impact; 2) significance without mitigation; 3) mitigation measures; and 4) significance with mitigation. For a complete description of potential impacts, please refer to the specific discussions in Chapters 4.1 through 4.14.

As shown in Table 1-1, three significant unavoidable impacts were identified for the topic of transportation and traffic (Impacts TRANS-1a, TRANS-1b, and TRANS-2). For a complete discussion of these impacts, please see Chapter 4.13, Transportation and Traffic, of this Draft EIR. The proposed project also has the potential to generate significant environmental impacts in a number of areas; however all but three (3) of these potentially significant impacts would be reduced to a less-than-significant level if the mitigation measures identified in this Draft EIR are adopted and implemented.

As described in detail in Chapter 4.0, Environmental Analysis, the proposed project would have no significant impact on agricultural, forestry, or mineral resources due to existing conditions in the project area. Accordingly, these topics have not been analyzed further in this Draft EIR.

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
AESTHETICS			
AES-1: The proposed project would not have a substantial adverse effect on a scenic vista.	LTS	N/A	N/A
AES-2: The proposed project would not substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings.	No Impact	N/A	N/A
AES-3: The proposed project would alter but not degrade the existing visual character or quality of the site and its surroundings.	LTS	N/A	N/A
AES-4: The proposed project would not expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area.	LTS	N/A	N/A
AES-5: Project development would not contribute to significant cumulative impacts to aesthetics.	LTS	N/A	N/A
AIR QUALITY			
AQ-1: The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.	LTS	N/A	N/A
AQ-2: Uncontrolled fugitive dust (PM_{10} and $PM_{2.5}$) could expose the areas that are downwind of construction sites to air pollution from construction activities without the implementation of the Air District's best management practices.	S	AQ-2: The project contractor shall comply with the following the Bay Area Air Quality Management District's best management practices for reducing construction emissions of uncontrolled fugitive dust (coarse inhalable particulate matter [PM_{10}] and fine inhalable particulate matter [$PM_{2.5}$]): ▪ Water all active construction areas at least twice daily or as often as needed to control dust emissions. Watering shall 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 shall 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).	LTS

LTS = Less than Significant, S = Significant, SU = Significant and Unavoidable

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		▪ 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. ▪ Hydro-seed or apply non-toxic soil stabilizers to inactive construction areas. ▪ Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (e.g., dirt, sand). ▪ Limit vehicle traffic speeds on unpaved roads to 15 miles per hour. ▪ Replant vegetation in disturbed areas as quickly as possible. ▪ Install sandbags or other erosion control measures to prevent silt runoff from public roadways. The City of Campbell Building Division official or his/her designee shall verify compliance that these measures have been implemented during normal construction site inspections.	
AQ-3: Construction of the proposed project would cumulatively contribute to the non-attainment designations of the SFBAAB and health risk in the Bay Area.	S	AQ-3: Implement Mitigation Measures AQ-2 and AQ-4.	LTS
AQ-4: Construction activities of the project could expose nearby residential receptors to cancer risk that would exceed the Air District's significance thresholds.	S	AQ-4: The project applicant shall specify in the construction bid that the construction contractor(s) shall use construction equipment with fitted with Level 2 Diesel Particulate Filters (DPF) or higher emissions standards for all equipment of 50 horsepower or more. Level 2 DPFs are capable of reducing 50 percent of diesel exhaust and particulate emissions from off-road equipment. ▪ Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the City of Campbell Building Division, or its designee, clearly show the requirement for Level 2 DPF or higher emissions standards for construction equipment over 50 horsepower. ▪ During construction, the construction contractor(s) shall maintain a list of all operating equipment in use on the project site for	LTS

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TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		verification by the City of Campbell Building Division or its designee. The construction equipment list shall state the makes, models, and number of construction equipment on-site. ▪ Equipment shall be properly serviced and maintained in accordance with manufacturer recommendations. ▪ The construction contractor shall ensure that all non-essential idling of construction equipment is restricted to five minutes or less, in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.	
AQ-5: The proposed project would not create or expose a substantial number of people to objectionable odors.	No Impact	N/A	N/A
BIOLOGICAL RESOURCES			
BIO-1: The proposed project would not 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 by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.	LTS	N/A	N/A
BIO-2: The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.	LTS	N/A	N/A
BIO-3: The proposed project would not have a substantial 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.	LTS	N/A	N/A
BIO-4a: Tree removal and demolition activities during site clearance could destroy active nests, and/or otherwise interfere with nesting of birds protected under State law.	S	BIO-4a: Prior to site clearance, the project applicant shall retain a qualified biologist to conduct preconstruction nesting bird surveys as follows. If tree removal 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	LTS

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EXECUTIVE SUMMARY

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		construction has been initiated in the area after which surveys can be stopped. Locations of active nests containing viable eggs or young birds of protected bird species 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. No surveys are required before vegetation disturbance between September 1 and January 31, that is, outside of the nesting season.	
BIO-4b: A substantial proportion of the exterior walls of the proposed office building would be constructed with clear glass, which could create a hazard for flying birds.	S	BIO-4b: Proposed building design shall be modified as described below to reduce the likelihood of bird strikes: ▪ No more than ten (10) percent of façade surface area shall have non-bird-safe glazing. Bird-safe glazing includes opaque glass, covering of clear glass surface with patterns, paned glass with fenestration patterns, and external screens over non-reflective glass. ▪ Occupancy sensors or other switch control devices shall be installed on non-emergency lights and shall be programmed to shut off during non-work hours and between 10 pm and sunrise. Alternatively, non-emergency lighting shall be shielded to minimize light from buildings that are visible to birds. ▪ Glass skyways or walkways, freestanding glass walls, and transparent building corners shall not be allowed.	LTS

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TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		▪ Transparent glass shall not be allowed at the rooflines of buildings, including in conjunction with green roofs. ▪ Prior to the issuance of any permits on the project, the project applicant shall work with the City to demonstrate compliance with these measures.	
BIO-5: The proposed project's planting plan is not in conformance with the SCVWD's guidance for compliance with the SCVWD's *Guidelines and Standards for Land Use Near Streams*.	S	BIO-5: The planting plan for the proposed project shall be revised to conform to Design Guide 3 of the SCVWD's *Guidelines and Standards for Land Use Near Streams*.	LTS
BIO-6: The proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan.	No Impact	N/A	N/A
BIO-7: The proposed project would not result in a significant cumulative impact with respect to biological resources.	LTS	N/A	N/A
CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES			
CULT-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.	No Impact	N/A	N/A
CULT-2: Implementation of the proposed project would have the potential to cause a substantial change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.	S	CULT-2: If archaeological resources are encountered during excavation or construction, construction personnel shall be instructed to immediately suspend all activity in the immediate vicinity of the suspected resources and the City and a licensed archeologist shall be contacted to evaluate the situation. A licensed archeologist shall be retained to inspect the discovery and make any necessary recommendations to evaluate the find under current CEQA guidelines prior to the submittal of a resource mitigation plan and monitoring program to the City for review and approval prior to the continuation of any on-site construction activity.	LTS
CULT-3: Implementation of the proposed project would have the potential to directly or indirectly affect a unique paleontological resource or site, or a unique geological feature.	S	CULT-3: In the event that fossils or fossil-bearing deposits are discovered during construction, excavations within 50 feet of the find shall be temporarily halted or diverted. The contractor shall notify a qualified paleontologist to examine the discovery. The paleontologist shall document the discovery as needed, in accordance with Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology	LTS

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TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		1995), evaluate the potential resource, and assess the significance of the finding 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 the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important. The project plan shall be submitted to the City for review and approval prior to implementation.	
CULT-4: Implementation of the proposed project would have the potential to disturb human remains, including those interred outside of formal cemeteries.	S	CULT-4: In the event a human burial or skeletal element is identified during excavation or construction, work in that location shall stop immediately until the find can be properly treated. The City and the Santa Clara County Coroner's office shall be notified. If deemed prehistoric, the Coroner's office would notify the Native American Heritage Commission who would identify a "Most Likely Descendant (MLD)." The archeological consultant and MLD, in conjunction with the project sponsor, shall formulate an appropriate treatment plan for the find, which might include, but not be limited to, respectful scientific recording and removal, being left in place, removal and reburial on site, or elsewhere. Associated grave goods are to be treated in the same manner.	LTS
CULT-5: Implementation of the proposed project would have the potential to disturb tribal cultural resources.	S	CULT-5: Implement Mitigation Measures CULT-2 and CULT-4.	LTS
CULT-6: The proposed project would not result in less-than-significant cumulative impacts with respect to cultural resources.	LTS	N/A	N/A
GEOLOGY, SOILS, AND SEISMICITY			
GEO-1: The project would not exacerbate hazards from surface rupture of a known active fault, strong seismic ground shaking, seismic-related ground failure, or landslides.	LTS	N/A	N/A
GEO-2: The proposed project would not result in substantial soil erosion or the loss of topsoil.	LTS	N/A	N/A
GEO-3: The project would not result in a significant impact related to development on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially	LTS	N/A	N/A

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TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.			
GEO-4: The project would not create substantial risks to life or property as a result of its location on expansive soil, as defined in Table 18-1-B of the Uniform Building Code.	LTS	N/A	N/A
GEO-5: Project development would involve installation of new sewer laterals and would not use alternative wastewater disposal systems.	No Impact	N/A	N/A
GEO-6: The proposed project, 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
GREENHOUSE GAS EMISSIONS			
GHG-1: The proposed project would not directly or indirectly generate greenhouse gas emissions that would result in an increase in community emissions from baseline conditions that would have a significant impact on the environment.	LTS	N/A	N/A
GHG-2: The proposed project 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: The proposed project would not result in significant cumulative impacts with respect to greenhouse gas emissions.	LTS	N/A	N/A
HAZARDS AND HAZARDOUS MATERIALS			
HAZ-1: Demolition of the existing office building on the project site may create a significant hazard by exposing construction workers to asbestos containing materials and/or lead-based paints.	S	HAZ-1: Prior to the disturbance of any suspect asbestos-containing materials and/or lead-based paint, a certified consultant shall conduct a comprehensive survey to determine if the suspect materials are present. If such materials are identified, a licensed abatement contractor shall be consulted and demolition activities shall be conducted in compliance with abatement recommendations.	LTS
HAZ-2: The project 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

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TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
HAZ-3: The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	No Impact	N/A	N/A
HAZ-4: Implementation of the proposed project 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 project would not 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, resulting in a safety hazard for people residing or working in the project area.	No Impact	N/A	N/A
HAZ-6: The project would not be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area.	LTS	N/A	N/A
HAZ-7: Implementation of the proposed project 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: The project 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.	LTS	N/A	N/A
HAZ-9: The proposed project would result in less-than-significant cumulative impacts with respect to hazards and hazardous materials.	LTS	N/A	N/A
HYDROLOGY AND WATER QUALITY			
HYDRO-1: The project would not violate any water quality standards or waste discharge requirements.	LTS	N/A	N/A
HYDRO-2: The project would not 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 (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).	LTS	N/A	N/A

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TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
HYDRO-3: The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.	LTS	N/A	N/A
HYDRO-4: The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	LTS	N/A	N/A
HYDRO-5: The proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.	LTS	N/A	N/A
HYDRO-6: The proposed project would not otherwise substantially degrade water quality.	LTS	N/A	N/A
HYDRO-7: The project 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.	No Impact	N/A	N/A
HYDRO-8: The project would not place within a 100-year flood hazard area structures which would impede or redirect flood flows.	No Impact	N/A	N/A
HYDRO-9: The project 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
HYDRO-10: The project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.	LTS	N/A	N/A
HYDRO-11: The proposed project would have a less-than-significant cumulative impact with respect to hydrology and water quality.	LTS	N/A	N/A
LAND USE AND PLANNING			
LU-1: The proposed project would not physically divide an established community.	LTS	N/A	N/A

LTS = Less than Significant, S = Significant, SU = Significant and Unavoidable

EXECUTIVE SUMMARY

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
LU-2: The proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (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.	LTS	N/A	N/A
LU-3: The proposed project would not conflict with any applicable habitat conservation plan or natural community conservation plan.	No Impact	N/A	N/A
LU-4: The proposed project would not result in significant cumulative impacts with respect to land use and planning.	LTS	N/A	N/A
NOISE			
NOISE-1: The project would not cause exposure of persons to or generation of noise levels in excess of standards established in the City of Campbell's and Town of Los Gatos' General Plan or Municipal Code, or applicable standards of other agencies. However, Mitigation Measure NO-1 is recommended to ensure that feasible measures, such as those included in the Municipal Code, are instated to minimize construction noise impacts.	S	NOISE-1: The project sponsor shall incorporate the following practices into the construction contract agreement documents to be implemented by the construction contractor during the entire construction phase of the project: ▪ The project sponsor and contractors shall prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the permit application drawing set and as part of the construction drawing set. ▪ At least 21 days prior to the start of construction activities, all off-site businesses and residents within 300' of the project site shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. ▪ At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate	LTS

LTS = Less than Significant, S = Significant, SU = Significant and Unavoidable

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		corrective action, and report the action to the City. ▪ During the entire active construction period, equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible. ▪ Require the contractor to use impact tools (e.g., jack hammers and hoe rams) that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools. ▪ During the entire active construction period, stationary noise sources shall be located as far from sensitive receptors as possible, and they shall be muffled and enclosed within temporary enclosures or insulation barriers to the extent feasible. ▪ Select haul routes that avoid the greatest amount of sensitive use areas. ▪ Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes. ▪ During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level, or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.	
NOISE-2: The proposed project would not cause exposure of people to, or generation of, excessive groundborne vibration or groundborne noise levels.	LTS	N/A	N/A
NOISE-3: The proposed project would not cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the proposed project.	LTS	N/A	N/A

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EXECUTIVE SUMMARY

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
NOISE-4: The project would cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity, which would result in a *significant* impact.	LTS	NOISE-4: Implement Mitigation Measure NOISE-1.	LTS
NOISE-5: The proposed project would not cause exposure of people residing or working in the vicinity of the study 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: The proposed project would not cause exposure of people residing or working in the project site to excessive noise levels, for a project within the vicinity of a private airstrip.	No Impact	N/A	N/A
NOISE-7: The proposed project would not result in a significant cumulative impact with respect to noise.	LTS	N/A	N/A
POPULATION AND HOUSING			
POP-1: The proposed project would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	LTS	N/A	N/A
POP-2: The proposed project would not displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere.	No Impact	N/A	N/A
POP-3: The proposed project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	LTS	N/A	N/A
POP-4: The proposed project would not result in significant cumulative impact with respect to population and housing.	LTS	N/A	N/A
PUBLIC SERVICES AND RECREATION			
PS-1: The proposed project would not result in the 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.	LTS	N/A	N/A

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TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
PS-2: The proposed project would result in less-than-significant cumulative impacts with respect to fire protection services.	LTS	N/A	N/A
PS-3: The proposed project would not result in 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.	LTS	N/A	N/A
PS-4: The proposed project would result in less-than-significant cumulative impacts with respect to police services.	LTS	N/A	N/A
PS-5: The proposed project would not result in the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.	No Impact	N/A	N/A
PS-6: The proposed project would result in less-than-significant cumulative impacts with respect to school services.	No Impact	N/A	N/A
PS-7: The proposed project would not result in the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.	LTS	N/A	N/A
PS-8: The proposed project would result in less-than-significant cumulative impacts with respect to the construction of other public facilities.	LTS	N/A	N/A
PS-9: The proposed project would not result in the need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.	LTS	N/A	N/A
PS-10: The proposed project 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 project would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	LTS	N/A	N/A

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EXECUTIVE SUMMARY

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
PS-12: The proposed project would result in less-than-significant cumulative impacts with respect to parks.	LTS	N/A	N/A
TRANSPORTATION AND TRAFFIC			
TRANS-1a: During the AM peak hour under Existing plus Project, Background plus Project, and Cumulative plus Project conditions, the intersection of San Tomas Expressway/SR 17 Southbound Ramps (Intersection #6) would continue to operate at an unacceptable LOS F with or without the addition of project-generated vehicle trips. However, the addition of project-generated trips would increase the volume-to-capacity ratios by more than 0.01 and increase the average control delay for critical movements by more than four seconds. During the PM peak hour under Cumulative plus Project conditions, this intersection would worsen from LOS E to LOS F with the addition of project-generated vehicle trips. During the AM and PM peak hours under Cumulative plus Project conditions, the queue on the SR 17 southbound off-ramp right-turn lane would extend to 26 vehicles, which is two vehicles more than the estimated storage capacity.	S	TRANS-1a: The recommended mitigation measure would be to widen the westbound (off-ramp) approach at the intersection of the San Tomas Expressway/SR 17 southbound ramps (Intersection #6) to include a second right turn lane, resulting in two left-turn lanes, one through shared left-turn lane, and two right-turn lanes (with the right-turn-on-red (RTOR) movement prohibited). Also, the right-turn lane should be extended by 50 linear feet (plus a 120-foot transition taper) for the off-ramp to accommodate the anticipated vehicle queuing. Extension of the existing right-turn lane would include modification of the roadway pavement, pavement striping, metal beam guardrails and roadside embankment to accommodate the added length. However, 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. The SR 17 off-ramp is a Caltrans facility and any improvements to the off-ramp would be within the Caltrans right-of-way. Additionally, as San Tomas Expressway is a County-operated route and part of the CMP network, any modifications to the intersection would require coordination and approval from Caltrans, the County of Santa Clara, and the VTA. This mitigation measure is not part of VTA's current VTA Measure B regional improvements list. As such, given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the project's impact is considered to be significant and unavoidable.	SU
TRANS-1b: During the PM peak hour under Existing plus Project conditions, the addition of project-generated traffic would cause the freeway segment of southbound SR 85 from Saratoga Avenue to Winchester Boulevard to deteriorate from LOS E to F.	S	TRANS-1b: 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 not under the jurisdiction of the City of Campbell, and as such implementation cannot be assured. In addition, freeway improvement projects, which add travel lanes are planned and	SU

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TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
		funded on a regional scale and would be too costly for a single project to be expected to fund. A proportional (or fair share) contribution cannot be calculated for the project because the cost for this improvement has not been developed.	
TRANS-2: During the AM peak hour under Existing plus Project and Background plus Project conditions, the intersection of San Tomas Expressway/SR 17 Southbound Ramps (Intersection #6) would operate at an unacceptable LOS F with or without the addition of project-generated vehicle trips. The addition of project-generated trips would increase the volume-to-capacity ratios by more than 0.01 and increase the average control delay for critical movements by more than four seconds.	S	TRANS-2: The recommended mitigation measure would be to widen the westbound (off-ramp) approach at the intersection of the San Tomas Expressway/SR 17 southbound ramps (Intersection #6) to include a second right turn lane. Although recommended widening of the southbound off-ramp would improve traffic levels sufficient to reduce this impact to a less-than-significant level, implementation of the widening cannot be guaranteed as the off-ramp is a Caltrans facility and the intersection is County-operated. Furthermore, the recommended improvement is not part of VTA's Measure B regional improvements list.	SU
TRANS-3: The proposed project 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.	No Impact	N/A	N/A
TRANS-4: The proposed project 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
TRANS-5: The proposed project would not result in inadequate emergency access.	LTS	N/A	N/A
TRANS-6: The proposed project 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
UTILITIES AND SERVICE SYSTEMS			
UTIL-1: The proposed project would have sufficient water supplies available from existing entitlements, conservation plans and resources, and would not require new or expanded entitlements.	LTS	N/A	N/A
UTIL-2: The proposed project 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: The proposed project, in combination with past, present,	LTS	N/A	N/A

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EXECUTIVE SUMMARY

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to water service.			
UTIL-4: The proposed project would not exceed wastewater treatment requirements of the San Francisco Bay Regional Water Quality Control Board.	LTS	N/A	N/A
UTIL-5: The proposed project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.	LTS	N/A	N/A
UTIL-6: The proposed project would not result in the determination by the wastewater treatment provider, which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	LTS	N/A	N/A
UTIL-7: The proposed project, in combination with past, present, and reasonably foreseeable projects would result in less than significant cumulative impacts with respect to wastewater service.	LTS	N/A	N/A
UTIL-8: The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs.	LTS	N/A	N/A
UTIL-9: The proposed project would comply with federal, State, and local statutes and regulations related to solid waste.	LTS	N/A	N/A
UTIL-10: The proposed project, in combination with past, present, and reasonably foreseeable development, would not result in significant impacts with respect to solid waste.	LTS	N/A	N/A
UTIL-11: The proposed project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.	LTS	N/A	N/A
UTIL-12: The proposed project, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to stormwater infrastructure.	LTS	N/A	N/A
UTIL-13: The proposed project would not result in a substantial	LTS	N/A	N/A

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TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Environmental Impact	Significance Without Mitigation	Mitigation Measures	Significance With Mitigation
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.			
UTIL-14: The proposed project, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to energy conservation.	LTS	N/A	N/A

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2. *Introduction*

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, Chapter 14 California Code of Regulations, Section 15378[a], the 1700 Dell Avenue Office Development Project 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 (EIR) provides an assessment of the potential environmental consequences of adoption and implementation of the project, herein referred to as "proposed project." Additionally, this Draft EIR identifies mitigation measures and alternatives to the proposed project that would avoid or reduce significant impacts. This Draft EIR compares the development of the proposed project with the existing baseline condition, described in detail in Chapter 4.0, Environmental Analysis, and each subchapter (Chapters 4.1 through 4.14). The City of Campbell (City) is the lead agency for the proposed project. This assessment is intended to inform the City's decision-makers, other responsible agencies, and the public-at-large of the nature of the proposed project and its effect on the environment.

2.1 PROPOSED PROJECT

The proposed project would redevelop the project site with a 161,870-square-foot four-story office building, a 146,478-square-foot five-story parking garage (plus underground parking), additional surface parking, and a 9,511-square-foot on-site public open space area at 1700 Dell Avenue. The proposed project would also require a zone change to rezone the property from Controlled Manufacturing (C-M) to Planned Development (P-D). The project proposes a dedication of a portion of the project site's frontage for street improvements along Dell Avenue. The proposed project is described in more detail in Chapter 3, Project Description, of this Draft EIR.

2.2 EIR SCOPE

This Draft EIR is a project-level EIR that identifies and analyzes site specific potential impacts of the project. This is in contrast to programmatic EIRs, which are used to assess the impact of land use plans where specific uses and plans for construction have not yet been determined. As a project-level EIR or project EIR, the environmental analysis primarily focuses on the changes in the environment that would result from the development of the proposed project. This project EIR examines the specific short-term impacts (construction) and long-term impacts (operation) that would occur as a result of project approval and implementation. For a complete listing of environmental topics covered in this Draft EIR, see Chapter 4.0, Environmental Analysis.

2.3 ENVIRONMENTAL REVIEW PROCESS

2.3.1 DRAFT EIR

Pursuant to CEQA Section 21080(d)[1] and CEQA Guidelines Section 15063,[2] the City determined that the proposed project could result in potentially significant environmental impacts and that an EIR would be required. In compliance with CEQA Section 21080.4, the City circulated the Notice of Preparation (NOP) of an EIR for the proposed project to the Office of Planning and Research State Clearinghouse and interested agencies and persons on July 1, 2018 for a 30-day review period. A public scoping meeting was held on July 10, 2018 at 7:30 p.m. in the City Hall Council Chambers located at 70 North 1st Street in the City of Campbell. The NOP and scoping process solicited comments from responsible and trustee agencies, as well as interested parties regarding the scope of the Draft EIR. "Responsible agencies" are public agencies that carry out or approve a project for which a lead agency is conducting CEQA review; responsible agencies are all agencies other than the lead agency with discretionary approval power over the project. In the case of the proposed project, the project would require a permit from the SCVWD for any improvements within or connections to the Los Gatos Creek Trail. "Trustee agencies" are certain State agencies with jurisdiction over natural resources affected by the project. Appendix A of this Draft EIR contains the NOP, as well as the comments received by the City in response to the NOP.

The scope of this EIR was established by the City of Campbell through the EIR scoping process and includes an analysis of both the proposed project's impacts and cumulative impacts in the following issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural and Tribal 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
- CEQA-Mandated Assessment Conclusions:
  - Impacts Found Not To Be Significant
  - Significant Unavoidable Impacts
  - Growth-Inducing Impacts
  - Significant Irreversible Changes

This Draft EIR will be available for review by the public and interested parties, agencies, and organizations for a 47-day comment period starting on Thursday, April 25, 2019 and ending on Tuesday, June 11, 2019. During the comment period, the public is invited to submit written comments vial mail or e-mail on the Draft EIR to the City of Campbell Community Development Department. Written comments should be submitted to:

[1] The CEQA Statute is found at California Public Resources Code, Division 13, Sections 21000 to 21177.
[2] The CEQA Guidelines are found at California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 to 15387.

Cindy McCormick, Senior Planner
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Community Development Department
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Campbell, CA 95008
Phone: (408) 871-5103
Email: cindym@cityofcampbell.com

Written and/or verbal comments on the Draft EIR will also be accepted at a Planning Commission hearing, during the public comment period, which will be legally noticed and is tentatively scheduled for Tuesday, June 11, 2019 at 7:30 p.m. in the City Council Chambers.

2.3.2 FINAL EIR

Upon completion of the 45-day review period for the Draft EIR, the City of Campbell will review all comments received and prepare written responses for each comment on the adequacy of the Draft EIR. A Final EIR will then be prepared, which contains all of the comments received, responses to comments raising environmental issues, and any changes to the Draft EIR. The Final EIR will then be presented to the City of Campbell for certification as the environmental document for the proposed project. 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. All responses to comments submitted on the Draft EIR by agencies will be provided to those agencies at least 10 days prior to public hearings on the project.

The Planning Commission will review the Final EIR and the proposed project and make a recommendation to the City Council, which is the decision-making body for the EIR and the proposed project. A City Council public hearing will then be scheduled to concurrently consider a decision on the project and certification of the Final EIR. If the City Council determines that the project may be approved, the City Council will certify the Final EIR and adopt and incorporate into the project all feasible mitigation measures identified in the EIR and may also require other feasible mitigation measures as conditions of approval. However, the City Council may also find that the project does not satisfy the required findings for approval and decide to reject the project on that basis. In that case, the City Council is not required to certify the Draft EIR. Public input is encouraged at all public hearings before the City.

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 it has made mitigation findings 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 and Reporting Program for the proposed project will be completed and available to the public prior to certification of this EIR.

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3. *Project Description*

Dollinger Properties, the project applicant, is proposing the 1700 Dell Avenue Office Development project (proposed project or project), to redevelop a 4.5-acre project site with a 161,870-square-foot four-story office building, a 146,478-square-foot five-story parking garage (plus underground parking), additional surface parking, and an on-site public open space area at 1700 Dell Avenue in Campbell, California. The project site is identified by the Santa Clara County Assessor's Office as Assessor's Parcel Number (APN) 424-33-094.

This chapter provides a detailed description of the project, including the site location, setting, and characteristics; objectives of the project; principal features of the project; approximate construction phasing; and required permits and approvals. These activities and approvals collectively constitute the "project" for the purposes of this EIR.

3.1 PROJECT SITE LOCATION AND CHARACTERISTICS

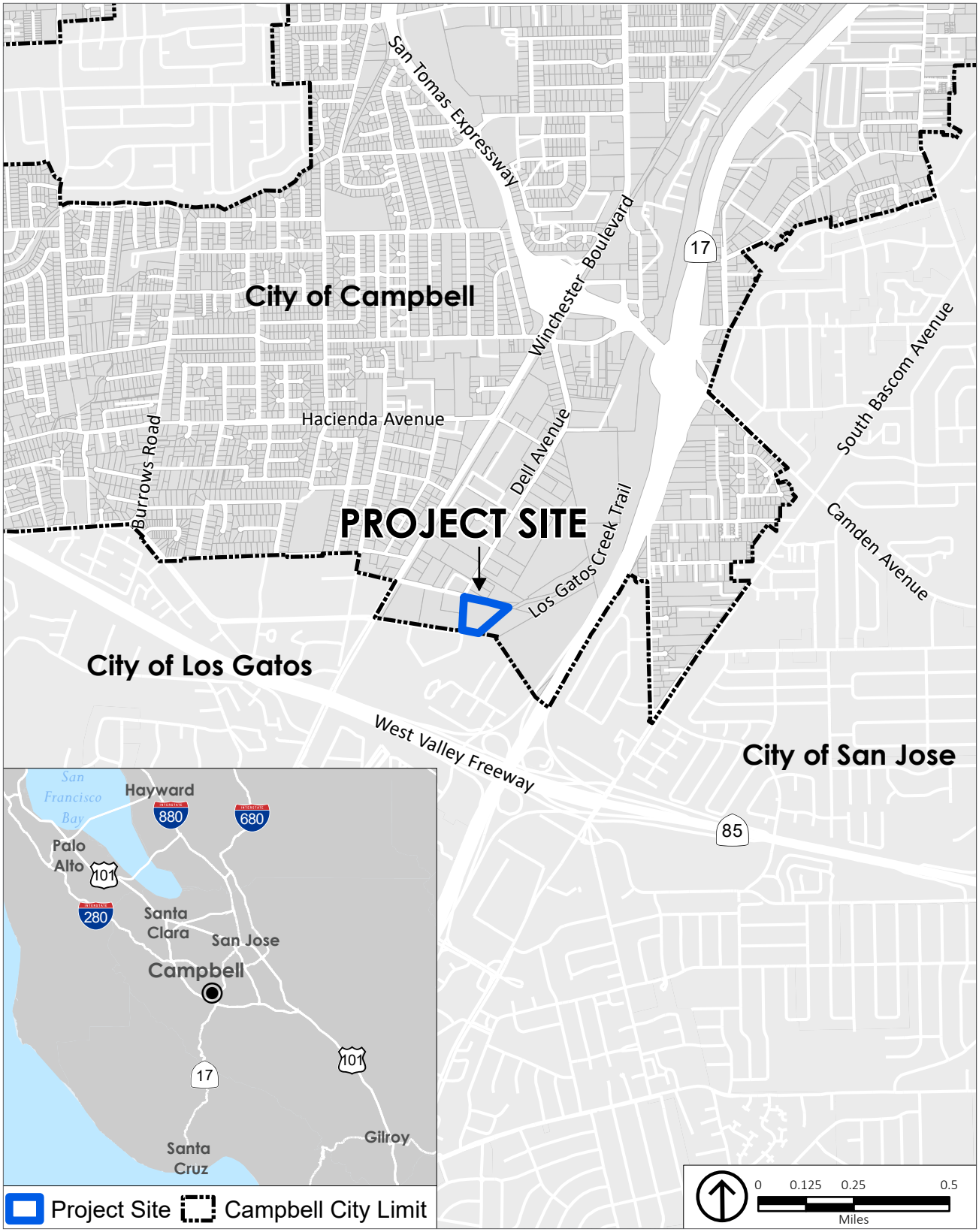
3.1.1 PROJECT SITE LOCATION AND SETTING

As shown on Figure 3-1, the project is located west of the Los Gatos Creek Trail within southern Campbell adjacent to the City's border with Los Gatos. The City of Campbell (City) is located approximately 50 miles south of San Francisco in Santa Clara County and is bounded on the north, west, and east by the cities of San José and Saratoga, and on the south by the Town of Los Gatos. Regional access to the city is provided via the San Tomas Expressway and State Route 17 (Highway 17), Interstate 280 (I-280), and State Route 85 (SR-85).

As shown on Figure 3-2, the project site is located adjacent to the corner of Knowles Drive and Dell Avenue within a developed area of the city. Local access to the project site is provided via SR-85, Winchester Boulevard, Knowles Drive, and Dell Avenue. The project site is bounded by the Los Gatos Creek to the east and a mix of commercial, office, and light industrial uses to the north, west, and south.

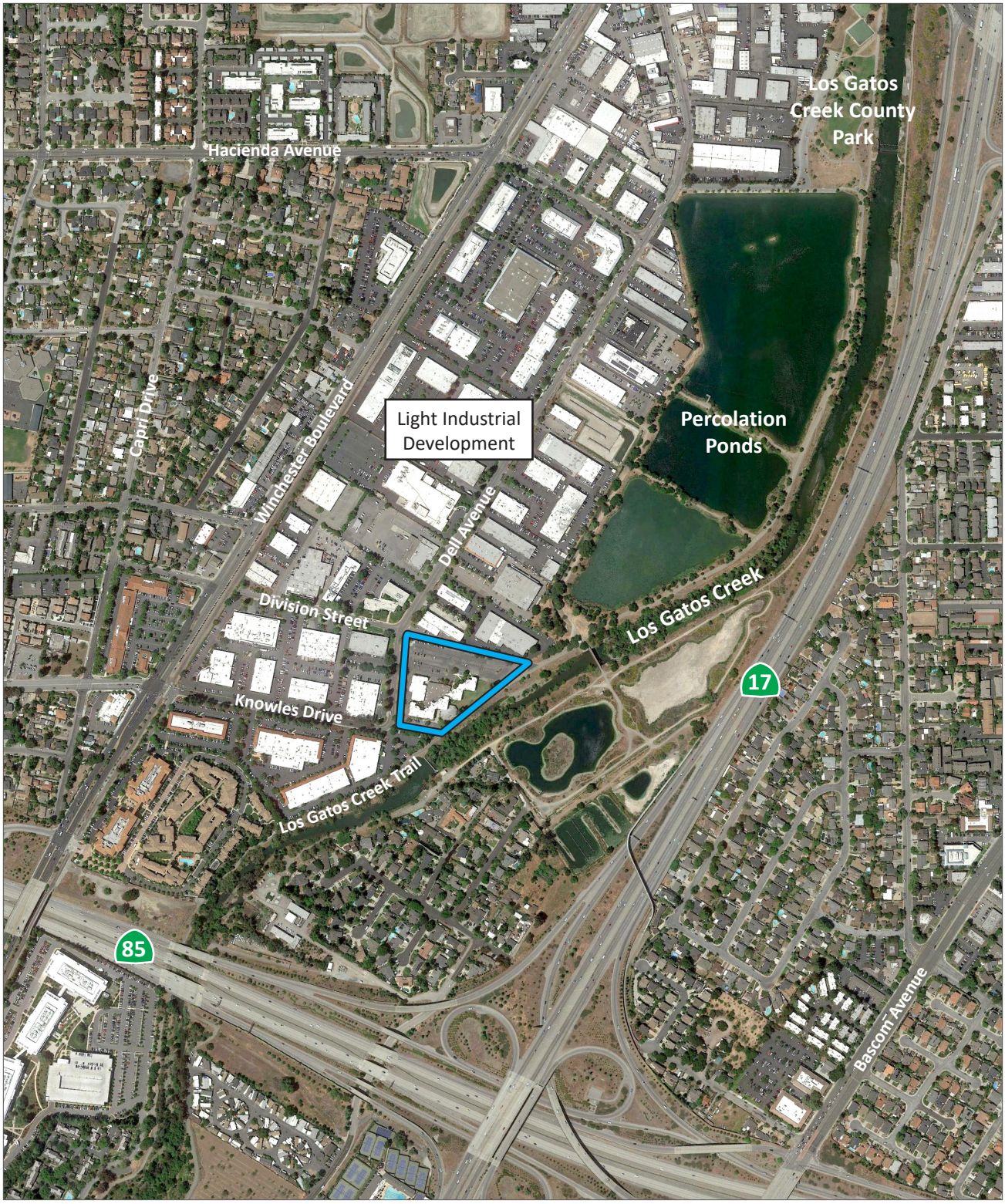
3.1.2 EXISTING SITE CONDITIONS

The 4.5-acre project site is currently developed with a 71,620-square-foot office building and a surface parking lot. As of May 2018, roughly one third of the office space in the existing office building is occupied. The existing building is irregularly shaped and has areas that are single story, two stories, and three stories. Access to the property is gained via two driveway entrances on the western and southern portions of the site along Dell Avenue. The project site was developed with the existing building in 1975 and has operated as an office building since its initial construction. The building is located (approximately) within the middle of the project site with surface parking to the north, west, and south of the building.



Source: ESRI, January 29, 2018; PlaceWorks, 2019.

Figure 3-1
Regional Location



Source: Google Earth Professional, 2018. PlaceWorks, 2019.

0 700
Scale (Feet)

Project Site Boundary

Figure 3-2
Local Context

The project site is generally flat, with trees and shrubs located along the perimeter of the building and the edges of the project site. Existing landscaping includes 26 trees and a variety of shrubs comprised of ornamental species.[1]

3.1.3 GENERAL PLAN LAND USE AND ZONING DESIGNATION

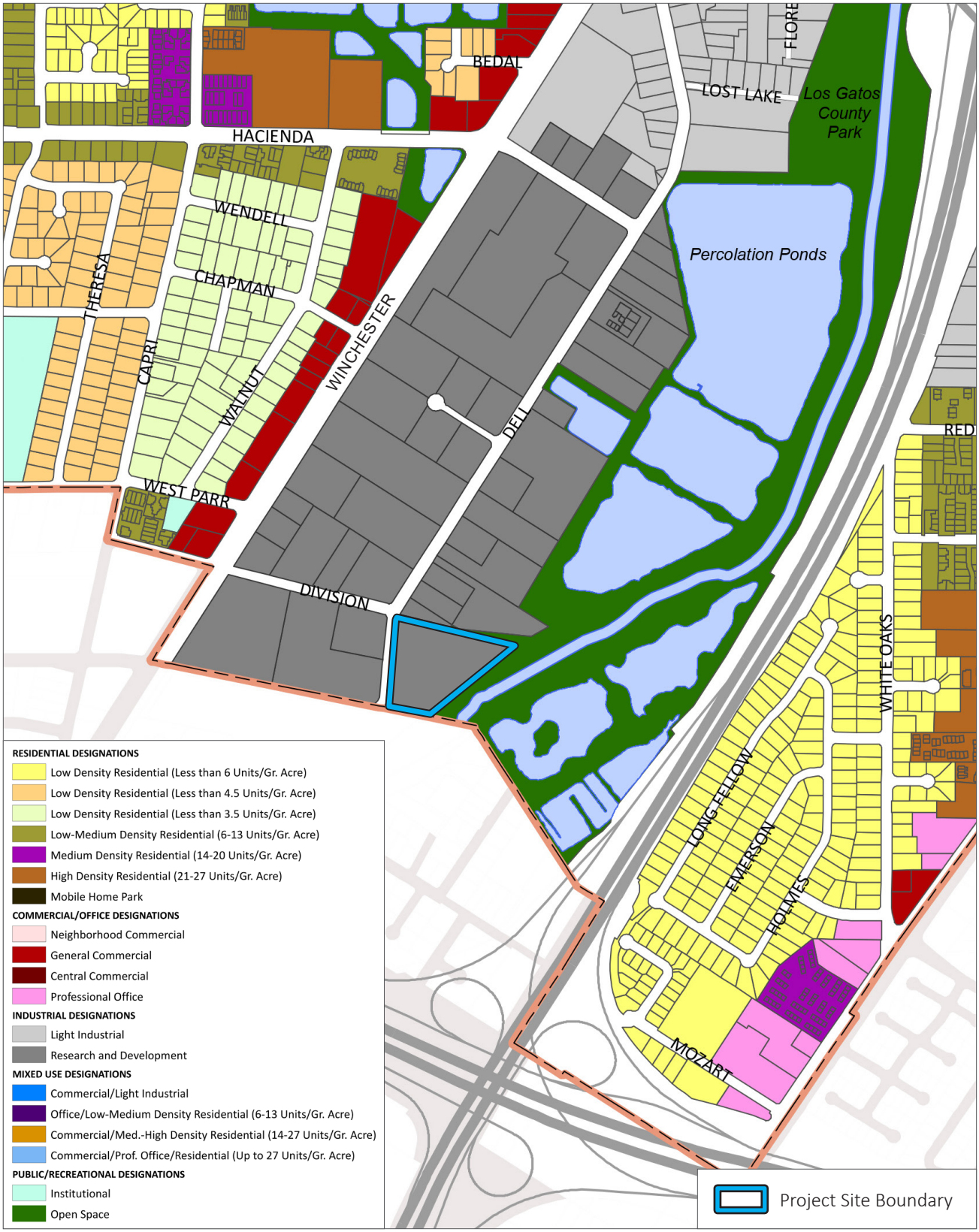
Figure 3-3 and Figure 3-4 show the General Plan and Zoning designations, respectively, for the project site and surrounding vicinity. The City of Campbell General Plan designates the project site as Research and Development. This designation is intended for campus-like environments for corporate headquarters, research and development facilities, and office development. Permitted uses include incubator-research facilities, testing, packaging, publishing, and printing. The Research and Development designation is one of two light industrial land uses within the City of Campbell. Industrial development within the City is located primarily along Dell Avenue, the McGlincey Lane area, and Old Camden Avenue.

The project site is zoned Controlled Manufacturing (C-M). The purpose of 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. The C-M zoning district is consistent with the Research and Development land use designation of the General Plan. Permitted uses in the C-M zoning district include artisan products, business support service, collection containers, electronics and equipment manufacturing, machinery manufacturing, plastics and rubber products, research and development, warehousing, and distribution facilities. The development standards within the C-M zoning district include a maximum building height of 45 feet, a maximum floor area (FAR) ratio of 40 percent, and minimum setbacks of 20 feet in the front and 10 feet on the sides and rear of the property. The applicant proposes to change the zoning designation from C-M to Planned Development (P-D) to allow more flexible development standards, as discussed further in this EIR. Project Objectives

The project applicant has developed the following objectives:

- Create a high-quality, regionally significant office development/technology campus that can compete with other cities and counties in Silicon Valley to attract high tech, med tech/modern medical, or other innovative businesses.
- Enhance the project site with quality work spaces, adequate parking, and outdoor space.
- Attract a workforce population that supports local businesses.
- Revitalize the project site in a socially vibrant and economically viable manner that reflects the project site's position as a gateway to the city.
- Create an employment center that maximizes the project site's development potential.

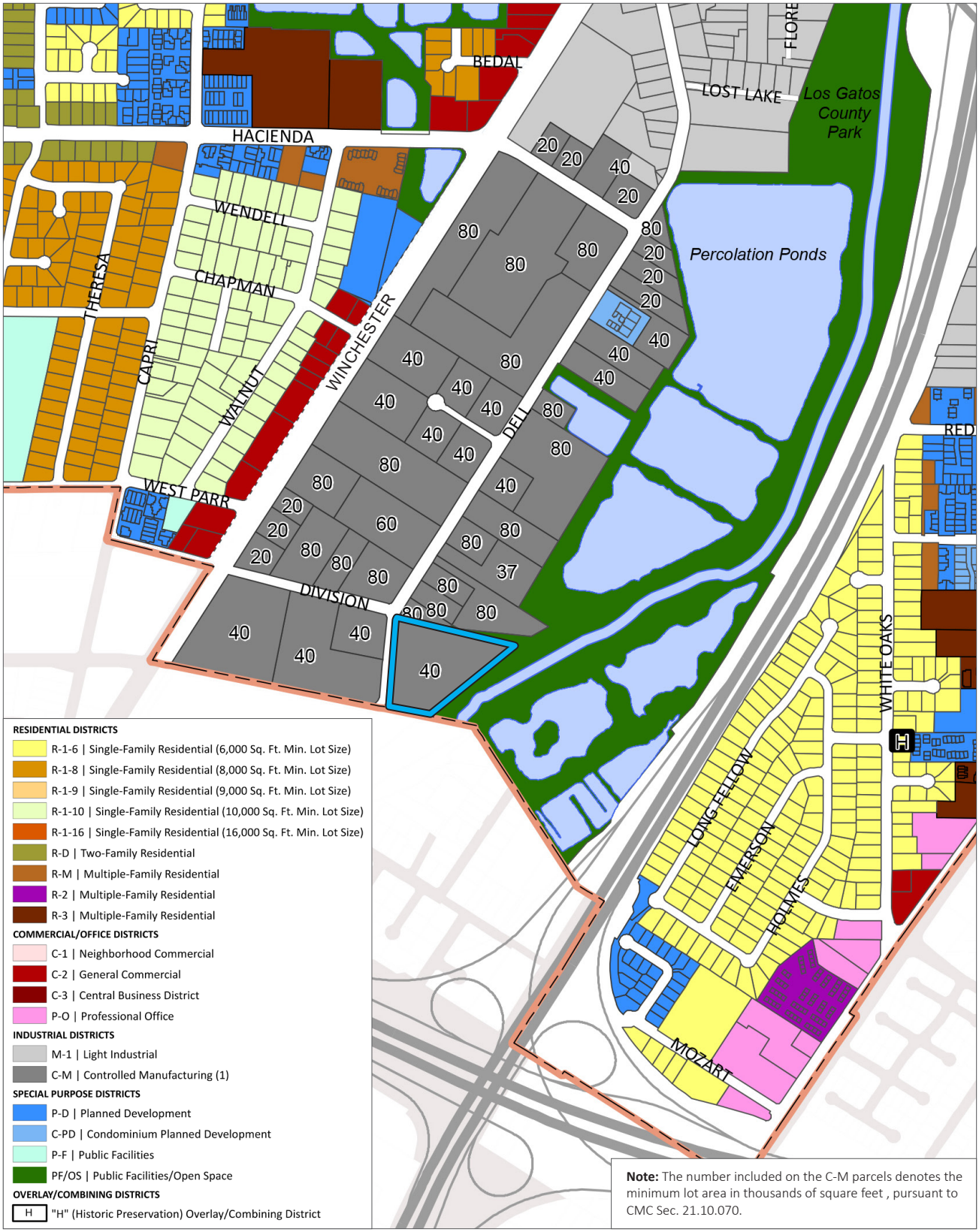
[1] Walter Levison Consulting Arborist, March 19, 2019, Assessment of and Recommendations for 26 Protected-Size Trees.



Source: The City of Campbell General Plan Map, 2017. PlaceWorks, 2019.

0 700
Scale (Feet)

Figure 3-3
General Plan Land Use Designations in the Project Vicinity



Source: The City of Campbell General Plan Map, 2017. PlaceWorks, 2019.

0 700
Scale (Feet)

Project Site Boundary

Figure 3-4
Zoning in the Project Vicinity

- Promote the project site's proximity to the Los Gatos Creek pedestrian and bicycle trail and the proposed Santa Clara Valley Transportation Authority's Light Rail station at Hacienda and Winchester Boulevard, as a means to minimize the reliance of the anticipated workforce automobile travel, which in turn has the effect of limiting traffic congestion, vehicle miles traveled, and associated emissions.

3.2 PROPOSED PROJECT

As previously stated, the proposed project would redevelop the project site with a 161,870-square-foot four-story office building, a 146,478-square-foot five-story parking garage (with one level of underground parking), additional surface parking, and on-site open space at 1700 Dell Avenue. The proposed project includes a request for a zone change to rezone the property from C-M to Planned Development (P-D). The following sections provide a detailed description of the key project components.

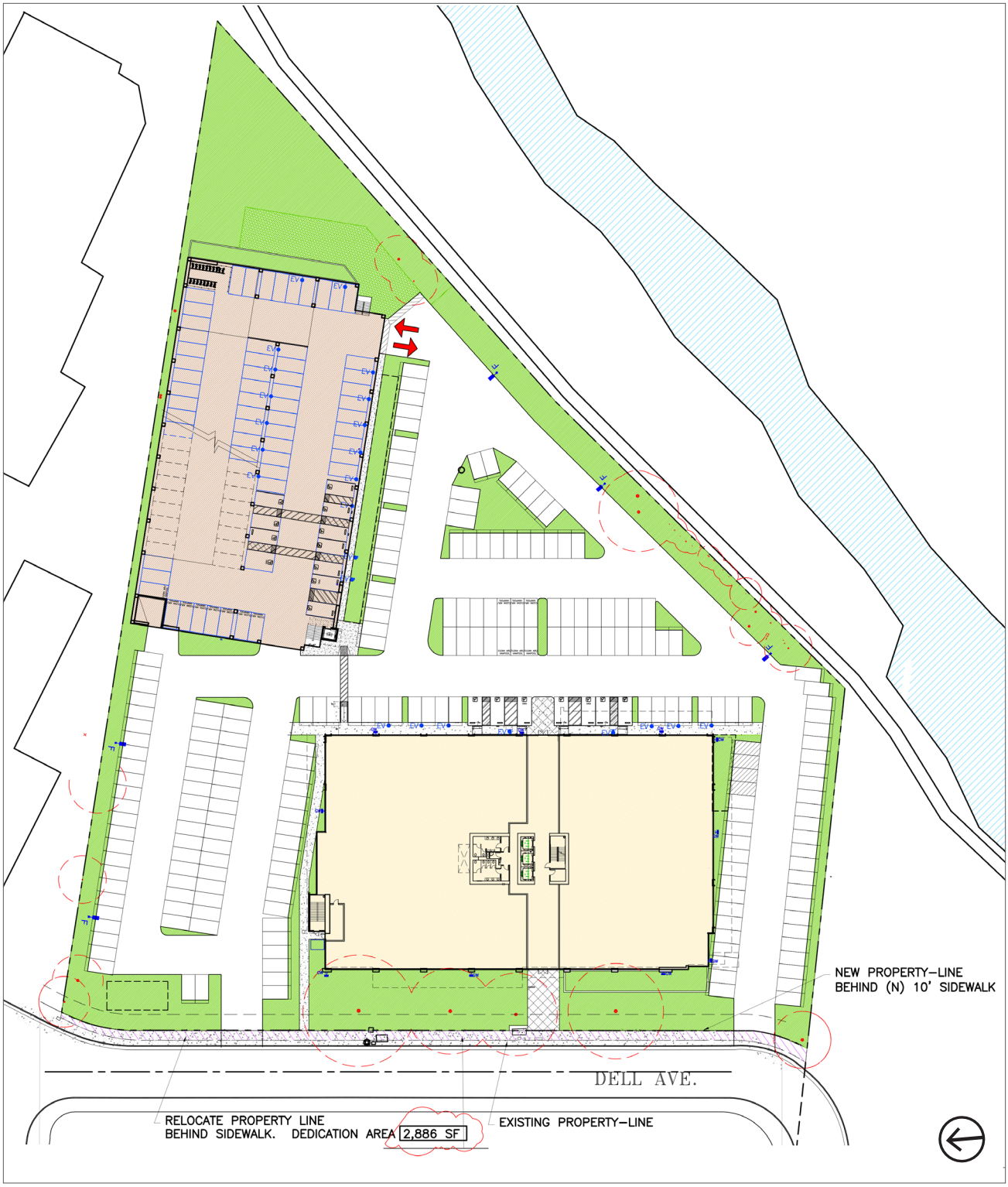
3.2.1 SITE PREPARATION AND CONSTRUCTION

Demolition of the existing office building and surface parking lot, and construction of the proposed project, are estimated to begin in the beginning of 2020 and occur for approximately 18 months, ending in June 2021. Grading and excavation on the project site would involve the excavation and export of 5,000 cubic yards of soil and the import of 1,750 cubic yards of fill. Site preparation and construction activities would be done in compliance with the City of Campbell Municipal Code and erosion control measures would be implemented as required under the City's Stormwater Pollution Prevention regulations pursuant to Chapter 14.02, Stormwater Pollution Control.

3.2.2 PROPOSED DEVELOPMENT

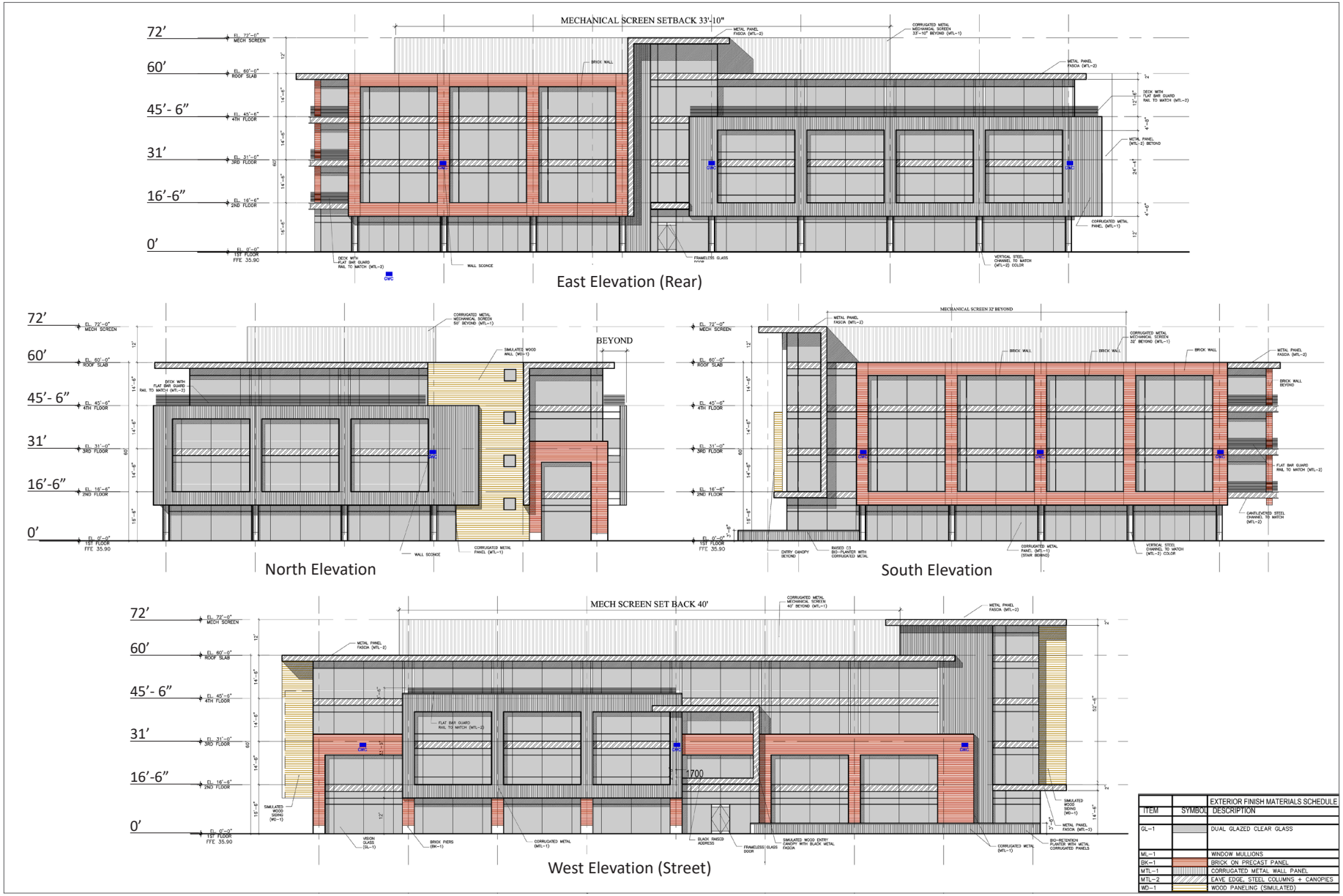
As shown on Figure 3-5, the proposed office building would be located on the western boundary of the project site along Dell Avenue and the proposed parking garage would be located along the northern boundary of the project site. As shown on Figure 3-6 , the proposed office building would have a maximum height of 72 feet (60 feet plus 12 feet for mechanical screen), exceeding the CM district height standard by 15 feet.[2] As shown on Figure 3-7, the proposed parking garage would have a maximum height of 43.5 feet. The proposed four-story office building would feature contemporary architectural details including large glass windows, simulated wood slats, and charcoal grey, silver, and white metal panels. The proposed five-story parking garage would feature a similar aesthetic. Please refer to Figures 3-8 and 3-9 for detailed renderings of the proposed buildings. The parking garage would provide six levels of parking, including a partial subterranean level, four full levels (Levels 1 through 4), and a partial top level (Level 5).

[2] Parapet walls and roof structures for the housing of equipment required to operate and maintain the building are excluded from the maximum height requirement.



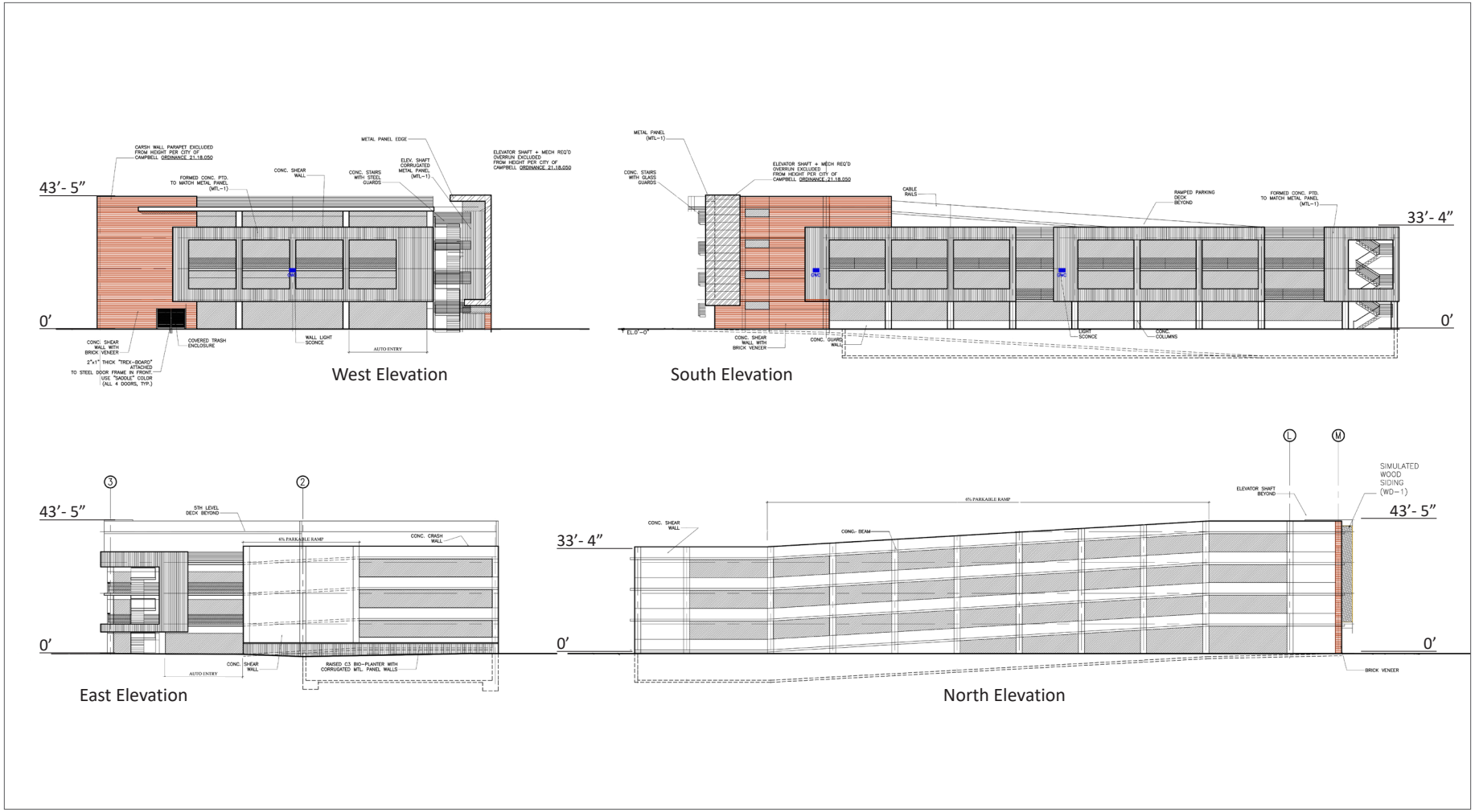
Source: CHANG Architecture, February 19, 2019. PlaceWorks, 2019.

Figure 3-5
Site Plan



Source: CHANG Architecture, February 19, 2019. PlaceWorks, 2019.

Figure 3-6
Proposed Office Building Elevation



Source: CHANG Architecture, February 19, 2019. PlaceWorks, 2019.

Figure 3-7
Proposed Parking Garage Elevation

Source: CHANG Architecture, October 18, 2018. PlaceWorks, 2019.

Figure 3-8
Proposed Office Building Façade

Northeast View

Southeast View

Source: CHANG Architecture, October 18, 2018. PlaceWorks, 2019.

Figure 3-9
Proposed Office Building Façade

The proposed project would also develop a 9,511-square-foot public open space area on the northeastern corner of the project site directly adjacent to the Los Gatos Creek trail. As shown on Figure 3-10, the proposed public open space area would feature a public gathering space with shade trees, tables, concrete pavers, benches, and seatwalls. The proposed project would also dedicate a portion of the project site's frontage for street improvements along Dell Avenue.

3.2.3 ZONING AMENDMENT

As described above, the proposed office building would have a maximum height of 72 feet (60 feet plus 12 feet for a mechanical screen) which exceeds the maximum building height of 45 feet for development within the C-M zoning district.[3] The proposed FAR of 83 percent also exceeds the allowable 40 percent FAR. In order to request flexibility with regard to the C-M zoning development standards, the applicant is requesting an amendment to the zoning district to rezone the project from C-M to P-D. 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 a use or development, or a combination of uses or types of developments that are determined to be in conformance with the underlying land use designation of the General Plan. In order to approve the requested P-D zone change, P-D permit, and related flexibility with regard to development standards, the City Council, upon recommendation of the Planning Commission, must be able to make all required findings of approval, identified in the Campbell Municipal Code Section 21.12.030.

3.2.4 SITE ACCESS, PARKING, AND CIRCULATION

Vehicular access to the project site is provided via Dell Avenue, as shown on Figure 3-5. Pedestrian access to the project site would be provided via the existing sidewalks along Dell Avenue and the Los Gatos Creek trail. The proposed parking garage includes 513 vehicle parking stalls and the proposed surface parking lot includes 223 vehicle parking stalls for a combined total of 736 stalls. Proposed vehicle parking would accommodate standard, disabled-accessible, and clean air/vanpool/electric vehicle spaces. The project also includes 37 long-term and short-term bike parking spaces. The two driveways located along Dell Avenue would continue to serve as the primary access points to the project site.

3.2.5 LANDSCAPING

As shown in Figure 3-10, proposed landscaping would include an open space area on the northeast corner of the site, in addition to landscaping surrounding the project site boundary, parking areas, and the proposed building. The project site includes 26 existing trees and a variety of shrubs comprised of ornamental species.[4] As shown on Figure 3-11, eight (8) on-site trees are proposed for removal.[5] Tree

[3] Pursuant to Campbell Municipal Code Section 21.18.050 (Exceptions to height provisions), roof structures for the housing of mechanical equipment required to operate and maintain the building, may be erected above the height limit, so long as it does not provided additional floor space.

[4] Walter Levison Consulting Arborist, March 19, 2019, Assessment of and Recommendations for 26 Protected-Size Trees.

[5] Chang Architecture, Landscape Tree Removal Plan, Sheet L1.3.

removal would be conducted pursuant to standards identified in City of Campbell Municipal Code Section 21.32.070, Tree Removal Permit/Application Requirements. The proposed project would plant 111 trees throughout the project site and along the perimeter. Proposed trees include Coast live oak (*Quercus agrifolia*), Island Ironwood (*Lyonothamnus Floribundus*), Roberts California Sycamore (*Plantanus R. Roberts*), Saratoga Bay Laurel (*Laurus Saratoga*), Hybrid Crape Myrtle (*Lagerstoemia H. Arapaho*), Medora Juniper (*Juniperus S. Medora*), and Yew Pine (*Podocarpus Macrophyllus*). The project plans include the protection measures recommended in the arborist report prepared for the project to protect on-site trees during site development activities. The proposed landscaping would also include plantings of grasses, shrubs, and other ground cover. In total, the project would include 46,968 square feet of landscaping.

3.2.6 LIGHTING

Proposed on-site lighting would include pole mounted lights and overhead soffit lighting around the proposed building, parking garage, surface parking lot, and public open space. The proposed project would also install light poles ranging in height from 15 feet to 18 feet along the perimeter of the surface parking lot. The proposed light poles would include 180 degree cut-off shields to prevent light spillover across property lines. All proposed lighting would include a timer or photo cell to provide flexibility. The fixtures will be of simple modern style to complement the building architecture and black in color to minimize visibility against the trees and buildings.

3.2.7 UTILITIES AND SERVICE CONNECTIONS

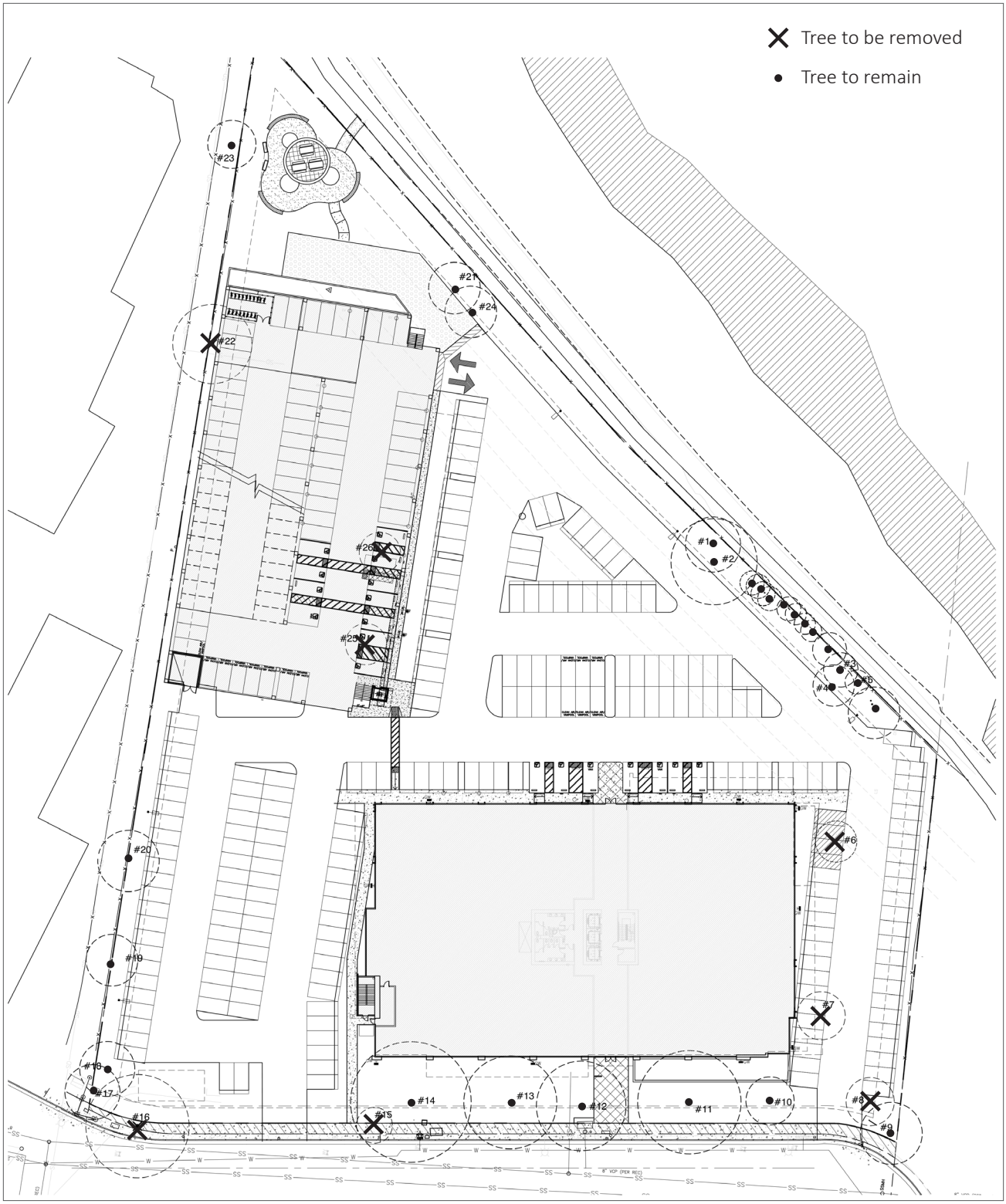
The project would be serviced by the following utility connections:

- Potable Water Supply. The San José Water Company would supply potable water service to the project.
- Stormwater. The City of Campbell would provide stormwater collection services to the project site.
- Sanitary Sewer Service. Wastewater generated on the project site would be treated by the San José-Santa Clara Regional Wastewater Facility located north of the City of San José.
- Dry Utilities. Gas and electricity would be supplied to the project site by Pacific Gas & Electric. Telephone, cable, and fiber optic lines would be provided by a number of providers (e.g., AT&T, Comcast, etc.).

Source: CHANG Architecture, 2019. PlaceWorks, 2019.

0 120
Scale (Feet)

Figure 3-10
Proposed Landscaping and Open Space Plan



Source: CHANG Architecture, February 18, 2019. PlaceWorks, 2019.

Figure 3-11
Proposed Tree Removal Plan

3.3 REQUIRED PERMITS AND APPROVALS

The City of Campbell is the Lead Agency for the preparation and certification of the EIR. Where appropriate, responsible, trustee, and other agencies will be consulted during the EIR process. Subsequent development entitlements for the project may require approval of State, federal, and regional responsible and trustee agencies that may rely on the EIR for decisions in their areas of expertise.

Approval of the project would require the following permits and approvals from the City of Campbell:

- Zoning Amendment
- Planned Development Permit
- Site and architectural review
- Tree removal permit

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4. Environmental Analysis

CHAPTER ORGANIZATION

This chapter of the Draft EIR is made up of 14 subchapters, which evaluate the direct, indirect, and cumulative environmental impacts from approval and implementation of the proposed project. The following sections describe the format of the environmental analysis, the format of the thresholds of significance and the methodology of the cumulative impact analysis.

FORMAT OF ENVIRONMENTAL ANALYSIS

The California Environmental Quality Act (CEQA) Guidelines Section 15128 allows for no analysis of environmental issues for which there is no likelihood of significant impact. Due to the location of the proposed project in an urbanized area in the City of Campbell, no impacts would occur to agricultural, forestry or mineral resources. A brief discussion of each topic is provided as follows:

- Agricultural Resources: Maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency categorizes lands within Campbell as Urban and Built-Up Land.[1] There are no agricultural lands classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance within the City of Campbell. The California Land Conservation Act (Williamson Act) 2014 State Report identifies land in Santa Clara County that is under Williamson Act contract; however, none are located within the City of Campbell.[2] Therefore, approval and implementation of the proposed project would not conflict with lands under Williamson Act contract. For these reasons, there would be no impacts to agricultural resources under CEQA.
- Forestry Resources: According to 2006 mapping data from the California Department of Forestry and Fire Protection, the city of Campbell does not contain any woodland or forestland cover;[3] therefore, the city does not contain land zoned for Timberland Production nor does the Campbell Zoning Map identify areas zoned for Timberland Production.[4] Consequently, there would be no impacts to forestry resources under CEQA.
- Mineral Resources: The California Department of Conservation, Geological Survey classifies lands into Aggregate and Mineral Resource Zones (MRZs) based on guidelines adopted by the California State

[1] California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed August 3, 2018.

[2] California Department of Conservation, 2015, California Land Conservation (Williamson) Act 2014 Status Report, page 34.

[3] California Department of Forestry and Fire Protection Fire and Resource Assessment Program, Land Cover Map, http://frap.fire.ca.gov/data/frapgismaps/pdfs/fvegwhr13b_map.pdf, accessed July 23, 2018.

[4] City of Campbell, Zoning Map, https://www.ci.campbell.ca.us/DocumentCenter/View/1430/Zoning-Map?bidId=, accessed July 23, 2018.

Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1974. These MRZs identify whether known or inferred significant mineral resources are present in areas. Lead agencies are required to incorporate identified MRZs resource areas delineated by the State into their General Plans.[5] The City of Campbell has no General Plan Land Use designation for mineral resources.[6] Therefore, no impacts to mineral sources under CEQA would occur.

Accordingly, this chapter of the Draft EIR is made up of 14 subchapters, which evaluate the direct, indirect, and cumulative environmental impacts of the proposed project. In accordance with Appendix F, Energy Conservation, and Appendix G, Environmental Checklist, of the CEQA Guidelines as amended per Assembly Bill 52 (Tribal Cultural Resources) and the California Supreme Court in a December 2015 opinion [*California Building Industry Association (CBIA) v. Bay Area Air Quality Management District (BAAQMD)*, 62 Cal. 4th 369 (No. S 213478)], the potential environmental effects of the proposed project are analyzed for potential significant impacts in the following 14 environmental issue areas, which are organized with the listed abbreviations:

- Aesthetics (AES)
- Air Quality (AQ)
- Biological Resources (BIO)
- Cultural and Tribal Cultural Resources (CULT)
- Geology, Soils, and Seismicity (GEO)
- Greenhouse Gas Emissions (GHG)
- Hazards and Hazardous Materials (HAZ)
- Hydrology and Water Quality (HYDRO)
- Land Use and Planning (LU)
- Noise (NOISE)
- Population and Housing (POP)
- Public Services and Recreation (PS)
- Transportation and Traffic (TRANS)
- Utilities and Service Systems (UTIL)

Each subchapter is organized into the following sections:

- Environmental Setting offers a description of the existing environmental conditions, providing a baseline against which the impacts of the proposed project can be compared, and an overview of federal, State, regional, and local laws and regulations relevant to each environmental issue.
- Impact Discussion gives an overview of the potential impacts of the proposed project and explains why impacts are found to be significant or less than significant prior to mitigation. Explains the quantitative or qualitative standards, performance levels, or criteria used to evaluate the existing setting with and without the proposed project to determine whether the impact is significant. These thresholds are based primarily on the CEQA Guidelines. This subsection also includes a discussion of cumulative impacts related to the proposed project. Impacts and mitigation measures are numbered consecutively within each topical analysis and begin with an acronym or abbreviated reference to the impact section.

[5] Public Resources Code, Division 2, Geology, Mines and Mining, Chapter 9, Surface Mining and Reclamation Act of 1975, Article 4, State Policy for the Reclamation of Mined Lands, Section 2762(a)(1).

[6] City of Campbell General Plan Map, https://www.ci.campbell.ca.us/DocumentCenter/View/1429/General-Plan-Map?bidId=, accessed August 1, 2018.

THRESHOLDS OF SIGNIFICANCE

As noted above, significance criteria are identified before the impact discussion subsection, under the subsection, "Thresholds of Significance." For each impact identified, a level of significance is determined using the following classifications:

- *Significant (S)* impacts include a description of the circumstances where an established or defined threshold would be exceeded.
- *Less-than-significant (LTS)* impacts include effects that are noticeable, but do not exceed established or defined thresholds, or can mitigated below such thresholds.
- *No impact* describes circumstances where there is no adverse effect on the environment.

For each impact identified as being significant, the EIR identifies mitigation measures to reduce, eliminate, or avoid the adverse effect. If one or more mitigation measure(s) would reduce the impact to a less-than-significant level successfully, this is stated in the EIR. *Significant and unavoidable (SU)* impacts are described where mitigation measures would not diminish these effects to less-than-significant levels. The identification of a program-level significant and unavoidable impact does not preclude the finding of less-than-significant impacts for subsequent projects that comply with the applicable regulations and meet applicable thresholds of significance.

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 reasonably foreseeable impacts not caused by the proposed project. 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 effect 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 reasonably foreseeable projects is not significant, the EIR must briefly indicate why the cumulative impact is not significant.

The cumulative impact discussions in subchapters 4.1 through 4.14 explain the geographic scope of the area affected by each cumulative effect (e.g., immediate project 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, the pertinent geographic study area is the vicinity of the proposed project from which the new development can be publicly viewed and may contribute to a significant cumulative visual effect. In assessing macro-scale air quality impacts, on the other hand, all development within the air basin contributes to regional emissions of criteria pollutants, and basin-wide projections of emissions is the best tool for determining the cumulative effect.

CEQA Guidelines Section 15130 of the CEQA Guidelines permits two different methodologies for completion of the cumulative impact analysis:

- The 'list' approach permits the use of a list of past, present, and probable future projects producing related or cumulative impacts, including projects both within and outside the city; and
- The 'projections' approach allows the use of a summary of projections contained in an adopted plan or related planning document, such as a regional transportation plan, or in an EIR prepared for such a plan. The projections may be supplemented with additional information such as regional modeling.

This cumulative impact in this Draft EIR relies on the list approach of past, present, and probable future projects in the vicinity of the project site that, when considered with the effects of the project, may result in cumulative effects. In some instances, the cumulative analysis discussions contained in subchapters 4.1 through 4.14 include a discussion of the growth projections and references to specific projects as relevant to the impact analysis. As shown in Table 4-1, the City of Campbell has identified five pending projects within the vicinity of the proposed project at the time that the Notice of Preparation for this Draft EIR was issued. Two of the projects included in Table 4-1–the Cresleigh Homes Mixed-Use Development and Office building at 95 East Hamilton Avenue–are not located in close proximity to the project site but are included in the cumulative traffic analysis because they are near the study intersections of San Tomas Expressway/Hamilton Avenue and San Tomas Expressway/Campbell Avenue.

TABLE 4-1 CUMULATIVE PROJECTS WITHIN THE VICINITY OF THE PROPOSED PROJECT

Project Name/Location	Approximate Distance from Project	Project Type	Project Size	Status
Kaiser Medical Office Buildings 250 E. Hacienda Ave., Campbell	0.3 miles	Medical Office	36,750 square feet of medical office space	Finalizing construction
North Forty Specific Plan Bounded by Highway 85/ Highway 17/Lark Avenue/Los Gatos Boulevard, Los Gatos	0.5 miles	Commercial and Residential	Maximum of 501,000 square feet of commercial space (including existing uses) 270 housing units (up to 365 units with State density bonus)	Specific Plan Approved[a]
Samaritan Medical Campus Development Plan San José	0.7 miles	Commercial and Medical Office	475,250 square feet of commercial space, 69,250 square feet of medical office space	Pending
Cresleigh Homes Mixed-Use Development 540-566 E. Campbell Ave., Campbell	1.9 miles	Commercial and Residential	6,512 square feet of commercial space and 59 housing units	Under Review
Office Building 95 E. Hamilton Ave., Campbell	2.3 miles	Office	5,700 square feet of office space	Approved and Under Construction

Notes:
a. Following approval of Phase 1 of the Specific Plan, the Town of Los Gatos is considering amending the Specific Plan in regard to Phase 2 (e.g., allowing a planned development option and allowing a development agreement option with the Town).
Source: City of Campbell, 2018.

The following provides a summary of the cumulative impact setting for each impact area:

- **Aesthetics:** The cumulative setting for visual impacts that can be publicly viewed includes the effects of the proposed project together with other cumulative development projects in the vicinity of the project site.

- Air Quality: The cumulative air quality setting is the regional growth within the San Francisco Bay Area Air Basin.
- Biological Resources: The geographic scope of the cumulative analysis for biological resources is the Santa Clara Valley Habitat Plan, the Permit Area of which includes Los Gatos Creek and Los Gatos Creek County Park abutting the east project site boundary.
- Cultural and Tribal Cultural Resources: Cumulative impacts to cultural resources occur when a series of actions leads to the loss of a substantial type of archaeological, historic, paleontologist, or tribal cultural site, building, or resource.
- Geology, Soils, and Seismicity: The cumulative setting for impacts related to geology and soils is site specific and addressed in each project's geotechnical investigation.
- Greenhouse Gas Emissions: Because GHG emissions are not confined to a particular air basin but are dispersed worldwide, the cumulative analysis focuses on the global impacts.
- Hazards and Hazardous Materials: The cumulative setting for impacts related to hazards and hazardous materials includes Santa Clara County, which is the service area for the Santa Clara County Department of Environmental Health.
- Hydrology and Water Quality: The geographic context used for the cumulative assessment of water quality and hydrology impacts in the area within the City of Campbell that discharges stormwater to the same storm drain system as the project site, with ultimate discharge into the Lower San Francisco Bay.
- Land Use and Planning: The cumulative setting for land use and planning considers the effects of the proposed project when considered along with other projects in the same area of Campbell, Los Gatos, and San José that are pending.
- Noise: The analysis of potential cumulative noise impacts from construction and stationary sources considers the proposed project along with the cumulative projects in the immediate vicinity of the project site. The analysis of cumulative traffic noise levels are based on cumulative traffic conditions used for the traffic impact analysis.
- Population and Housing: Impacts of cumulative growth are considered in the context of potential impacts to population and housing that could occur from a combination of the proposed project, recently approved projects and other projects that are pending a decision in Campbell, Los Gatos, and San José.
- Public Services and Recreation: Cumulative impacts are considered in the context of the growth from the proposed project combined with the estimated growth in the service areas of each service provider (i.e. providers of fire protection, police, school, library, and parks and recreation).
- Transportation and Traffic: The cumulative setting for traffic and circulation applies Existing peak hour volumes plus anticipated forecasted growth for the year 2040 derived from the Santa Clara County Travel Demand Model. Cumulative Year Condition volumes plus net-new Project-generated trips estimated for the proposed office building with multilevel parking structure.

- Utilities and Service Systems: Cumulative impacts are considered in the context of the growth from the proposed project combined with the estimated growth in the service areas of each utility's service area.

4.1 AESTHETICS

This chapter describes the regulatory framework and existing conditions on the project site related to aesthetics, and the potential impacts of the project on aesthetics.

4.1.1 ENVIRONMENTAL SETTING

4.1.1.1 REGULATORY FRAMEWORK

State Regulations

California Building Code

The California Building Code has been codified in the California Code of Regulations (CCR) as Title 24, Part 2. Title 24 is administered by the California Building Standards Commission and is updated every three years. The most current version went into effect in January 2017. The purpose of the California Building Code is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by regulating and controlling the design, construction, quality of materials, outdoor lighting standards, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. The City of Campbell has adopted sections of the California Building Code Title 24, Part 10, according to Chapter 18, California Building Code, of the Campbell Municipal Code.

California State Scenic Highway Program

California Streets and Highways Code Sections 260 through 263 authorize the California State Scenic Highways Program and set forth criteria and procedures for the designation of scenic highways. The nearest designated state scenic highway to the project site is State Route 9 (or Los Gatos-Saratoga Road), about 2.6 miles to the south.[1]

Local Regulations

City of Campbell 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.

[1] California Department of Transportation, California Scenic Highway Mapping System, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm, accessed November 6, 2018.

AESTHETICS

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-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-5.3b	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-5.3d	Commercial Centers: Review the design, use and upgrading of commercial centers via the discretionary permit process, and ensure that conditions of approval are adopted that require businesses to be well kept and operated in a way that limit impacts to adjacent uses.
Goal LUT-7	*Attractive, well-maintained and safe streets, public improvements and utilities.*
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.
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.
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-9.3g	Pedestrian Amenities: Incorporate pedestrian amenities such as plazas, landscaped areas with seating, pedestrian walkways into new developments.
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.
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-10.1c	Outdoor Common Areas: Encourage well-designed and landscaped outdoor common areas for eating, relaxing, or recreation for new projects, and if feasible when building are remodeled or expanded. When possible, the common outdoor areas should adjoin natural features.
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-10.2d	Landscaping as a Theme: Use similar types of trees and landscaping to create a theme within districts or neighborhoods. Medians should also be used to create a theme to distinguish major thoroughfares and prominent streets.

Source: City of Campbell, 2001, City of Campbell General Plan.

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 within the city. The Municipal Code includes zoning districts, such as the Planned Development (P-D) district, that include site specific standards to minimize adverse effects that physical development may incur. The P-D district is an overlay zone that is adopted in locations where high-quality design and designation of open space is desired. Section 21.12.030(a) of the Campbell Municipal Code states that the P-D zoning district is intended to provide development flexibility that is not available in other zoning districts in order to encourage developments designed to harmonize with the existing characteristics on and around the project site. The P-D zoning district also allows the City of Campbell the ability to require a broad range of site-specific standards to further minimize visual impacts associated with new development, which include the following:

- Lighting Design Standards: Chapter 21.15.090 of the Zoning Code contains regulations for exterior lighting, shielding requirements, and design criteria. Exterior lighting must be turned off or significantly dimmed at the close of business hours when the exterior lighting is not essential for security and safety. Shield requirements necessitate that outdoor lighting fixtures must be designed and installed so that light rays are not emitted across property lines, to the extent possible. Lighting design should be compatible with and complimentary to the style of surrounding development and lighting intensity should be the minimum required to serve the tasks for which the fixtures are intended.
- 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. The following standards are required to reduce adverse aesthetic impacts of lighting in new development and redevelopment projects:
  - Light or glare on-site shall be shielded or modified to prevent emission of light or glare beyond the property line.
  - The placement of outdoor lights shall eliminate spillover illumination or glare onto adjoining properties and shall not interfere with operation or enjoyment of adjoining properties.
- Site Development Standards: Chapter 21.18 of the Municipal Code establishes development standards related to aesthetics, including bicycle and pedestrian safety, lighting, refuse storage, and screening. The following site development standards are required as outlined in Chapter 21.18 of the Municipal Code:
  - Bicycle and Pedestrian Safety. New and redevelopment projects shall provide safe and efficient bicycle and pedestrian connections on-site, between parking areas, buildings, street sidewalks, and to existing or planned public right-of-way facilities, and shall provide pedestrian passage between street-front sidewalks and rear-lot parking areas.

- **Lighting.** Exterior lighting shall be architecturally integrated with the character of the structure, be energy-efficient and fully shielded or recessed, and must completely turn off or be significantly dimmed at the close of business hours when the exterior lighting is not essential for security and safety, and when located on parcels within nonresidential zoning districts. Any permanent lighting shall not blink, flash, or be of unusually high intensity or brightness. Lighting fixtures shall be appropriate in height, intensity, and scale to the use they are serving. All outdoor lighting fixtures shall be designed and installed so that light rays are not emitted across property lines, to the extent possible.
- **Refuse and Recycling Storage Areas.** Refuse and recycling containers shall be located in an enclosure constructed and consisting of a concrete floor, surrounded by a maximum 6-foot-high masonry wall with a solid gate. All refuse and recycling storage areas.

- **Landscaping Requirements**: Section 21.26.030 of the Municipal Code includes general landscaping requirements for all zoning districts and properties except when otherwise provided for by a development agreement or area plan, as follows:
  - **Expansion of Use or Structure.** Whenever an existing use or structure is expanded, required landscaped areas shall be provided to the greatest extent feasible, including parking lot landscaping.
  - **Front Yard Areas.** All required front yard areas in all zoning districts shall be landscaped, except driveway areas.
  - **Minimum Size.** Trees shall be a minimum of 15-gallon size and shrubs shall be a minimum of five-gallon size.
  - **Planter Areas.** Planter areas adjacent to driveways or parking areas shall be protected by 6-inch concrete curbs or other acceptable barriers, as approved by the Community Development Director. Nonporous materials shall not be placed under plants or trees.
  - **Irrigation Required.** Landscaped areas shall be provided with a permanent automatic underground irrigation system, or other acceptable irrigation systems as approved by the community development director.
  - **Water-Efficient Landscaping.** Landscaping shall be consistent with Campbell's water-efficient landscape guidelines.
  - **Mix of Materials.** Required landscaping shall consist of turf, ground cover, shrubs, trees and boulders in combination to provide attractive screening of parking lots and other paved areas. Required landscaping shall consist of a variety of species and sizes.
  - **Street Frontage.** Landscape areas along street frontages shall be measured at right angles to the street and shall be exclusive of any parking overhang.
  - **Parking Lot Landscaping.** Parking lot landscaping shall be required in compliance with Chapter 21.28 (Parking and Loading).
  - **Additional Landscaping.** If the required amount of frontage and/or perimeter landscaped areas is not enough to meet the minimum amount of landscaping required for the zoning district, additional landscaping shall be provided in other locations on the site.

- Retain Mature Trees. New development shall retain or incorporate existing mature trees and vegetation into the proposed site plan to the greatest extent feasible.

- 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 and Architectural Review: Chapter 21.42 of the Municipal Code sets forth review procedures and standards for new development to ensure compliance with the General Plan, and to minimize potential adverse effects new development may have on existing neighborhoods. This section of the Municipal Code sets forth the goal of ensuring proposed development will complement the design characteristics of surrounding neighborhoods to support an environment of stable and desirable character, and to minimize potential visual impacts on neighboring properties.

4.1.1.2 EXISTING CONDITIONS

Visual Character

The project site is located to the east of Dell Avenue between Division Street and Knowles Drive. Prominent visual features of the local landscape are described below, along with the visual and aesthetic character of the project site.

Visual Features of the Project Neighborhood

Development around the project site consists of primarily one-story commercial, office, and light industrial buildings surrounded by surface parking to the north, south, and west. The light industrial building to the north of the project site is a one-story building consisting of white and brown cinderblock materials with flat roofs and industrial garage doors. Buildings to the south include one-story structures with light brown stucco and stone exteriors with terracotta roofing. To the west of the project site, across Dell Avenue, the one-story office buildings consist of white and brown exteriors with flat roofs. This corridor of Dell Avenue is lined with mature trees and landscaped strips, with sidewalks only located to the north and south of the project site.

The project site is bounded by Los Gatos Creek County Park, including Los Gatos Creek, to the east. The park includes the Los Gatos Creek Trail that runs adjacent to the eastern edge of the project site and consists of light concrete material. The Los Gatos Creek consists of a perennial stream surrounded by riparian vegetation. A series of three reservoirs is located to the north of the project site, and a small dam is located to the south.

Visual Features of the Project Site

The project site is located along Dell Avenue, a commercial/industrial collector street in the City of Campbell. The project site was developed with the existing building in 1975 and has operated as an office building since its initial construction. The 4.5-acre project site contains a 71,620-square-foot office building, surrounded by a surface parking lot. The existing building varies in height, with areas that are single story, two stories, and three stories. The existing building is finished with a tan stucco and grey trim exterior.

Existing landscaping includes 26 trees and a variety of shrubs comprised of ornamental species.[2] The largest landscaped areas on-site include a landscaped area along the southeast edge of the project site, a landscaped strip along Dell Avenue, and a landscaped area near the center of the site on the northern edge of the building. Additional, smaller landscaped areas are located along the perimeter of the building, project site, and the parking lot. Large evergreen street trees provide shade along the Dell Avenue boundary of the site and a landscaped buffer exists between the street and the parking lot. This landscape buffer also contains street signs, street lighting posts, fire hydrants, and utility infrastructure.

Scenic Vistas

Scenic vistas are typically panoramic views, such as of mountain ranges, urban skylines, open bodies of water, valley floors, or seacoasts. Limited, intermittent views of the Santa Cruz Mountains are visible between buildings and trees from parts of the project site. Foreground views of Los Gatos Creek County Park are visible from the east part of the project site. The General Plan does not identify scenic views or vistas within the City of Campbell.

Light and Glare

The existing office building and surface parking lot contains outdoor lighting consisting of building exterior and parking lot lighting. The building is partially occupied, and therefore the interior produces light in addition to vehicle lights that are present on or near the site during both day and nighttime hours.

Dell Avenue along the western boundary is lined with street lighting to illuminate the roadways at night. Surrounding office, commercial, and light industrial building light sources include building lights, parking lot security lights, vehicle lights, and street lights. There are no electrical signs, billboards, or flashing or oscillating lighting sources present on-site or in the immediate site vicinity.

4.1.2 IMPACT DISCUSSION

4.1.2.1 STANDARDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in Section 4.1.2.2 uses the following standards of significance. The proposed project would result in a significant aesthetic impact if it would:

[2] Walter Levison Consulting Arborist, 2019, Assessment of and Recommendations for 26 Protected-Size Trees.

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. Expose people on- or off-site to substantial light or glare, which would adversely affect day or nighttime views in the area.

4.1.2.2 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance as identified in Section 4.1.2.1 above.

AES-1 The proposed project would not have a substantial adverse effect on a scenic vista.

The General Plan does not identify scenic views or vistas within the City of Campbell. The closest scenic vistas are expansive views toward the Santa Cruz Mountains, which are located approximately three miles south of the project site. Most of the mountain range is blocked by buildings and trees on or nearby the project site, and limited or intermittent views of the mountains are visible from the site. Furthermore, views of the Diablo Range to the east of Santa Clara Valley are blocked by buildings and trees on or nearby the project site. Los Gatos Creek is adjacent to and visible from the project site, however the view of the creek is limited due to vegetation and topography, and does not provide a sweeping view that offers a scenic vista. Therefore, project development would not substantially detract from a scenic vista, and impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

AES-2 The proposed project would not substantially degrade the view from a scenic highway, including, but not limited to, trees, rock outcroppings, and historic buildings.

The nearest designated State scenic highway to the project site is State Route 9, about 2.6 miles to the south. The project site is not visible from State Route 9. Therefore, project development would not impact scenic resources within State Route 9, and *no impact* would occur.

Significance without Mitigation: No impact.

AES-3 The proposed project would alter but not degrade the existing visual character or quality of the site and its surroundings.

The proposed project would demolish the existing office building on the project site and develop a four-story, 161,870-square-foot office building. The existing structure is a one- to three-story, 71,620-square-

foot office building located in the southern portion of the project site. The proposed office building would be located in the western portion of the project site along Dell Avenue, with a five-story parking garage located in the northern portion of the project site, with surface parking and landscaping throughout the remainder of the site.

Figures 3-6 and 3-7 in Chapter 3, Project Description, of this Draft EIR show elevations of the proposed office building and parking garage from the north, south, east, and west. Additionally, Figures 3-5 and 3-10 in Chapter 3, Project Description, include the proposed site plan and proposed landscaping and open space plan, respectively, which illustrate the overall characteristics of the proposed project and how it relates to the surrounding environment.

The project site is located within the C-M zoning district (Municipal Code Section 21.10.070). However, the applicant is requesting a zoning map amendment to change the zoning to Planned Development (P-D). The P-D zoning district is intended to provide a degree of flexibility that is not available in other zoning districts, and to allow a use or development, or a combination of uses or types of developments, that are determined to be in conformance with the underlying land use designation of the General Plan. The P-D Ordinance allows for flexible development standards in exchange for a project that provides an optimum quantity and use of open space and demonstrates good design that is consistent with site characteristics. However, given the lack of development standards in the P-D Ordinance, the City typically refers to the zoning standards that relate to the underlying General Plan designation as a benchmark for determining compatibility with site characteristics. The development standards within the C-M zoning district include a maximum building height of 45 feet, a maximum floor area ratio (FAR) of 40 percent, and minimum setbacks of 20 feet in the front and 10 feet on the sides and rear of the property. As discussed below, the proposed project is seeking flexibility for proposed height, floor area, and setbacks that are inconsistent with the C-M zoning district.

- Height: The proposed building would be 72 feet at the height of the mechanical screening, and 60 feet to the top of the roof slab. The proposed parking garage would be 43.5 feet at its highest point. While the garage is consistent with the C-M height standards, the proposed office building would exceed the 45-foot maximum height allowed in the C-M zoning district by 15 feet.
- Floor Area: The proposed floor area of 161,870 (83 percent FAR) exceeds the maximum 40 percent FAR allowance in the C-M zoning district by approximately 84,222 square feet.
- Setbacks: The proposed project would provide a 38-foot setback between the office building and the front property line along Dell Avenue, a 43-foot setback between the parking garage and the rear property line, a 67-foot setback between the building and the south/right property side line, and a 5-foot setback between the garage and the north/left side property line. The project is consistent with the CM zoning standards for the front, rear, and right side setbacks; however, the proposed 5-foot setback for the garage is inconsistent with the minimum 10-foot left side setback requirement in the C-M zoning district.

The aesthetics of the site will be impacted by the proposed height, floor area and setbacks, the massing of which would represent a substantial change to the existing visual character of the project site. Although the proposed massing would be inconsistent with the characteristics of the natural environment along the Los Gatos Creek trail, the massing is generally consistent with the overall urban character of the

surrounding office developments. Aesthetics will be further impacted by the parking garage adjacency to the public access easement which runs along the entire northern boundary of the site. However, this pathway is not currently characterized by highly prominent visual features, as it is currently flanked by surface parking lots and chain link fencing.

Furthermore, the City Council, upon recommendation of the Planning Commission, must be able to show that the application meets the approval criteria identified in the Campbell Municipal Code Section 21.12.030, in order to approve the requested P-D permit. In addition to height, floor area, and setbacks, the aesthetics of the site are controlled through the City's other development standards. Chapter 21.18, Site Development Standards and Chapter 21.42, Site and Architectural Review, of the Zoning Code aim to minimize potential adverse effects that new development may have on existing neighborhoods. Chapter 21.18 requires bicycle and pedestrian safety, lighting, and refuse and recycling storage areas that minimize visual impacts on surrounding properties. Redevelopment projects must provide safe and efficient bicycle and pedestrian connections on-site between parking areas, buildings, street sidewalks, and shall provide pedestrian passage between street-front sidewalks and rear-lot parking areas. Exterior lighting shall be integrated into the character of the structure, energy efficient and fully shielded, and turned off when not essential to safety or security. Refuse and recycling containers are required to be located in an enclosed structure consisting of a concrete floor surrounded by a maximum 6-foot high masonry wall with a solid gate. The proposed project would include the construction of a new sidewalk and walkways along Dell Avenue. Exterior lighting would be located on the outside of the building, outside and within the parking garage, and along Dell Avenue, with modern style fixtures that complement the building architecture, and black in color to minimize visibility against the trees and building. The refuse and recycling storage area would be located on the northwest corner of the parking garage, surrounded by concrete walls and a steel door frame in the front. The proposed project design would meet the bicycle and pedestrian safety, lighting, and refuse and recycling requirements of Chapter 21.18. Chapter 21.42 requires development to complement the design characteristics of surrounding neighborhoods to minimize potential visual impacts on neighboring properties. The neighborhood surrounding the project site consists of a mix of commercial, office, and light industrial buildings that are one-story in height, with a County park to the east. The exterior of the surrounding buildings includes a combination of white and brown exteriors ranging from stucco to cinderblock materials, with both flat and slanted roofs. The proposed project would include a four-story building with large glass windows, simulated wood panels, and charcoal gray, silver, and white metal panels (see Figures 3-8 and 3-9 in Chapter 3, Project Description, of this Draft EIR). The parking garage would use similar materials as the office building. The use of brick, black steel, corrugated metal, and wood panel building materials is generally consistent with the overall urban character of the surrounding office developments.

Section 21.26.030 of the Municipal Code includes general landscaping requirements for all zoning districts and properties except when otherwise provided for by a development agreement or area plan, as discussed earlier in this Draft EIR. Chapter 21.32 requires the proposed project to replace any trees that are removed from the site. The project is proposing 46,968 square feet of landscaping, including continuous landscaping along the four edges of the project site, in compliance with Section 21.26.030 of the Municipal Code. Project development would also involve removal of eight (8) of the 26 existing trees on-site. However, these trees would be replaced with 111 new trees on-site, in compliance with Chapter 21.32 of the Municipal Code. Trees planted along the eastern site boundary would help to screen the proposed project from the adjacent creek corridor and trail.

Construction of the proposed project would alter the existing visual character of the project site with the additional height of the proposed office building, and construction of the parking garage. However, the proposed project would require City review and approval of a P-D permit to deviate from the C-M height, floor area, and setback requirements, and to ensure high-quality standards are adhered to on the site. Although the height and floor area of the proposed project would have an impact on visual resources both looking onto and from the site, the proposed building materials are generally consistent with the overall urban character of the surrounding office developments. Moreover, the designated open space and comprehensive landscaping plan work together to reduce the impact the proposed project could have on the existing visual characteristics of the site, as allowed through adoption of a P-D zoning designation and P-D Permit. Therefore, impacts to the existing visual character or quality of the site and its surroundings would be considered *less than significant.*

Significance without Mitigation: Less than significant.

AES-4 The proposed project would not expose people on- or off-site to substantial light or glare which would adversely affect day or nighttime views in the area.

The area surrounding the project site to the north, west, and south is developed with a mix of commercial, office, and light industrial development, and the lighting associated with these uses includes street lighting, building lights, security lighting, and vehicle lights. The Campbell Municipal Code Section 21.18.090, Lighting Design Standards, regulates exterior lighting with the objective of controlling nighttime light spillage. This section states that outdoor lighting fixtures shall be designed to eliminate light ray from spilling over property lines. The proposed project would include a mix of pole-mounted lights and overhead soffit lighting that will provide a safe level of illumination around the buildings, parking lots, and public open space, without adding a substantial new source of light off-site. Development of the proposed project would be required to abide by the City of Campbell Municipal Code Section 21.18.090 to ensure the neighboring businesses and creek are not adversely affected by the presence of light on-site, which includes shielding requirements which ensure exterior lighting is designed and installed so that light rays are not emitted across property lines.

In addition to lighting regulations set forth in the City of Campbell Municipal Code, the proposed project must comply with regulations set forth in the CBC to reduce light impacts on neighboring business and commercial uses. The CBC regulates lighting standards for non-residential development in the State of California, including the use of high-efficiency lighting, shielded or hooded in a way that reduces light or glare pollution from spilling onto adjacent properties. The lighting proposed by the project includes 15- to 18-foot poles, with 180 degree cut-off shields, placed at the perimeter of the lot facing inward to minimize light impacts on adjacent properties.

To the east, the project site is adjacent to the Los Gatos Creek corridor, which is a natural environment and is unlighted. The project would result in a significant impact if on-site lighting would spill over into the trail corridor, changing the experience for trail users. As described above, City of Campbell Municipal Code Section 21.18.090 includes shielding requirements to ensure exterior lighting is designed and installed so that light rays are not emitted across property lines. This requirement would ensure minimal light spillage

onto the adjacent Los Gatos Creek Trail. Spill lighting crossing the east site boundary into the Los Gatos Creek County Park would generally be 0.1 foot-candle or less (see Figure 4.1-1, Photometric Study). Moonlight is typically about 0.03 foot-candles;[3] therefore, proposed outdoor lighting would not be substantially brighter than the natural setting and would not adversely affect nighttime views in the area, including in Los Gatos Creek County Park east of the site.

Glass in the proposed office building would be transparent and would not have a highly reflective coating, and thus would not generate substantial daytime or nighttime glare.

The proposed project would likely increase the number of and intensity of lighting in the project site, but it also would install lighting to meet current standards that regulate light spillage. Provided that the proposed project is consistent with the Municipal Code lighting standards, and the CBC, impacts from lighting would be considered *less-than-significant.*

Significance without Mitigation: Less than significant.

4.1.3 CUMULATIVE IMPACTS

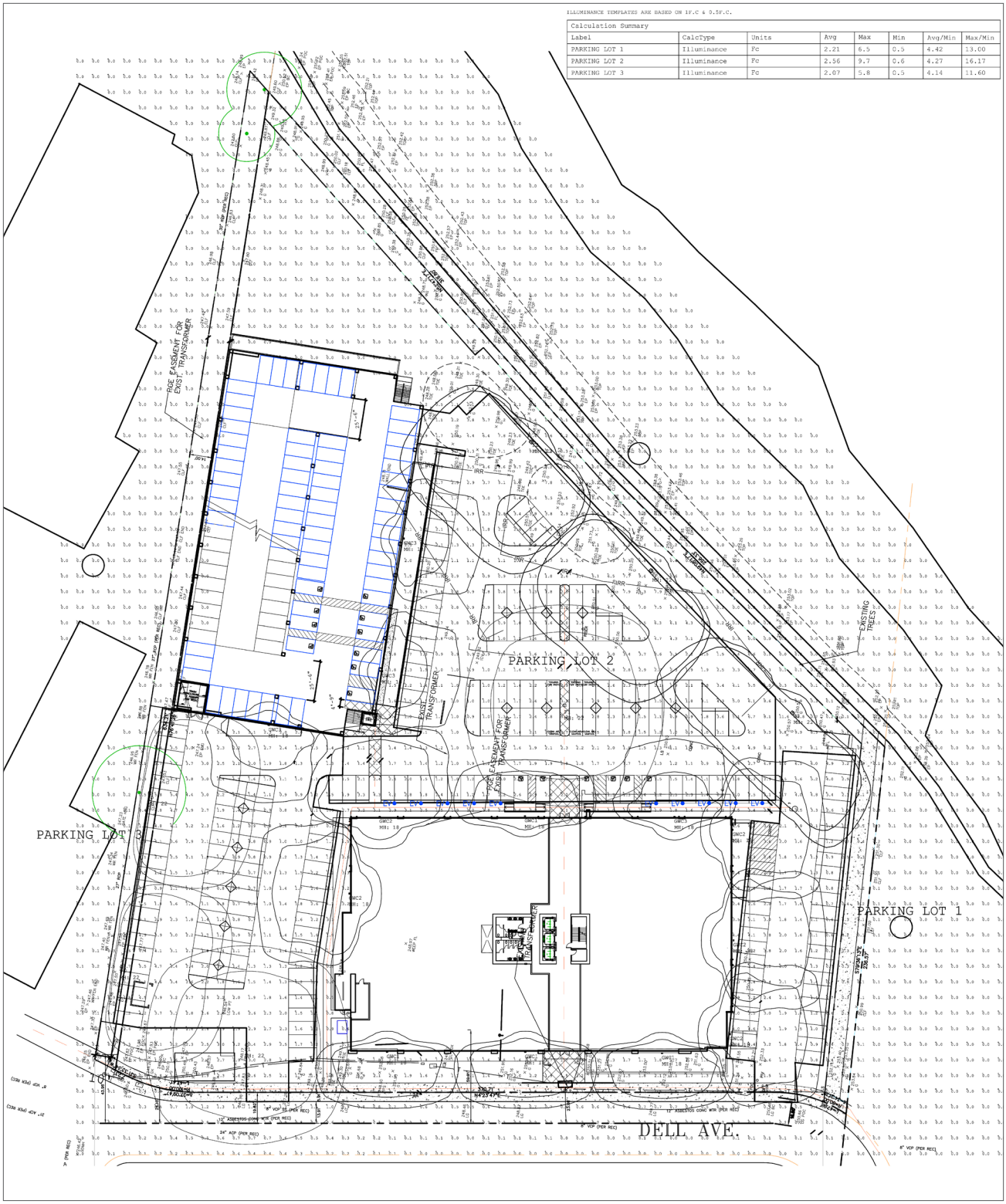
AES-5	**Project development would not contribute to significant cumulative impacts to aesthetics.**

This cumulative analysis considers the effects of the proposed project together with other cumulative development projects in the vicinity of the project site.

The project site is currently developed and surrounded by urban uses, and is not visible from a State-designated scenic highway. The project site is visible from the Los Gatos Creek County Trail; however the view of the creek is not an expansive, sweeping view that offers a scenic vista when viewed from the project site. Therefore, the project would not contribute to any cumulative impacts associated with scenic highways or scenic vistas.

The proposed project would redevelop a site currently developed with a partially occupied office building, and modify the visual characteristics of the project area. Although the project would increase the level of development intensity and activity on the site, the project would comply with applicable policies and regulations intended to ensure that redevelopment of the site does not degrade the existing visual environments, including landscaping and site development standards. Furthermore, for the policies that the project would not comply with, the approval of a P-D permit would be required, which would enable further review by the City to ensure that visual quality is maintained on the site, as discussed under impact discussion AES-3 above. As determined under impact discussion AES-3, the proposed development would complement the overall urban character of the surrounding office developments.

[3] County of San Diego, 2009, Guidelines for Determining Significance and Report Format and Content Requirements: Dark Skies and Glare, https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/Dark_Skies_Guidelines.pdf, accessed November 27, 2018.



Source: CHANG Architecture, February 6, 2018. PlaceWorks, 2018.

0 120
Scale (Feet)

Figure 4.1-1
Photometric Study

As described in Chapter 4.0, Environmental Analysis, the cumulative development projects included within the vicinity of the proposed project include the Medical Office Buildings at 250 East Hacienda Avenue, North Forty Specific Plan, Samaritan Medical Campus Development Plan, Cresleigh Homes Mixed-Use Development, and an Office Building at 95 East Hamilton Avenue. The five cumulative projects are not visible from the project site and are required to comply with zoning, site development, lighting, and landscaping standards. Therefore the project would not, in combination with cumulative development projects, change the visual character of the site vicinity.

Four of the cumulative projects are infill projects that are compatible with existing levels of development intensity on the respective project sites. The North Forty Specific Plan is located on a site that currently includes agricultural, commercial, and residential uses. The site is surrounded by State Routes 17 and 85 to the north and west, with residential uses to the south and east. The approved specific plan includes implementation of a mix of commercial and residential uses on the plan site, which will change the visual character of the site. However, future development on the site will be required to comply with the Town of Los Gatos Town Code and site development standards, which will ensure consistency with the existing neighborhood. Similar to the Campbell Municipal Code Section 21.15.090, Los Gatos Town Code Section 29.10.09015 addresses light spillage and requires the control of outdoor lighting so that lights will be shielded from shining directly onto other properties or the public right-of-way. All cumulative projects would be subject to discretionary review procedures by the City and would be required to use high-quality building materials, reduce lighting and glare, and provide landscaping and screening that enhance the visual character of the site. Therefore, cumulative development projects would not create citywide cumulative impacts.

The proposed project would likely increase the nighttime lighting in the project area. However, the project is in an urbanized area within Campbell, where controlled sources of lighting are generally acceptable for safety, security, and/or convenience reasons. Light spill into the Los Gatos Creek County Park will be limited to 0.1 foot-candle or less, which would not adversely affect the natural environment. The proposed lighting would be typical of urban uses and all lighting sources would be installed in compliance with State and local development standards to ensure that individual projects do not result in a significant lighting pollution impact. Therefore, light level on the project site and its vicinity is not expected to dramatically increase to cause substantial cumulative adverse impact. The cumulative impact would be *less-than-significant*.

Significance without Mitigation: Less than significant.

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4.2 AIR QUALITY

This chapter includes an evaluation of the potential environmental consequences associated with the construction and operation of the proposed project that are related to air quality. Additionally, this chapter describes the environmental setting, including regulatory framework and the existing air quality setting and baseline conditions, and identifies mitigation measures, if required, that would avoid or reduce significant impacts.

This chapter is based on the methodology recommended by the Bay Area Air Quality Management District (Air District) for project-level review. The analysis focuses on air pollution from regional emissions and localized pollutant concentrations from buildout of the proposed project. In this chapter "emissions" refers to the actual quantity of pollutant, measured in pounds per day or tons per year (tpy) and "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 ($\mu g/m^3$). Construction criteria air pollutant emissions modeling is included in Appendix B, Air Quality and Greenhouse Gas Modeling, of this Draft EIR. The construction health risk assessment (HRA) is included in Appendix C, Health Risk Assessment, of this Draft EIR.

4.2.1 ENVIRONMENTAL SETTING

4.2.1.1 AIR POLLUTANTS OF CONCERN

Criteria Air Pollutants

Pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and State law under the federal Clean Air Act ("National") and California Clean Air Act, respectively. The pollutants emitted into the ambient air by stationary and mobile sources are categorized as primary and/or secondary pollutants. Primary air pollutants are emitted directly from sources. 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) are primary air pollutants. 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. 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. Each of the primary and secondary criteria air pollutants and its known health effects is described here.

- 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 when a vehicle is moving at low speeds. 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 reduced oxygen reaching the brain, heart, and other body tissues. This condition is especially critical 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 even death.[1]

- **Reactive Organic Gases (ROGs)** are compounds composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of ROGs. Other sources of ROGs include 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 rather 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, the Air District 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 NOx. 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_2 is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure.[5]
- **Sulfur Dioxide (SO_2)** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels. It enters the atmosphere as a result of 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, together these pollutants are referred to 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 concentrations and when combined with particulates, SO_2 may do greater harm by injuring lung tissue.[2]
- **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 now recognized and regulated. Inhalable coarse particles, or PM_{10}, include the particulate matter with an aerodynamic diameter of 10 microns (i.e., 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 (i.e., 2.5 millionths of a meter or 0.0001 inch).

  Some particulate matter, such as pollen, occurs naturally. In the San Francisco Bay Area Air Basin (SFBAAB) 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 United States Environmental

[1] Bay Area Air Quality Management District, 2017, Revised California Environmental Quality Act Air Quality Guidelines.
[2] Bay Area Air Quality Management District, 2017, Revised California Environmental Quality Act Air Quality Guidelines.

Protection Agency's (EPA) scientific review concluded that $PM_{2.5}$ penetrates even more deeply into the lungs, and this is more likely to contribute to health effects—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 particulates in the SFBAAB. Wood burning in fireplaces and stoves is another large source of fine particulates.[7]

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; 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. There has been emerging evidence that even smaller particulates with an aerodynamic diameter of <0.1 microns or less (i.e., ≤0.1 millionths of a meter or <0.000004 inch), known as ultrafine particulates (UFPs), have human health implications, because 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 or 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.

- **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 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 to the formation of this pollutant. 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 hours. 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 and trees and materials such as rubber and fabrics.[3]
- **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 phasing 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. The health impacts associated with lead exposure included neurodevelopmental impairment disorders in children and increase blood pressure in adults and cancer.[4] Because emissions of lead are found only in projects that are permitted by the Air District, lead is not an air quality of concern for the proposed project.

[3] Bay Area Air Quality Management District, 2017, Revised California Environmental Quality Act Air Quality Guidelines.

[4] California Air Resources Board, 2001, Risk Management Guidelines for New, Modified, and Existing Sources of Lead. https://www.arb.ca.gov/toxics/lead/mainandappend.pdf, accessed January 30, 2019.

Toxic Air Contaminants

At the time of the last update to the toxic air contaminant (TAC) list in December 1999, CARB had designated 244 compounds as TACs.[5] Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control measures. The majority of the estimated health risks from TACs can be attributed to relatively few compounds; the most important compounds being particulate matter from diesel-fueled engines.

Diesel Particulate Matter

In 1998, CARB identified DPM as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particles are 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. According to the Air District, PM emitted from diesel engines contributes to more than 85 percent of the cancer risk within the SFBAAB and cancer risk from TACs is highest near major diesel PM sources.[6]

4.2.1.2 REGULATORY FRAMEWORK

Ambient air quality standards have been adopted at federal and State levels for criteria air pollutants. In addition, both the federal and State governments regulate the release of TACs. The City of Campbell is in the SFBAAB and is subject to the rules and regulations imposed by the Air District, the National AAQS adopted by the EPA, and the California AAQS adopted by the CARB. Federal, State, regional, and local laws, regulations, plans, or guidelines that are potentially applicable to the proposed project are summarized below.

Federal and State Regulations

Ambient Air Quality Standards

The Clean Air Act was passed in 1963 by the United States Congress and has been amended several times. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States. The Clean Air Act allows states to adopt more stringent standards or to include other pollutants. 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

[5] California Air Resources Board, 1999, Final Staff Report: Update to the Toxic Air Contaminant List.

[6] Bay Area Air Quality Management District, 2014, Improving Air Quality & Health in Bay Area Communities, Community Air Risk Evaluation Program Retrospective & Path Forward (2004-2013).

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.

TABLE 4.2-1 AMBIENT AIR QUALITY STANDARDS FOR CRITERIA POLLUTANTS

Pollutant	Averaging Time	California Standard[a]	Federal Primary Standard[b]	Major Pollutant Sources
Ozone (O_3)[c]	1 hour	0.09 ppm	*	Motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.070 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 Arithmetic Mean	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	*	0.030 ppm	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	0.075 ppm	
	24 hours	0.04 ppm	0.14 ppm	
Respirable Coarse 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 ($PM_{2.5}$)[d]	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 Quarter	*	1.5 µg/m^3	
	Rolling 3-Month Average	*	0.15 µg/m^3	
Sulfates (SO_4)[e]	24 hours	25 µg/m^3	*	Industrial processes.

TABLE 4.2-1 AMBIENT AIR QUALITY STANDARDS FOR CRITERIA POLLUTANTS

Pollutant	Averaging Time	California Standard[a]	Federal Primary Standard[b]	Major Pollutant Sources
Visibility Reducing Particles	8 hours	ExCo =0.23/km visibility of 10≥ miles	No Federal Standard	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of 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.
Hydrogen Sulfide	1 hour	0.03 ppm	No Federal Standard	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	No Federal Standard	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. California standards for O_3, CO (except 8-hour Lake Tahoe), SO_2 (1 and 24 hour), NO_2, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
b.National standards (other than O_3, PM, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.
c. On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
d. On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM_{10} standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
e. On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. The 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
Source: California Air Resources Board, 2017, March, Short-Lived Climate Pollutant Reduction Strategy, https://www.arb.ca.gov/cc/shortlived/meetings/03142017/final_slcp_report.pdf, accessed December 5, 2018.

California has also adopted a host of other regulations that reduce criteria pollutant emissions, including:

- Assembly Bill (AB) 1493: Pavley Fuel Efficiency Standards
- Title 20 California Code of Regulations (CCR): Appliance Energy Efficiency Standards
- Title 24, Part 6, CCR: Building Energy Efficiency Standards
- Title 24, Part 11, CCR: Green Building Standards Code

Tanner Air Toxics Act and Air Toxics "Hot spot" Information and Assessment Act

Public exposure to toxic air contaminants (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 defines 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.

Under AB 2588, 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 HRA, and if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.

CARB has promulgated the following specific rules to limit TAC emissions:

- 13 CCR Chapter 10, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.
- 13 CCR Chapter 10, Section 2480, Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools.
- 13 CCR Section 2477 and Article 8, Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate.

Regional Regulations

The State is divided into air districts. These agencies are county or regional governing authorities that have primary responsibility for controlling air pollution from stationary sources. CARB and local air districts are also responsible for developing clean air plans to demonstrate how and when California will attain AAQS established under both the federal and California Clean Air Acts. In general, attainment plans contain a discussion of ambient air quality data and trends; a baseline emissions inventory; future year projections of emissions, which account for growth projections and already adopted control measures; a comprehensive control strategy of additional measures needed to reach attainment; an attainment demonstration, which generally involves complex modeling; and contingency measures. Plans may also

include interim milestones for progress toward attainment. The Air District is the agency responsible for assuring that the National and California AAQS are attained and maintained in the SFBAAB, which is one of 15 air basins in the State. The SFBAAB 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.

Bay Area Clean Air Plan

The Air District prepares air quality management plans to attain ambient air quality standards in the SFBAAB. The Air District prepares ozone attainment plans for the National O_3 standard and clean air plans for the California O_3 standard. The Air District prepares these air quality management plans in coordination with Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC). The Air District adopted the 2017 *Clean Air Plan, Spare the Air, Cool the Climate* on April 19, 2017, making it the most recent adopted comprehensive plan. The 2017 Clean Air Plan incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools.

- The 2017 Clean Air Plan serves as an update to the adopted Bay Area 2010 Clean Air Plan and continues in providing the framework for the SFBAAB to achieve attainment of the California and National AAQS. The 2017 Clean Air Plan updates the Bay Area's ozone plan, which is based on the "all feasible measures" approach to meet the requirements of the California Clean Air Act. It sets a goal of reducing health risk impacts to local communities by 20 percent by 2020. A comprehensive multipollutant control strategy has been developed to be implemented in the next 3 to 5 years to address public health and climate change and to set a pathway to achieve the 2050 vision. The control strategy includes 85 control measures to reduce emissions of ozone, particulate matter, TACs, and greenhouse gas (GHG) emissions from a full range of emission sources. These control measures cover the following sectors: 1) stationary (industrial) sources; 2) transportation; 3) energy; 4) agriculture; 5) natural and working lands; 6) waste management; 7) water; and 8) super-GHG pollutants. Overall, the proposed control strategy is based on the following key priorities: [7]Reduce emissions of criteria air pollutants and toxic air contaminants from all key sources.
- Reduce emissions of "super-GHGs" such as methane, black carbon, and fluorinated gases.
- Decrease demand for fossil fuels (gasoline, diesel, and natural gas).
- Increase efficiency of the energy and transportation systems.
- Reduce demand for vehicle travel, and high-carbon goods and services.
- Decarbonize the energy system.
- Make the electricity supply carbon-free.
- Electrify the transportation and building sectors.

[7] Bay Area Air Quality Management District, 2017, Final 2017 Clean Air Plan, Spare the Air, Cool the Climate: A Blueprint for Clean Air and Climate Protection in the Bay Area, http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans, accessed July 18, 2018.

Air District Community Air Risk Evaluation Program

The Community Air Risk Evaluation (CARE) program was initiated in 2004 to evaluate and reduce health risks associated with exposure to outdoor TACs in the Bay Area. Based on findings of the latest report, DPM was found to account for approximately 85 percent of the cancer risk from airborne toxics. Carcinogenic compounds from gasoline-powered cars and light duty trucks were also identified as significant contributors: 1,3-butadiene contributed 4 percent of the cancer risk-weighted emissions, and benzene contributed 3 percent. Collectively, five compounds—diesel PM, 1,3-butadiene, benzene, formaldehyde, and acetaldehyde—were found to be 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 CARB's diesel regulations. Overall, cancer risk from TAC dropped by more than 50 percent between 2005 and 2015, when emissions inputs accounted for state diesel regulations and other reductions.[8]

Modeled cancer risks from TAC in 2005 were highest near sources of DPM: near core urban areas, along major roadways and freeways, and near maritime shipping terminals. Peak modeled risks were found to be located east of San Francisco, near West Oakland, and near the Maritime Port of Oakland. The Air District has identified seven impacted communities in the Bay Area; however, Campbell lies outside of these seven impacted communities.

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.[9] Currently CARB does not have certified emission factors or an analytical test method for acrolein. Since the appropriate tools needed to implement and enforce acrolein emission limits are not available, the Air District does not conduct health risk screening analysis for acrolein emissions.[10]

Air District Rules and Regulations

The Air District's Regulation 7, Odorous Substances, places general limitations on odorous substances and specific emission limitations on certain odorous compounds. Odors are also regulated under Air District 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,

[8] Bay Area Air Quality Management District, 2014, Improving Air Quality & Health in Bay Area Communities, Community Air Risk Program Retrospective & Path Forward (2004 – 2013), http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE_Retrospective_April2014.ashx, accessed July 18, 2018.

[9] Bay Area Air Quality Management District, 2006, Community Air Risk Evaluation Program, Phase I Findings and Policy Recommendations Related to Toxic Air Contaminants in the San Francisco Bay Area, http://www.baaqmd.gov/Divisions/Planning-and-Research/%20%20%20%20%20%20%20%20%20%20%20%20%20%20%20%20Planning-Programs-and-Initiatives/CARE-Program/~/media/54D434A0EB8348B78A71C4DE32831544.ashx, accessed July 18, 2018.

[10] Bay Area Air Quality Management District, 2010, Air Toxics NSR Program, Health Risk Screening Analysis Guidelines. http://www.baaqmd.gov/~/media/Files/Engineering/Air%20Toxics%20Programs/hrsa_guidelines.ashx, accessed July 18, 2018.

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 the Air District's Rule 1-301, a facility that receives three or more violation notices within a 30-day period can be declared a public nuisance.

In addition to Regulation 7 and the rules described above, the Air District administers a number of specific regulations on various sources of pollutant emissions that would apply to individual development projects allowed under the proposed project, including:

- Regulation 2, Rule 2, New Source Review
- Regulation 2, Rule 5, New Source Review of Toxic Air Contaminants
- Regulation 6, Rule 1, General Requirements
- Regulation 6, Rule 2, Commercial Cooking Equipment
- Regulation 8, Rule 3, Architectural Coatings
- Regulation 8, Rule 4, General Solvent and Surface Coatings Operations
- Regulation 8, Rule 7, Gasoline Dispensing Facilities
- Regulation 11, Rule 2, Asbestos, Demolition, Renovation and Manufacturing)

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. VTA's latest congestion management program (CMP) is the 2017 Congestion Management Program Document. VTA's 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, VTA's updated CMP includes multi-modal performance standards and trip reduction and transportation demand management strategies consistent with the goal of reducing regional vehicle miles traveled in accordance with Senate Bill 375. The 2017 CMP also includes a discussion of Senate Bill 743 implementation and relationship to the CMP auto level of service standard. [11] Strategies identified in the 2017 CMP for Santa Clara County, where local jurisdictions are responsible agencies, include:[12]

- Transportation Analysis Standards Element:
  - Monitor and submit report on the level of service (LOS) on CMP roadway network intersections using CMP software and procedures.
  - Monitor performance of CMP rural highways and freeways.
- Multimodal Performance Measures Element: Collect available transportation measurement data for use in land use analysis, deficiency plans, and the Capital Improvement Program.

[11] Santa Clara Valley Transportation Authority, 2017, 2017 Congestion Management Program Document, http://vtaorgcontent.s3-us-west-1.amazonaws.com/Site_Content/2017_CMP_Document.pdf, accessed November 12, 2018.

[12] Santa Clara Valley Transportation Authority, 2017, 2017 Congestion Management Program Document, http://vtaorgcontent.s3-us-west-1.amazonaws.com/Site_Content/2017_CMP_Document.pdf, accessed November 12, 2018.

- Transportation Model and Database:
  - Certify that the CMP model us consistent with the regional model.
  - Certify that member agency models are consistent with the CMP model.
- Land Use Impact Analysis Element:
  - 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.
  - Submit relevant conditions of approval to VTA for projects generating TIAs.
  - Prepare quarterly report on VTA comments and local agency adopted conditions for VTA Board, Congestion Management Program and Planning Committee, Policy Advisory Committee, Technical Advisory Committee, Citizens Advisory Committee, and Bicycle and Pedestrian Advisory Committee.
  - 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.
- 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.
- 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.
- Multimodal Improvement Plan Element:
  - 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.
  - Submit a deficiency plan implementation status report as part of annual monitoring.

Bay Area Commuter Benefits Program

Under Air District Regulation 14, Model Source Emissions Reduction Measures, Rule 1, Bay Area Commuter Benefits Program, employers with 50 or more full-time employees within the Air District are required to register and offer commuter benefits to employees. In partnership with the Air District and the MTC, the rule's purpose is to improve air quality, reduce GHG emissions, and decrease the Bay Area's traffic congestion by encouraging employees to use alternative commute modes, such as transit, vanpool, carpool, bicycling, and walking. The benefits program allows employees to choose from one of four commuter benefit options including a pre-tax benefit, employer-provided subsidy, employer-provided transit, and alternative commute benefit.

Local Regulations

The City of Campbell's General Plan was adopted on November 6, 2001, with the Land use and Transportation Element Update adopted August 19, 2014, and the Housing Element adopted on February 17, 2015. The Conservation and Natural Resources Element of the 2001 General Plan includes goals,

policies and strategies that address the City's historic resources, biological resources, water resources, waste management and recycling, noise and air quality. Through the policies in this element, Campbell seeks to make a positive contribution to regional conservation efforts and improve regional air quality. General Plan goals, policies, and strategies pertinent to air quality are outlined in Table 4.2-2.

TABLE 4.2-2 CITY OF CAMPBELL GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO AIR QUALITY

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Conservation and Natural Resource Element	
Goal CNR-11	Work toward improving air quality and meeting all federal and State ambient air quality standards.
Policy CNR-11.1	Air Quality Impacts: Reduce adverse air quality impacts of City operations
Strategy CNR-11.1a	Alternative Vehicles: Consider use of alternative fuel vehicles or electric vehicles for City use.
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.
Strategy CNR-11.2a	Vehicle Trip Reduction Measures: Consider requiring vehicle trip reduction measures for new development.
Strategy CNR-11.2b	Vehicle Pollution Reduction: Encourage improvements such as bus turnouts and synchronized traffic signals for new development to reduce excessive vehicle emissions caused by idling.
Strategy CNR-11.2d	Construction Dust Control: Require dust control measures, including those included in the Santa Clara Valley Non-point Pollution Control Program, during construction.
Strategy CNR-11.2e	Buffering or Mitigation Requirements: Require adequate buffering or other mitigation of all potential air pollutant sources, including commercial and industrial emissions.
Policy CNR-11.3	Air Quality Improvement Programs: Support regional, State and federal programs to improve air quality.
Strategy CNR-11.3a	BAAQMD: Assist the BAAQMD in its efforts to achieve compliance with existing air quality regulations.
Strategy CNR-11.3b	Environmental Documents: Assess the adequacy of environmental documents for projects proposed in the City utilizing the thresholds established in the BAAQMD guidelines.

Source: City of Campbell, 2001, General Plan.

4.2.1.3 EXISTING CONDITIONS

San Francisco Bay Area Air Basin

Air quality in the San Francisco Bay Area Air Basin (SFBAAB) is determined by such natural factors as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions.[13] The discussion below identifies the natural factors in the SFBAAB that affect air pollution.

[13] Bay Area Air Quality Management District, 2017, Revised California Environmental Quality Act Air Quality Guidelines.

Meteorology

The SFBAAB is characterized by complex terrain, consisting of coastal mountain ranges, inland valleys, and bays, which distort normal wind flow patterns. The Coast Range[14] 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. 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 off to the northwest toward Richmond and to the southwest toward San José when it meets the East Bay hills. 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.

The air flowing in from the coast to the Central Valley, called the sea breeze, begins developing at or near ground level along the coast in late morning or early afternoon and the sea breeze deepens and increases in velocity while spreading inland. Under normal atmospheric conditions, the air in the lower atmosphere is warmer than the air above it. In the winter, the SFBAAB 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 air-flow patterns; air moves from the Central Valley toward the coast and back down toward the Bay from the smaller valleys within the SFBAAB.

Temperature

Summertime temperatures in the SFBAAB are determined in large part by the effect of differential heating between land and water surfaces. 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

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

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 SFBAAB 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 SFBAAB 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 are dispersed more readily into the atmosphere rather than accumulate under stagnant conditions). However, during the winter, frequent dry periods do occur, where 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 and 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 unhealthful levels.

Inversions

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 in the atmosphere available for diluting air contaminants near the ground). There are two types of inversions that occur regularly in the SFBAAB. Elevation inversions[15] are more common in the summer and fall, and radiation inversions[16] are more common during the winter. The highest air pollutant concentrations in the SFBAAB generally occur during inversions.

Attainment Status of the SFBAAB

The air quality management plans provide the framework for air quality basins to achieve attainment of the state and federal ambient air quality standards through the State Implementation Plan. Areas are classified as attainment or nonattainment areas for particular pollutants depending on whether they meet

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

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

the ambient air quality standards. Ozone nonattainment has a range of severity classifications: marginal, moderate, serious, severe, and extreme.

- **Unclassified.** A pollutant is designated unclassified if the data are incomplete and do not support a designation of attainment or nonattainment.
- **Attainment.** A pollutant is in attainment if the AAQS for that pollutant was not violated at any site in the area during a three-year period.
- **Nonattainment.** A pollutant is in nonattainment if there was at least one violation of an AAQS for that pollutant in the area.
- **Nonattainment/Transitional.** A subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

The attainment status for the SFBAAB is shown in Table 4.2-3. 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.

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

Pollutant	State	Federal
Ozone – 1-hour	Nonattainment	No Federal Standard
Ozone – 8-hour	Nonattainment (serious)	Nonattainment (marginal)
PM_{10}	Nonattainment	Unclassified
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Attainment
NO_2	Attainment	Unclassified/Attainment
SO_2	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	Attainment	No Federal Standard
All others	Unclassified/Attainment	Unclassified/Attainment

Note: On January 9, 2013, EPA issued a final rule to determine that the SFBAAB attains the 24-hour $PM_{2.5}$ national standard. This EPA rule suspends key State Implementation Plan requirements as long as monitoring data continues to show that the SFBAAB attains the standard. Despite this EPA action, the SFBAAB will continue to be designated as nonattainment for the national 24-hour $PM_{2.5}$ standard until such time as the Air District submits a redesignation request and a "maintenance plan" to EPA, and EPA approves the proposed redesignation.
Source: California Air Resources Board, 2017, Area Designations: Activities and Maps, http://www.arb.ca.gov/desig/adm/adm.htm, accessed July 31, 2018; Bay Area Air Quality Management District, 2017, Air Quality Standards and Attainment Status, http://www.baaqmd.gov/research-and-data/air-quality-standards-and-attainment-status, accessed July 31, 2018.

Existing Ambient Air Quality

Existing levels of ambient air quality and historical trends and projections in the vicinity of the project site in Campbell have been documented by measurements made by the Air District. The station nearest to the project site is the Los Gatos Monitoring Station at 306 University Avenue, which provides data for O_3. Data was not available for CO, NO_2, PM_{10}, or $PM_{2.5}$ from the Los Gatos station, so data from the next nearest

station, San José—Jackson Street Monitoring Station, was used. Data from these stations are summarized in Table 4.2-4. The data show occasional violations of the State and federal O_3 standards. The federal $PM_{2.5}$ and State PM_{10} standards have been exceeded twice in the last five years. The State and federal CO and NO_2 standards have not been exceeded in the last five years in the vicinity of the city.

TABLE 4.2-4 AMBIENT AIR QUALITY MONITORING SUMMARY

	Number of Days Threshold Were Exceeded and Maximum Levels During Such Violations				
Pollutant/Standard	2013	2014	2015	2016	2017
Ozone (O_3)[a]					
State 1-Hour ≥ 0.09 ppm	0	0	1	0	0
State 8-hour ≥ 0.07 ppm	1	2	4	0	3
Federal 8-Hour > 0.075 ppm	0	1	2	0	0
Maximum 1-Hour Conc. (ppm)	0.87	0.086	0.100	0.091	0.093
Maximum 8-Hour Conc. (ppm)	0.075	0.077	0.081	0.062	0.075
Nitrogen Dioxide (NO_2)[b]					
State 1-Hour ≥ 0.18 (ppm)	0	0	0	0	0
Maximum 1-Hour Conc. (ppb)	41.9	58.4	49.3	51.1	67.5
Coarse Particulates (PM_{10}) [b]					
State 24-Hour > 50 µg/m^3	0	1	1	1	6
Federal 24-Hour > 150 µg/m^3	0	0	0	0	0
Maximum 24-Hour Conc. (µg/ m^3)	33.5	54.7	58.0	40.0	69.8
Fine Particulates ($PM_{2.5}$)[b]					
Federal 24-Hour > 35 µg/m^3	*	2	2	0	6
Maximum 24-Hour Conc. (µg/m^3)	38.9	60.4	49.4	22.6	49.7

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 for NO_2, PM_{10}, and $PM_{2.5}$ from the San José Jackson Street Monitoring Station.
Source: California Air Resources Board, 2018, Air Pollution Data Monitoring Cards (2013, 2014, 2015, 2016, and 2017), http://www.arb.ca.gov/adam/index.html, accessed August 28, 2018.

Existing Emissions

The project site is currently developed with an office building and parking lot that generate long-term air pollutant emissions from the burning of fossil fuels in cars (mobile sources); energy used for cooling, heating, and cooking (energy); and landscape equipment use (area sources). Existing emissions are shown in Table 4.2-5.

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 land uses include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise

TABLE 4.2-5 EXISTING CRITERIA AIR POLLUTANTS EMISSIONS

	Criteria Air Pollutants (average lbs/day)			
Category	ROG	NO_x	PM_{10}	$PM_{2.5}$
Area	2	<1	<1	<1
Energy	<1	<1	<1	<1
On-Road Mobile Sources	<1	1	1	<1
Total	2	1	1	<1
	Criteria Air Pollutants (tons/year)			
Category	ROG	NO_x	PM_{10}	$PM_{2.5}$
Existing Tons per Year (tpy)	<1	<1	<1	<1

Notes: typ = tons per year; emissions may not total to 100 percent due to rounding.
a. Existing buildings were constructed prior to the 2005 Building and Energy Efficiency Standards; and therefore, the "historic" rate in CalEEMod was used to estimate existing building energy use.
Source: CalEEMod 2016.3.2.

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 recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent, since 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 population.

The nearest off-site sensitive receptors proximate to the project site include the residents of the single-family homes on the opposite side of Los Gatos Creek to the south along Mozart Way, accessed via Oka Road and Mozart Avenue[17] in Los Gatos. Users of the Los Gatos Creek Trail are considered moderate sensitive receptors since users are near the project site for short periods of time and may be engaged in exercise activities requiring the need of high respiratory functions.

4.2.2 IMPACT DISCUSSION

4.2.2.1 THRESHOLDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as

[17] Mozart Avenue (east of Highway 17) is not directly connected to East Mozart Avenue (east of Highway 17 in Campbell).

the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in Section 4.2.2.2 uses the following standards of significance. The proposed project would result in a significant air quality impact if it would:

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.

The Air District's 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 Air District's Board of Directors adopted CEQA thresholds of significance and an update of the CEQA Guidelines. These thresholds are designed to establish the level at which the District believed air pollution emissions would cause significant environmental impacts under CEQA.

In May 2011, the updated Air District's 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; however, this later amendment regarding risk and hazards was the subject of the December 17, 2015, California Supreme Court decision in *California Building Industry Association v BAAQMD*,[18] which clarified that CEQA does not require an evaluation of impacts of the environment on a project. The Supreme Court also found, however, that CEQA requires an analysis of exposing people to environmental hazards in specific circumstances, including the location of development near airports, the location of schools near sources of toxic contamination, and certain exemptions for infill and workforce housing and of a project's potentially significant exacerbating effects on existing environmental hazards. The Supreme Court also held that public agencies remain free to conduct this analysis regardless of whether it is required by CEQA. To account for these updates, the Air District published a new version of the Guidelines, dated May 2017, that includes revisions made to address the Supreme Court's opinion. The analysis in this EIR uses this latest version of the Air District's CEQA Guidelines.

[18] California Building Industry Association v. Bay Area Air Quality Management District 62 Cal. 4th 369 (No. S 213478).

Criteria Air Pollutant Emissions and Precursors

Regional Significance Criteria

The Air District's criteria for regional significance for projects that exceed the screening thresholds are shown in Table 4.2-6. Criteria for both the construction and operational phases of the project are shown.

TABLE 4.2-6 AIR DISTRICT REGIONAL (MASS EMISSIONS) CRITERIA AIR POLLUTANT SIGNIFICANCE THRESHOLDS

	Construction Phase	Operational Phase	
Pollutant	Average Daily Emissions (lbs/day)	Average Daily Emissions (lbs/day)	Maximum Annual Emissions (Tons/year)
ROG	54	54	10
NO_x	54	54	10
PM_{10}	82 (Exhaust)	82	15
$PM_{2.5}$	54 (Exhaust)	54	10
PM_{10} and $PM_{2.5}$ Fugitive Dust	Implement BMPs[a]	None	None

Notes: BMPs = best management practices
a. Implementation of the Air District construction best management practices is considered to result in construction-related fugitive dust emissions that are acceptable.
Source: Bay Area Air Quality Management District, 2017, Revised California Environmental Quality Act Air Quality Guidelines.

Fugitive Dust Significance Criteria

The Air District's criteria for regional significance for projects that exceed the screening thresholds are shown above in Table 4.2-5. Criteria for both the construction and operational phases of the project are shown. Implementation of the Air District construction best management practices is considered to result in construction-related fugitive dust emissions that are acceptable.

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). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology, the SFBAAB is in attainment of the California and National AAQS, and CO concentrations in the SFBAAB have steadily declined. Because CO concentrations have improved, the Air District does not require a CO hotspot analysis 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).

Community Risk and Hazards

The Air District's significance thresholds for local community risk and hazard impacts apply to both the siting of a new source and to 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. The proposed project would generate TACs and $PM_{2.5}$ during construction activities that could elevate concentrations of air pollutants at the nearby residential sensitive receptors. The thresholds for construction-related local community risk and hazard impacts are the same as for project operations. The Air District has adopted screening tables for air toxics evaluation during construction.[19] Construction-related TAC and $PM_{2.5}$ impacts should be addressed on a case-by-case basis, taking into consideration the specific construction-related characteristics of each project and proximity to off-site receptors, as applicable.[20]

Since neither the City of Campbell nor Santa Clara County currently has a qualified risk reduction plan, a site-specific analysis of TACs and $PM_{2.5}$ impacts on sensitive receptors was conducted. The thresholds identified below are applied to the project's construction and operational phases.

Community Risk and Hazards: Project

Project-level emissions of TACs or $PM_{2.5}$ from individual sources that exceed any of the thresholds listed below are considered a potentially significant community health risk:

- An excess cancer risk level of more than 10 in one million, or a noncancer (i.e., chronic or acute) hazard index greater than 1.0 would be a significant project contribution.
- An incremental increase of greater than 0.3 micrograms per cubic meter ($\mu g/m^3$) annual average $PM_{2.5}$ from a single source would be a significant project contribution. [21]

Community Risk and Hazards: Cumulative

Cumulative sources represent the combined total risk values of each of the individual sources within the 1,000-foot evaluation zone. A project would have a cumulative considerable impact if the aggregate total of all past, present, and foreseeable future sources within a 1,000-foot radius from the fence line of a source or location of a receptor, plus the contribution from the project, exceeds any of the following:

- An excess cancer risk level of more than 100 in 1 million or a chronic noncancer hazard index (from all local sources) greater than 10.0.
- 0.8 µg/m3 annual average $PM_{2.5}$.[22]

[19] Bay Area Air Quality Management District, 2010, Screening Tables for Air Toxics Evaluations during Construction.
[20] Bay Area Air Quality Management District, 2017, Revised California Environmental Quality Act Air Quality Guidelines.
[21] Bay Area Air Quality Management District, 2017, Revised California Environmental Quality Act Air Quality Guidelines.

In February 2015, the Office of Environmental Health Hazard Assessment (OEHHA) adopted new health risk assessment guidance that includes several efforts to be more protective of children's health. These updated procedures include the use of age sensitivity factors to account for the higher sensitivity of infants and young children to cancer causing chemicals, and age-specific breathing rate.[23]

4.2.2.2 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance as identified in Section 4.2.2.1 above. This air quality evaluation was prepared in accordance with the requirements of CEQA to determine if there are significant air quality impacts of the proposed project. Construction-related criteria air pollutants emissions associated with the proposed project were calculated using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2. Construction emissions associated with the proposed project are based on the construction schedule provided by the project applicant. Air quality modeling datasheets are in Appendix B of this Draft EIR. An HRA was conducted in March 2019 for the proposed project using Lakes Environmental AERMOD View (AERMOD air dispersion model) (see Appendix C, Health Risk Assessment) of this Draft EIR).

AQ-1 The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.

The Air District is directly responsible for reducing emissions from area, stationary, and mobile sources in the SFBAAB to achieve National and California AAQS. The Air District's 2017 Clean Air Plan is a regional and multiagency effort to reduce air pollution in the SFBAAB. A consistency determination with the air quality management plan plays an important role in local agency project review by linking local planning and individual projects to the 2017 Clean Air Plan. It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration early enough to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to the clean air goals in the 2017 Clean Air Plan.

The regional emissions inventory for the SFBAAB is compiled by the Air District. Regional population, housing, and employment projections developed by ABAG are based, in part, on cities' general plan land use designations. These projections form the foundation for the emissions inventory of the 2017 Clean Air Plan. These demographic trends are incorporated into Plan Bay Area, compiled by ABAG and the MTC to determine priority transportation projects and vehicle miles traveled in the Bay Area. The 2017 Clean Air Plan strategy is based on projections from local general plans. Projects that are consistent with the local general plan are considered consistent with the air quality-related regional plan. Large projects that exceed regional employment, population, and housing planning projections have the potential to be inconsistent with the regional inventory compiled as part of the 2017 Clean Air Plan.

[22] Bay Area Air Quality Management District, 2017, Revised California Environmental Quality Act Air Quality Guidelines.

[23] Office of Environmental Health Hazard Assessment, 2015, Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments.

As identified in impact discussion POP-1 in Chapter 4.11, Population and Housing, of this Draft EIR, the proposed project would not substantially affect housing, employment, or population projections within the region, which are the basis of the 2017 Clean Air Plan projections. Additionally, under CEQA Guidelines Section 15206,[24] the proposed project is not considered a regionally significant project that would affect regional vehicle miles traveled and warrant intergovernmental review by ABAG and MTC. Lastly, the net increase in regional emissions generated by the proposed project would not exceed the Air District's emissions thresholds (see impact discussion AQ-2 below). These thresholds are established to identify projects that have the potential to generate a substantial amount of criteria air pollutants. Because the proposed project would not exceed these thresholds, the proposed project would not be considered by the Air District to be a substantial emitter of criteria air pollutants. Therefore, the proposed project would not conflict with or obstruct implementation of the 2017 Clean Air Plan, and impacts would be considered *less than significant*.

Significance without Mitigation: Less than significant.

AQ-2	**The proposed project would generate short- and long-term criteria air pollutant emissions that could violate air quality standards or contribute substantially to an existing or projected air quality violation.**

The Air District 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 these significant thresholds (listed in Table 4.2-5) 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.

Construction Emissions

Construction activities produce combustion emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling materials to and from the site, and motor vehicles transporting the construction crew. Site preparation activities produce fugitive dust emissions (PM_{10} and $PM_{2.5}$) from demolition and soil-disturbing activities, such as grading and excavation. Air pollutant emissions from construction activities on-site would vary daily as construction activity levels change. Construction activities associated with the proposed project would result in emissions of ROG, NOx, CO, PM_{10}, and $PM_{2.5}$.

Construction Exhaust Emissions

Construction emissions are based on the preliminary construction schedule developed for the proposed project. The proposed project site would be developed in one phase. Activities that would take place are demolition, hauling, site preparation, grading, building construction, paving, and architectural coating. Construction activities were modeled to begin in January 2020 and continue to November 2021. To

[24] Pursuant to CEQA Guidelines Section 15206, a proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space would be considered a project of statewide, regional, or areawide significance.

determine potential construction-related air quality impacts, criteria air pollutants generated by project-related construction activities are compared to the Air District's significance thresholds. Average daily emissions are based on the annual construction emissions divided by the total number of active construction days. As shown in Table 4.2-7, criteria air pollutant emissions from construction equipment exhaust would not exceed the Air District's average daily thresholds. Therefore, construction-related criteria pollutant emissions from exhaust would be *less than significant*.

Significance without Mitigation: Less than significant.

TABLE 4.2-7 CONSTRUCTION-RELATED CRITERIA AIR POLLUTANT EMISSIONS ESTIMATES

	Criteria Air Pollutants (Tons/Year)[a]					
Year	ROG	NO_x	Fugitive PM_{10}[b]	Exhaust PM_{10}	Fugitive $PM_{2.5}$[b]	Exhaust $PM_{2.5}$
2020 Construction	<1	2	<1	<1	<1	<1
2021 Construction	1	1	<1	<1	<1	<1
	Criteria Air Pollutants (Average lbs/day)[a]					
	ROG	NO_x	Fugitive PM_{10}[b]	Exhaust PM_{10}	Fugitive $PM_{2.5}$[b]	Exhaust $PM_{2.5}$
Average Daily Construction Emissions at all Construction Phases[c]	5	16	1	1	<1	1
Air District Average Daily Project-Level Threshold	54	54	Implement BMPs	82	Implement BMPs	54
Exceeds Average Daily Threshold	**No**	**No**	**NA**	**No**	**NA**	**No**

Notes: BMP = Best Management Practices; NA = not applicable; emissions may not total to 100 percent due to rounding; Shading represents the fugitive dust component of the emissions that are mitigated through the Air District's BMPs.
a. Construction phasing is based on the preliminary information provided by the project applicant. Where specific information regarding project-related construction activities was not available, 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.
b. Includes implementation of best management practices for fugitive dust control required by the Bay Area Air Quality Management District. Implementation of the Air District construction best management practices is considered to result in construction-related fugitive dust emissions that are acceptable. See Mitigation Measure AQ-2.
c. Average daily emissions are based on the construction emissions divided by the total number of active construction days. The total number of construction days is estimated to be 372 days.
Source: CalEEMod 2016.3.2.

Fugitive Dust

Ground-disturbing activities during project construction could generate fugitive dust (PM_{10} and $PM_{2.5}$) that, if left uncontrolled, could expose the areas downwind of the construction site to air pollution from the construction dust. Fugitive PM_{10} is typically the most significant source of air pollution from the dust generated from construction. The amount of fugitive dust generated during construction would be highly variable and is dependent on the amount of material being demolished, the type of material, moisture content, and meteorological conditions. As described under Section 4.2.2, Thresholds of Significance, the Air District does not provide a quantitative threshold for construction-related fugitive dust emissions, and a project's fugitive dust emissions are considered to be acceptable with implementation of the Air District's best management practices. In other words, there could be a significant impact if the best

management practices are not enforced. For this reason, the project's fugitive dust emissions with the incorporation of the Air District's best management practices are quantified for reference in Table 4.2-7.

As described in Section 4.2.1.1, extended exposure to particulate matter can increase the risk of chronic respiratory disease, which would be a *significant* impact. PM_{10} bypasses the body's natural filtration system more easily than larger particles and can lodge deep in the lungs. $PM_{2.5}$ penetrates even more deeply into the lungs, and this is more likely to contribute to health effects—at concentrations well below current PM_{10} standards. 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).

Significance without Mitigation: Significant.

Impact AQ-2: Uncontrolled fugitive dust (PM_{10} and $PM_{2.5}$) could expose the areas that are downwind of construction sites to air pollution from construction activities without the implementation of the Air District's best management practices.

Mitigation Measure AQ-2: The project contractor shall comply with the following the Bay Area Air Quality Management District's best management practices for reducing construction emissions of uncontrolled fugitive dust (coarse inhalable particulate matter [PM_{10}] and fine inhalable particulate matter [$PM_{2.5}$]):

- Water all active construction areas at least twice daily or as often as needed to control dust emissions. Watering shall 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 shall 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.
- Hydro-seed or apply non-toxic soil stabilizers to inactive construction areas.
- Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (e.g., dirt, sand).
- Limit vehicle traffic speeds on unpaved roads to 15 miles per hour.
- Replant vegetation in disturbed areas as quickly as possible.

- Install sandbags or other erosion control measures to prevent silt runoff from public roadways.

The City of Campbell Building Division official or his/her designee shall verify compliance that these measures have been implemented during normal construction site inspections.

Significance with Mitigation: Less than significant. Mitigation Measure AQ-2 would ensure that the construction contractor complies with the Air District's best management practices to reduce fugitive dust to less than significant levels.

Operational Emissions

The project site is developed with an office building, which is partially occupied. The existing office building generates criteria air pollutant emissions associated with the burning of fossil fuels in cars and trucks (mobile sources) from employees; energy use for cooling and heating (energy); and area sources (e.g., landscape equipment and aerosol use). The proposed project would result in an increase in development intensity at the project site and an increase in emissions from these sectors. The primary source of long-term criteria air pollutant emissions generated by the proposed project would be emissions from project-generated vehicle trips. The proposed project would generate a net increase of 1,693 average daily weekday trips, 330 trips on Saturday, and 238 trips on Sunday. However, the proposed project would also replace the older building with a newer building that is constructed to meet the latest California Building and Energy Efficiency Standards. Table 4.2-8 identifies the net increase in criteria air pollutant emissions associated with the proposed project compared to the existing operation.

As shown in Table 4.2-8, the net increase in operational emissions generated by the project would not exceed the Air District's daily or annual thresholds. Consequently, the proposed project would not cumulatively contribute to the nonattainment designations of the SFBAAB, and regional operational phase air quality impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

AQ-3	**The proposed project could violate an air quality standard, contribute substantially to an existing or projected air quality violation, and could result in a cumulatively considerable net increase of criteria pollutants 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 project 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 $PM_{2.5}$,

TABLE 4.2-8 CRITERIA AIR POLLUTANTS EMISSIONS FORECAST

Category	Criteria Air Pollutants (Average lbs/day)[a]			
	ROG	NOx	PM_{10}	$PM_{2.5}$
Net Change (Average lbs/day)				
Existing (2022)				
Area	2	< 1	< 1	< 1
Energy[b]	< 1	< 1	< 1	< 1
On-Road Mobile Sources	< 1	< 1	1	< 1
Total	*2*	*1*	*1*	*< 1*
Proposed Project (2022) (Average lbs/day)				
Area	4	< 1	< 1	< 1
Energy[b]	< 1	1	< 1	< 1
On-Road Mobile Sources	2	3	7	2
Total	*6*	*4*	*7*	*2*
Net Change (Average lbs/day)				
Area	2	< 1	< 1	< 1
Energy[b]	< 1	< 1	< 1	< 1
On-Road Mobile Sources	1	2	6	2
Total	*3*	*3*	*6*	*2*
Air District Average Daily Project-Level Threshold	54	54	82	54
Exceeds Average Daily Threshold?	**No**	**No**	**No**	**No**
Net Change (Annual Emissions in TPY)				

Category	Criteria Air Pollutants (tpy)			
	ROG	NOx	PM_{10}	$PM_{2.5}$
Net Change	1	<1	1	<1
Air District Annual Project-Level Threshold	10 tpy	10 tpy	15 tpy	10 tpy
Exceeds Annual Threshold	**No**	**No**	**No**	**No**

Notes: tpy = tons per year; emissions may not total to 100 percent due to rounding.
a. Average daily emissions are based on the annual operational emissions divided by 365 days.
b. New buildings would be constructed to the 2016 Building Energy Efficiency Standards (effective January 1, 2017) at minimum. Existing buildings were constructed prior to the 2005 Building and Energy Efficiency Standards; and therefore, the "historic" rate in CalEEMod was used to estimate existing building energy use.
Source: CalEEMod 2016.3.2 Based on year 2022 emission rates.

and California PM_{10} AAQS.[25] Any project that produces a significant project-level regional air quality impact in an area that is in nonattainment adds to the cumulative impact.

The proposed project's contribution to cumulative air quality impacts is identified under impact discussions AQ-1, AQ-2, and AQ-4, which analyze whether the proposed project would conflict with the 2017 Clean Air Plan (impact discussion AQ-1), generate a substantial increase in criteria air pollutants (impact discussion AQ-2 and Impact AQ-2), or result in cumulative health risk (impact discussion AQ-4 and Impact AQ-4).

- As described under impact discussion AQ-1, the proposed project would be consistent with the 2017 Clean Air Plan.
- As described in impact discussion AQ-2, the proposed project would not have a significant long-term operational phase impact, and emissions of ROG, O_3, $PM_{2.5}$, and PM_{10}, would be below the Air District's regional standards of significance.
- Impact discussion AQ-2 also describes construction exhaust emissions, and demonstrates that emissions of ROG, O_3, $PM_{2.5}$, and PM_{10}, would not exceed the Air District's thresholds with the implementation of Mitigation Measure AQ-2, which requires the Air District's construction best management practices for fugitive dust.
- As described in impact discussion AQ-4, the proposed project would not have a significant long-term operational phase impact, and emissions of $PM_{2.5}$, TACs, and CO would be below the Air District's standards of significance. Impact discussion AQ-4 also describes construction emissions, and demonstrates that emissions of construction exhaust $PM_{2.5}$ and TACs would not exceed the Air District's thresholds with the implementation of Mitigation Measure AQ-4, which requires Level 2 Diesel Particulate Filters for all equipment of 50 horsepower or more.

Accordingly, , the proposed project's cumulative contribution to the nonattainment designations of the SFBAAB and health risk in the Bay Area would be *significant* without implementation of Mitigation Measure AQ-2 and AQ-4.

Impact AQ-3: Construction of the proposed project would cumulatively contribute to the non-attainment designations of the SFBAAB and health risk in the Bay Area.

Mitigation Measure AQ-3: Implement Mitigation Measures AQ-2 and AQ-4.

Significance with Mitigation: Less than significant. Implementation of Mitigation Measures AQ-2 and AQ-4 would ensure that construction emissions would not exceed the Air District's significance thresholds. Therefore, after mitigation the project would not cumulatively contribute to the nonattainment or health risks of the SFBAAB.

[25] California Air Resources Board, 2017, Area Designations Maps: State and National, October 18, http://www.arb.ca.gov/desig/adm/adm.htm, accessed on January 21, 2018.

AQ-4 The proposed project could expose sensitive receptors to substantial pollutant concentrations.

The proposed project could expose sensitive receptors to elevated pollutant concentrations if it would cause or contribute significantly to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass, so they can be more readily correlated to potential health effects.

Construction

The proposed project would elevate concentrations of DPM and construction exhaust $PM_{2.5}$ in the vicinity of sensitive residential land uses (i.e., receptors) during construction activities. The nearest off-site sensitive receptors proximate to the project site include the single-family residences on the opposite side of Los Gatos Creek to the south along Mozart Way.[26] Construction activities would occur within 150 meters (492 feet) to these sensitive receptor locations. Consequently, an HRA of DPM and construction exhaust $PM_{2.5}$ was prepared for the proposed project and is included in Appendix C, Health Risk Assessment, of this Draft EIR.

Sources evaluated in the HRA include off-road construction equipment and heavy-duty diesel trucks along the truck route, based on the 17-month construction duration and an off-road equipment list provided by the project applicant. The EPA's AERMOD air dispersion modeling program and the latest HRA guidance from the OEHHA were used to estimate excess lifetime cancer risks, chronic non-cancer hazard indices, and the $PM_{2.5}$ maximum annual concentrations at the nearest sensitive receptors. Results of the analysis are shown in Table 4.2-9.

TABLE 4.2-9 CONSTRUCTION HEALTH RISK ASSESSMENT RESULTS – UNMITIGATED

	Project Level Risk		
Receptor	Cancer Risk (Per Million)	Chronic Hazards	Construction Exhaust $PM_{2.5}$ ($\mu g/m^3$)
Maximum Exposed Receptor	12.3	0.031	0.08
Threshold	10	1.0	0.3 $\mu g/m^3$
Exceeds Threshold	**Yes**	**No**	**No**

Notes: Cancer risk calculated using 2015 Office of Environmental Health Hazard Assessment HRA guidance.

The results of the HRA are based on the maximum sensitive receptor concentration over a 17-month construction exposure period for off-site receptors. Using the updated OEHHA guidance, the HRA identifies the following risks:

- Cancer risk for the maximum exposed receptor (MER) from project-related construction emissions was calculated to be 12.3 in a million, which would exceed the 10 in a million significance threshold.

[26] Mozart Avenue is accessed via Oka Road in Los Gatos and is not directly connected to East Mozart Avenue in Campbell.

In accordance with the latest 2015 OEHHA guidance, the calculated total cancer risk conservatively assumes that the risk for the MER consists of a pregnant woman in the third trimester that subsequently gives birth to an infant during the approximately 17-month construction period; therefore, all calculated risk values were multiplied by a factor of 10. In addition, it was conservatively assumed that the residents were outdoors eight hours a day, 260 construction days per year and exposed to all of the daily construction emissions.

- For non-carcinogenic effects, the chronic hazard index identified for each toxicological endpoint totaled less than 1 for all the off-site sensitive receptors. Therefore, chronic non-carcinogenic hazards are within acceptable limits.
- The highest $PM_{2.5}$ annual concentration of 0.08 is below the Air District's significance threshold of 0.3 micrograms per cubic meter ($\mu g/m^3$).

Consequently, prior to mitigation, cancer risk impacts would be *significant* because the proposed project would expose sensitive receptors to substantial concentrations of air pollutant emissions during construction.

Significance without Mitigation: Significant.

Impact AQ-4: Construction activities of the project could expose nearby residential receptors to cancer risk that would exceed the Air District's significance thresholds.

Mitigation Measure AQ-4: The project applicant shall specify in the construction bid that the construction contractor(s) shall use construction equipment with fitted with Level 2 Diesel Particulate Filters (DPF) or higher emissions standards for all equipment of 50 horsepower or more. Level 2 DPFs are capable of reducing 50 percent of diesel exhaust and particulate emissions from off-road equipment.

- Prior to construction, the construction contractor(s) shall ensure that all construction plans submitted to the City of Campbell Building Division, or its designee, clearly show the requirement for Level 2 DPF or higher emissions standards for construction equipment over 50 horsepower.
- During construction, the construction contractor(s) shall maintain a list of all operating equipment in use on the project site for verification by the City of Campbell Building Division or its designee. The construction equipment list shall state the makes, models, and number of construction equipment on-site.
- Equipment shall be properly serviced and maintained in accordance with manufacturer recommendations.
- The construction contractor shall ensure that all non-essential idling of construction equipment is restricted to five minutes or less, in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.

Significance with Mitigation: Less than significant. Mitigation Measure AQ-4 would reduce the project's localized construction emissions. The mitigated health risk values were calculated and are

summarized in Table 4.2-10. The results indicate that, with mitigation, health risks would be less than the Air District's significance thresholds for residential receptors. Therefore, the project would not expose off-site sensitive receptors to substantial concentrations of air pollutant emissions during construction and impacts would be less than significant with mitigation.

TABLE 4.2-10 CONSTRUCTION RISK SUMMARY – MITIGATED

Receptor	Cancer Risk (Per Million)	Chronic Hazards	$PM_{2.5}$ ($\mu g/m^3$)[a]
Maximum Exposed Receptor – Off-Site Residence	7.2	0.018	0.05
Air District Threshold	10	1.0	0.3
Exceeds Threshold?	**No**	**No**	**No**

Note: Cancer risk calculated using 2015 OEHHA HRA guidance.
Risks incorporate Mitigation Measure AQ-4, which includes using construction equipment with Level 2 Diesel Particulate Filters for equipment over 50 horsepower.

Operation

The proposed project would not create new major sources of TACs or $PM_{2.5}$ during the operational phase. Additionally, the proposed project is not considered a source of new sensitive receptors. Accordingly, the operational impacts of the project to nearby sensitive receptors would be *less than significant*.

Significance without Mitigation: Less than significant.

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 ambient air quality standards 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. The proposed project would generate an increase of 1,693 average daily trips, which 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. As a result, trips associated with the proposed project would not exceed the screening criteria of the Air District. Localized air quality impacts related to mobile-source emissions would therefore be *less than significant*.

Significance without Mitigation: Less than significant.

AQ-5 The proposed project would not create or expose a substantial number of people to objectionable odors.

Construction and operation of the proposed project would not generate substantial odors or be subject to odors that would affect a substantial number of people. The type of facilities that are considered to have

objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. Office uses are not associated with foul odors that constitute a public nuisance. Therefore, *no impact* would occur, and no mitigation measures are required.

Significance without Mitigation: No impact.

4.2.3 CUMULATIVE IMPACTS

Impact AQ-3 analyzes potential cumulative impacts related to air quality that could occur from the buildout associated with the proposed project in combination with the regional growth in the air basin. As identified under Impact AQ-3, Mitigation Measure AQ-2 would reduce impacts from fugitive dust generated during construction activities while Mitigation Measure AQ-4 would reduce TAC impacts from operation of off-road construction equipment. With these mitigation measures, regional and localized construction emissions would not exceed the Air District's significance thresholds. Consequently, the proposed project would not cumulatively contribute to the nonattainment designations.

It is speculative to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment since mass emissions are not correlated with concentrations of emissions or how many additional individuals in the air basin would be affected by the health impacts mentioned. The Air District is the primary agency responsible for ensuring the health and welfare of sensitive individuals to elevated concentrations of air quality in the SFBAAB at the present time and it has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health. Because of the complexities of predicting emission concentrations in relation to the National AAQS and California AAQS, it is not possible to link health risks to the magnitude of emissions generated from a project exceeding the BAAQMD thresholds.

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4.3 BIOLOGICAL RESOURCES

This chapter describes the regulatory framework, existing conditions on the project site, and potential impacts of the project related to biological resources. During the scoping process for this EIR, members of the community expressed concern regarding potential indirect effects that the project could have on species in the adjacent creek corridor, such as impacts from lighting, and the potential for bird strikes on the taller office building. These potential issues are addressed below.

The information in this chapter is based partly on the Assessment of and Recommendations for 26 Protected-Size Trees at 1700 Dell Avenue Campbell, California completed by WLCA on January 17, 2018; a complete copy of this report is included as Appendix D to this DEIR.

4.3.1 ENVIRONMENTAL SETTING

4.3.1.1 REGULATORY FRAMEWORK

Federal Regulations

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).[1] 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, 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

[1] 16 United States Code Section 1531 *et seq.*

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 (CWA) is administered by the United States Environmental Protection Agency (EPA) and the United States 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 do support, a prevalence of vegetation typically adapted for life in saturated soil conditions."

The discharge of dredged or fill material into waters of the United States 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 (RWQCB) is also required when a proposed activity may result in discharge into navigable waters, pursuant to Section 401 of the CWA and the EPA 404(b)(1) Guidelines.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests.[2] Moreover, the MBTA prohibits the take, possession, import, exports, transport, selling, purchase, barter—or offering for sale, purchase or barter—any migratory bird or its eggs, parts, or nests, except as authorized under a valid permit.[3] The MBTA's prohibitions on take apply only to affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs, and do not apply to take that is incidental to, and not the purpose of, a lawful activity.[4]

[2] 16 United States Code 703 *et seq*.

[3] Code of Federal Regulations Title 50 Section 21.11.

[4] United States Department of the Interior, 2017, Memorandum, Subject: The Migratory Bird Treaty Act Does Not Prohibit Incidental Take, dated December 22, 2017, https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf, accessed on January 28, 2019.

State Regulations

California Endangered Species Act

The California Endangered Species Act (CESA) establishes State policy to conserve, protect, restore, and enhance threatened or endangered species and their habitats.[5] 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 CDFW, incorporating necessary mitigation, and obtaining a Streambed Alteration Agreement. CDFW's 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.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act authorizes the 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

[5] California Fish and Game Code Section 2050 *et seq.*

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.

Regional Regulations

Santa Clara Valley Habitat Plan

The Santa Clara Valley Habitat Plan (Habitat Plan) is a habitat conservation plan (HCP) and natural community conservation plan (NCCP) encompassing about 812 square miles, or approximately 62 percent of Santa Clara County, consisting mainly of the southern and central portions of the county and including much of the central, southern, and eastern parts of the metropolitan San José area (see Figure 4.3-1). The Habitat Plan was approved and adopted in 2013 and is administered by the Santa Clara Valley Habitat Agency.[6] The Habitat Plan was prepared by the following six agencies, referred to in the Habitat Plan as "local partners" or "permittees": Santa Clara County, City of San José, City of Morgan Hill, City of Gilroy, Santa Clara Valley Water District (SCVWD), and Santa Clara Valley Transportation Authority. The Habitat Plan identifies a "Study Area" and a "Permit Area." The Study Area is defined as the area in which all covered activities would occur, impacts would be evaluated, and conservation activities would be implemented. The boundary of the Study Area was based on political, ecological, and hydrologic factors. The Study Area includes all of the Llagas, Uvas, and Pajaro watersheds within Santa Clara County; all of the Coyote Creek watershed, except for the Baylands; a large portion of the Guadalupe watershed; and small areas outside these watersheds. The Habitat Plan also identifies an Expanded Study Area for Burrowing Owl Conservation. The Permit Area is the area in which the permittees are requesting take authorization from the USFWS and CDFW for covered activities. The Permit Area includes the Study Area and the Expanded Study Area for Burrowing Owl Conservation, but it is different from the Study Area because it excludes Henry W. Coe State Park and a small portion of Pacheco State Park. The Habitat Plan Permit Area includes Los Gatos Creek and the Los Gatos Creek Trail, which abuts the east side of the project site, but excludes the remainder of the City of Campbell, including the project site (Figure 4.3-1).

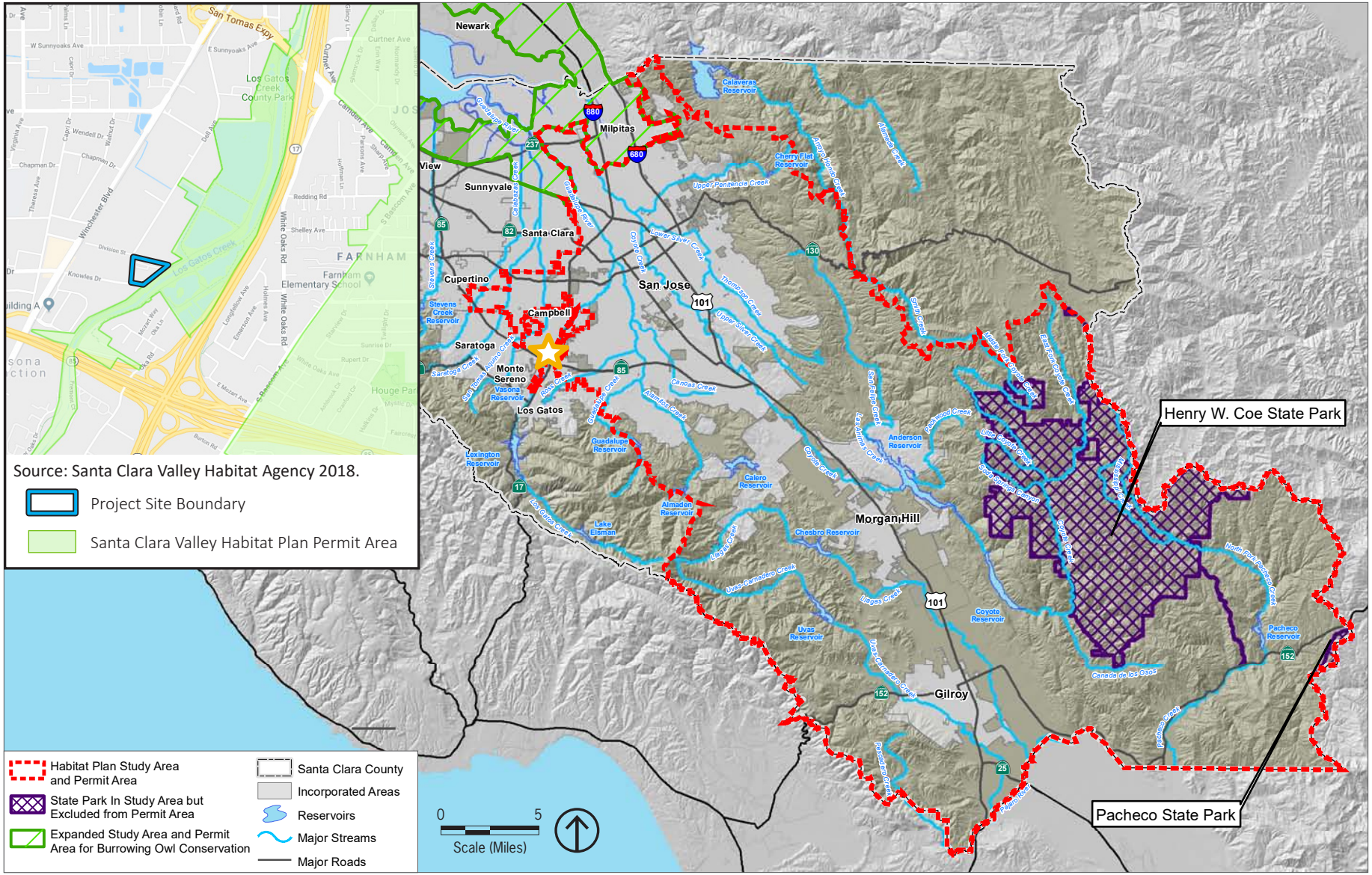
The Habitat Plan covers 18 species, listed in Table 4.3-1. The Habitat Plan includes creation of a Reserve System totaling about 46,900 acres; no reserves are near Campbell [7] The Habitat Plan Permit Area includes seven natural communities—grassland, chaparral and coastal scrub, oak woodland, riparian forest and scrub, conifer woodland, wetland, and open water—in addition to two categories of non-natural land cover—irrigated agriculture and developed.[8]

Habitat assessment surveys are required for several covered species in various portions of the Habitat Plan Permit Area, and preconstruction surveys to determine presence/absence are required where suitable habitat is found for affected species. Development projects must also pay development fees or

[6] The Habitat Plan was adopted by six co-permittees: Santa Clara County; the Santa Clara County Water District; the Santa Clara Valley Transportation Authority; and the cities of San Jose, Gilroy, and Morgan Hill.

[7] Santa Clara Valley Habitat Agency, 2012, Santa Clara Valley Habitat Plan, Chapter 1: Introduction, https://scv-habitatagency.org/DocumentCenter/View/123/Chapter-1-Introduction, accessed October 29, 2018.

[8] Santa Clara Valley Habitat Agency, 2012, Santa Clara Valley Habitat Plan, Chapter 3: Physical and Biological Resources, https://scv-habitatagency.org/DocumentCenter/View/125/Chapter-3-Physical-and-Biological-Resources, accessed October 29, 2018.



Source: Santa Clara Valley Habitat Agency 2012.

Approximate Project Site

Figure 4.3-1
Santa Clara Valley Habitat Plan Permit Area

TABLE 4.3-1 COVERED SPECIES, SANTA CLARA VALLEY HABITAT PLAN

Species: Common Name *Scientific Name*	Federal Status	State Status	CNPS Rare Plant Rank
ANIMALS			
Invertebrates			
Bay checkerspot butterfly *Euphydryas editha bayensis*	T	---	NA
Amphibians			
California tiger salamander *Ambystoma californiense*	T	T	NA
California red-legged frog *Rana draytonii*	T	CSC	---
Foothill yellow-legged frog *Rana boylii*	---	CSC	
Reptiles			
Western pond turtle *Clemmys marmorata*	---	CSC	
Birds			
Western burrowing owl *Athene cunicularia hypugea*	---	CSC	
Least Bell's vireo *Vireo bellii pusillus*	E	E	
Tricolored blackbird *Agelaius tricolor*	---	CSC	
Mammals			
San Joaquin kit fox *Vulpes macrotis mutica*	E	T	
PLANTS			
Tiburon Indian paintbrush *Castilleja affinis ssp. neglecta*	E	T	1B
Coyote ceanothus *Ceanothus ferrisiae*	E	---	1B
Mount Hamilton thistle *Cirsium fontinale var. campylon*	---	---	1B
Santa Clara Valley dudleya *Dudleya abramsii ssp. setchellii*	E	---	1B
Fragrant fritillary *Fritillaria liliacea*	---	---	1B
Loma Prieta hoita *Hoita strobilina*	---	---	1B
Smooth lessingia *Lessingia micradenia var. glabrata*	---	---	1B
Metcalf Canyon jewelflower *Streptanthus albidus ssp. albidus*	E	---	1B
Most beautiful jewelflower *Streptanthus albidus ssp. peramoenus*	---	---	1B

Status: Federal: E = Endangered, T = Threatened. State: E = Endangered, T = Threatened, CSC = California Species of Special Concern
California Native Plant Society (CNPS): 1B: Rare, Threatened, or Endangered in California and Elsewhere

Source: Santa Clara Valley Habitat Agency, 2012, Santa Clara Valley Habitat Plan, Chapter 1: Introduction, https://scv-habitatagency.org/DocumentCenter/View/123/Chapter-1-Introduction, accessed October 29, 2018.

may dedicate land in lieu of fees. To minimize impacts on covered species, the Habitat Plan also requires buffers and landscaping restrictions, limits on project footprints and on areas of permitted ground disturbance, and limits on seasons when disturbances are permitted, in various portions of the Permit Area. The regional scope of the Habitat Plan enables avoidance and minimization efforts to be focused where they will have the greatest value.[9]

Santa Clara Valley Water District

The Santa Clara Valley Water District (SCVWD) is a water wholesaler providing imported water from the State Water Project and the Central Valley Project to retail water purveyors in the county. The SCVWD enacted a Water Resources Protection Ordinance in 2006 governing modifications, access, and use of District-managed water resources.

The SCVWD issued Guidelines and Standards for Land Use Near Streams: A Manual of Tools, Standards, and Procedures to Protect Streams and Streamside Resources in Santa Clara County in 2007. In 2002 the SCVWD and 15 cities and towns in the county established the Water Resources Protection Collaborative, which works to clarify and streamline local permitting for streamside activities in Santa Clara County.[10] The SCVWD owns the Los Gatos Creek Trail adjacent to the project site would be a responsible agency for the proposed project should any work occur within its title fee property. "Responsible agencies" are public agencies that carry out or approve a project for which a lead agency is conducting CEQA review; responsible agencies are all agencies other than the lead agency with discretionary approval power over the project. In the case of the proposed project, a permit from the SCVWD would be required for any work that occurs within the Los Gatos Creek trail corridor.

Local Regulations

City of Campbell Municipal Code Chapter 21.32, Tree Protection Regulations, protects trees on private properties. Trees on commercial, industrial, multi-family residential, mixed-use, and undeveloped single-family residential properties that have at least one trunk measuring 12 inches or more in diameter (38 inches circumference) measured at 4 feet above the adjacent grade are protected under Chapter 21.32. The Chapter provides other protections for trees on developed single-family residential properties; and for heritage trees designated by the City's Historic Preservation Board.

4.3.1.2 EXISTING CONDITIONS

On-Site Land Cover and Vegetation

The site is developed with a multi-tenant office building; several units in the building are vacant. Most of the balance of the site is surface parking. The largest landscaped areas on-site include a landscaped area

[9] Santa Clara Valley Habitat Agency, 2012, Santa Clara Valley Habitat Plan, Chapter 1: Introduction, https://scv-habitatagency.org/DocumentCenter/View/123/Chapter-1-Introduction, accessed October 29, 2018.

[10] Santa Clara County Water District, 2018, Water Resources Protection Collaborative, https://www.valleywater.org/contractors/doing-businesses-with-the-district/permits-for-working-on-district-land-or-easement/water-resources-protection-collaborative, accessed November 8, 2018.

next to the southeast side of most of the length of the existing building, a landscaped strip along the west side of the project site, and a landscaped area next to the west side of the northeast end of the building. There are numerous smaller landscaped areas next to the perimeter of the building, along the northern site boundary, and scattered across the parking lot. Vegetation in the landscaped area next to the building consists of turf, shrubs, and a few trees. Most of the site was in agricultural use from at least 1939 through the 1970s, when the existing building was built.[11]

Los Gatos Creek and Los Gatos Creek County Park

Los Gatos Creek, located to the east of the project site extends 24 miles northward from the Santa Cruz Mountains in the south to the Guadalupe River in central San José. The Guadalupe River continues north to the San Francisco Bay. Los Gatos Creek extends along the east side of the park and along most of the Los Gatos Creek Trail's length. The project site abuts the west side of the Los Gatos Creek Trail and the Los Gatos Creek.

The 950-foot segment of Los Gatos Creek adjacent to the project site is mapped as a stream on the National Wetlands Mapper and has earthen bed and banks. Two segments of Los Gatos Creek—one upstream of the project site and one downstream—are ponds impounded by small dams. A paved multi-use trail, the Los Gatos Creek Trail, extends along the west bank of the Creek and abuts the eastern project site boundary. A paved connector path alongside the northern project site boundary connects Dell Avenue to the bicycle trail.

The open creek corridor contains riparian vegetation along the creek banks, and the Los Gatos Creek Trail on an upper plateau. The width of the corridor ranges from about 30 feet wide next to the south end of the project site to about 120 feet wide next to the north end of the project site. The corridor is mapped as *Urban Parks* by the Santa Clara Valley Habitat Agency. Los Gatos Creek Trail passes through that area. Los Gatos Creek, including bed and banks and riparian habitat next to the banks, is on the east side of the Urban Park area, ranging in width from about 150 feet near the south end of the project site to 120 feet near the north end of the site, and is mapped as Willow Riparian Forest and Scrub. The area abutting the east side of Los Gatos Creek is mapped as pond (see Figure 4.3-2).[12]

Most of the creek corridor consists of excavated percolation ponds and is owned by the SCVWD. Water in Los Gatos Creek is diverted into the ponds for percolation into the groundwater basin, and the ponds are flooded intermittently during the rainy season.[13]

[11] Applied Water Resources, 2016, Phase I Environmental Site Assessment, 1680-1700 Dell Avenue, Campbell, California.

[12] Santa Clara Valley Habitat Agency, 2018, Santa Clara Valley Habitat Agency Geobrowser, http://www.hcpmaps.com/habitat/, accessed October 29, 2018.

[13] About 75 percent of the historical average rainfall in Los Gatos, which borders the south side of Campbell, falls during the four months December through March; see Western Regional Climate Center, Climate Summary: Los Gatos, California, https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca5123.

Source: Santa Clara Valley Habitat Authority, http://gisdata2-sccplanning.opendata.arcgis.com/.

Project Site Boundary

Figure 4.3-2
Land Cover Map, Los Gatos Creek and Los Gatos Creek Trail East of the Project Site

The four percolation ponds along the creek, which include Pond 3—the closest pond to the project site—are designated wildlife preserves by County Parks. Two of the ponds, in the north and central areas, are used for fishing, sailing, and model boating.[14] The ponds are listed as one of the important birding locations in Santa Clara County by Siliconvalleybirding.org, an affiliate of the Santa Clara County Audubon Society.[15]

Sensitive Resources

Sensitive Natural Communities

There are no sensitive natural communities on-site; the site is fully developed with a building, surface parking, and ornamental landscaping.

A search of the California Natural Diversity Database (CNDDB) in the nine quadrangles in the Campbell region did not yield documented occurrences of sensitive plant communities in Campbell. Two such communities were identified in the region: Northern Coastal salt marsh and serpentine bunchgrass.[16] The nearest serpentine bunchgrass grassland to the project site, as mapped by the Santa Clara Valley Habitat Agency, is about 5.1 miles to the northeast of the project site, in the City of San José.[17] No map of Northern Coastal salt marsh is available. Saline emergent wetland—that is, salt or brackish marsh with plants emerging out of the water—was thus used as a substitute for Northern Coastal salt marsh for a map search. The nearest saline emergent wetland to the site is on the southeast shore of San Francisco Bay in the City of Fremont about 17 miles to the northwest.[18,19]

Sensitive Animal Species that could Occur Incidentally Onsite

The project site could be used for incidental foraging by birds inhabiting Los Gatos Creek and Los Gatos Creek Trail. A CNDDB search was conducted for birds whose habitat preferences include riparian habitats in a nine-quadrangle region centered on Campbell.[20] CDFW range maps for each of the species were checked to verify that the City of Campbell is within the range of the species. Based on this search, the following bird species could occur within Los Gatos Creek and Los Gatos Creek Trail, and could therefore use the project site for incidental foraging:

[14] Santa Clara County Parks and Recreation Department, 2018, Los Gatos Creek County Park, Los Gatos Creek County Park Guide Map, https://www.sccgov.org/sites/parks/parkfinder/Documents/33456lgparkm.pdf, accessed October 29, 2018.

[15] South Bay Birds, 2018, Important Birding Locations in Santa Clara County, https://siliconvalleybirding.org/top-birding-locations-in-santa-clara-county/, accessed November 13, 2018.

[16] California Department of Fish and Wildlife, 2018, California Natural Diversity Database, https://map.dfg.ca.gov/rarefind/Login.aspx?ReturnUrl=%2frarefind%2fview%2fRareFind.aspx, accessed October 26, 2018.

[17] Santa Clara Valley Habitat Agency, 2018, Santa Clara Valley Habitat Agency Geobrowser.

[18] Conservation Biology Institute, 2018, Data Basin, California Wildlife Habitat Relationships, https://databasin.org/maps/new#datasets=b44e9a19ee954c00b5830836e6b8264c, accessed November 13, 2018.

[19] California Department of Fish and Wildlife, 2013, California Wildlife Habitat Relationships System, Saline Emergent Wetland, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=67392&inline, accessed November 13, 2018.

[20] The bird species included in this search prefer habitats including inland freshwater wetlands and exclude: species that are active primarily in water—such as egrets and great blue heron—as there are no water bodies on-site; species that inhabit saltwater wetlands specifically; and birds preferring seacoast habitats.

- Cooper's hawk (*Accipiter cooperii*)
- tricolored blackbird (*Agelaius tricolor*)
- western snowy plover (*Charadrius alexandrinus nivosus*)
- northern harrier (*Circus cyaneus*)
- white-tailed kite (*Elanus leucurus*)
- saltmarsh common yellowthroat (*Geothlypis trichas sinuosa*)
- California black rail (*Laterallus jamaicensis coturniculus*)
- black-crowned night heron (*Nycticorax nycticorax*)
- osprey (*Pandion haliaetus*)

There is no suitable habitat for these species on-site per CDFW's definition of "habitat," that is, where a given plant or animal species meets its requirements for food, cover, and water in both space and time.[21] Sensitive species are also not expected to inhabit the site due to periodic landscape maintenance activities such as mowing and trimming.

Tricolored blackbird is a covered species under the Habitat Plan; Los Gatos Creek and Los Gatos Creek County Trail, abutting the east side of the project site, is in a Habitat Plan Survey Area for tricolored blackbird.[22]

Aquatic or riparian terrestrial animals, such as amphibians, are not expected to occur on-site, as there are no water bodies and no riparian habitat on-site.

Bats are not expected to use the building as a roost, the building is currently occupied.

Wetlands and Riparian Habitats

Wetlands are defined under the federal CWA as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include playas, ponds, and wet meadows; lakes and reservoirs; rivers, streams, and canals; estuaries; and beaches and rocky shores.[23] The entire site is developed with an office building, surface parking, and landscaping, and there are no wetlands on-site.

Riparian habitats are those occurring along the banks of rivers and streams. No riparian habitats are present on-site.

[21] California Department of Fish and Wildlife, 2015, State Wildlife Action Plan: Chapter 11: Glossary, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=100054, accessed November 13, 2018.

[22] Santa Clara Valley Habitat Agency, 2012, Santa Clara Valley Habitat Plan, Chapter 1: Introduction, https://scv-habitatagency.org/DocumentCenter/View/123/Chapter-1-Introduction, accessed October 29, 2018.

[23] Southern California Wetlands Recovery Project, General Wetlands Information, https://scwrp.org/general-wetlands-information/, accessed October 29, 2018.

Los Gatos Creek, which passes close to the east site boundary, is mapped as Willow Riparian Forest and Scrub.[24]

Wildlife Movement

Los Gatos Creek and Los Gatos Creek Trail enable wildlife movement in the vicinity of the project site. However, there are no large areas of native habitat along Los Gatos Creek near the project site. The nearest large area of native habitat to the site along Los Gatos Creek is in and near the St. Joseph's Hill Open Space Preserve on the northeast foot of the Santa Cruz Mountains, about 4 miles south of the project site.

There is no large area of native habitat downstream along Los Gatos Creek, and the Guadalupe River into which it discharges, until the Guadalupe River reaches the south shore of San Francisco Bay about 15 miles (by stream) north of the project site. The intervening stretches of Los Gatos Creek and the Guadalupe River are in the urbanized San Jose region. Multiple dams on Los Gatos Creek limit the distribution of aquatic animals up and down the creek. Vasona Dam is about 1.1 miles south of the site, and Lexington Dam is about 4.6 miles south of the site. In addition, several smaller dams divert water from the creek, or impound segments of the creek into ponds, both for groundwater recharge. Therefore, Los Gatos Creek and Los Gatos Creek Trail are considered to have limited value as a regional wildlife movement corridor.

Los Gatos Creek, Los Gatos Creek Trail, and the project site are not in a potential landscape linkage mapped as part of the Santa Clara Valley Habitat Plan.[25]

Nesting Birds

Trees and shrubs on the project site could be used for nesting by birds protected under State laws.

4.3.2 IMPACT DISCUSSION

4.3.2.1 STANDARDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this

[24] Southern California Wetlands Recovery Project, General Wetlands Information, https://scwrp.org/general-wetlands-information/, accessed November 14, 2018.

[25] Santa Clara Valley Habitat Agency, 2012, Santa Clara Valley Habitat Plan, Chapter 3: Physical and Biological Resources.

consideration, the analysis in Section 4.3.2.2 uses the following standards of significance. The proposed project would result in a significant biological resource impact if it would:

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 U.S. Fish and Wildlife Service.
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.
3. Have a substantial 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.
7. In combination with past, present, and reasonably foreseeable projects, result in significant cumulative impacts with respect to biological resources.

4.3.2.2 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance as identified in Section 4.3.2.1 above.

BIO-1	**The proposed project would not 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 by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.**

Direct Impacts

Project development would involve clearance of vegetation on-site. Of 26 trees on-site protected by City of Campbell Tree Protection Regulations, eight (8) trees would be removed and 18 retained.[26] The trees to

[26] Walter Levison Consulting Arborist, 2019, Assessment of and Recommendations for 26 Protected-Size Trees at 1700 Dell Avenue Campbell, California, revised March 19, 2019.

be retained are along the north and west site boundary and on the south side of the east site boundary. Removal of the eight (8) protected trees planned for removal would require a tree removal permit.

There is no suitable habitat for sensitive species on-site per CDFW's definition of "habitat." The project site is also unsuitable for sensitive species due to frequent or periodic disturbances including landscape maintenance activities such as mowing and trimming.

Sensitive bird species whose habitat preferences include inland freshwater riparian and wetland habitats may inhabit Los Gatos Creek Trail next to the east project site boundary, and thus may use the project site for incidental foraging. Removal of vegetation that may be used for incidental foraging by sensitive species would not be a significant impact because there is other ornamental vegetation available near Los Gatos Creek, impacts to vegetation on-site would be temporary during demolition and construction, and project development would involve planting a net increase of trees on-site.

Indirect Impacts

During the scoping process for this EIR, members of the community expressed concern regarding potential indirect effects that the project could have on species in the adjacent creek corridor, including potential impacts from lighting and noise. Exterior lighting installed by the project would conform with requirements of City of Campbell Municipal Code Section 21.18.090, Lighting Design Standards. Exterior lighting, including parking lot lighting, would be shielded to prevent light from being emitted across the project property line, to the extent feasible. Exterior lighting would be extinguished or dimmed after business hours, except lighting essential for safety and security.

The project would involve redevelopment of the project site, which would generate temporary construction noise. Construction noise impacts would be less than significant—that is, would not exceed City of Campbell noise standards—with implementation of mitigation measure NOISE-1 (see Chapter 4.10, Noise, of this Draft EIR). Project-generated operational noise audible in the Los Gatos Creek corridor would mainly be noise from motor vehicles in driveways on-site; roadways next to the site are west of the site, on the opposite side of the site from Los Gatos Creek County Park. As described in Chapter 4.10, Noise, of this Draft EIR, project operational noise impacts would be less than significant without mitigation.

Operation of the proposed office use could generate some increase in pedestrian use of the Los Gatos Creek Trail by workers but is not expected to cause a substantial increase in off-trail incursions by people into habitat along the Los Gatos Creek Trail. The project would not directly or indirectly adversely affect special-status species. Therefore, the impact would be *less than significant*.

Significance without Mitigation: Less than significant.

BIO-2	**The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service.**

The project would result in a significant impact if it would adversely affect on-site or nearby riparian habitat or sensitive natural communities. Los Gatos Creek, which passes close to the east site boundary, is mapped as Willow Riparian Forest and Scrub. As described in Chapter 4.8, Hydrology and Water Quality, of this Draft EIR, the project would not discharge runoff at a rate or volume, or polluted runoff, that would significantly impact the hydrology or water quality of Los Gatos Creek.

Two sensitive natural communities, Northern Coastal salt marsh and serpentine bunchgrass, are documented in the Campbell region; however, neither of those communities occur within the project site or in Los Gatos Creek Trail next to the east site boundary. Because there are no riparian habitats or sensitive natural communities on or adjacent to the project site, project development would not impact such communities. Therefore, the impact would be *less than significant*.

Significance without Mitigation: Less than significant.

BIO-3	**The proposed project would not have a substantial 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.**

There are no wetlands on the project site. Wetlands are present next to the east site boundary in Los Gatos Creek—a stream with earthen bed and banks and mapped as Willow Riparian Forest and Scrub—and percolation ponds. As described in Chapter 4.8, Hydrology and Water Quality, project development would not discharge polluted runoff and would not discharge a rate or volume of runoff that would adversely affect water quality. Therefore, the project would not significantly impact the wetlands near the project site and impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

BIO-4	**The proposed project could substantially interfere 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.**

Because the project site is currently developed with an office building, the project site does not offer overland wildlife movement. Therefore, project development would not impact wildlife movement on the project site.

As described under impact discussion BIO-1, project development would not adversely affect sensitive species in the Los Gatos Creek corridor. Therefore, the project would not significantly impact wildlife movement in and along Los Gatos Creek.

Two comments on the Notice of Preparation requested that the EIR analyze impacts of bird strikes on glass windows. Although the project site and land to the north, west, and southwest are currently built

out with urban uses, the numbers of birds flying near the project site is higher than in other urbanized areas of the city due to the adjacency of the Los Gatos Creek corridor next to the eastern site boundary. Although the proposed building façades would not contain mirrored or other highly reflective glass, due to the project's proposed use of glass in building façades and proximity to the Los Gatos Creek corridor, the project could interfere with the movement of birds, which would be a significant impact.

Project development would involve removal of eight (8) trees, located in northeastern portion of the project site and along the south and west site boundary, during site clearance and construction, and thus could interfere with nesting, including destruction of active nests. Although the project proposes replacement landscaping, the loss of vegetation during the construction phase could interfere with nesting animals.

Impacts to wildlife movement due to the temporary loss of on-site vegetation and proposed building design would be *significant*.

Significance without Mitigation: Significant.

Impact BIO-4a: Tree removal and demolition activities during site clearance could destroy active nests, and/or otherwise interfere with nesting of birds protected under State law.

Mitigation Measure BIO-4a: Prior to site clearance, the project applicant shall retain a qualified biologist to conduct preconstruction nesting bird surveys as follows. If tree removal 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 of protected bird species 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.

No surveys are required before vegetation disturbance between September 1 and January 31, that is, outside of the nesting season.

Significance with Mitigation: Less than significant.

Impact BIO-4b: A substantial proportion of the exterior walls of the proposed office building would be constructed with clear glass, which could create a hazard for flying birds.

Mitigation Measure BIO -4b: Proposed building design shall be modified as described below to reduce the likelihood of bird strikes:

- No more than ten (10) percent of façade surface area shall have non-bird-safe glazing. Bird-safe glazing includes opaque glass, covering of clear glass surface with patterns, paned glass with fenestration patterns, and external screens over non-reflective glass.
- Occupancy sensors or other switch control devices shall be installed on non-emergency lights and shall be programmed to shut off during non-work hours and between 10 pm and sunrise. Alternatively, non-emergency lighting shall be shielded to minimize light from buildings that are visible to birds.
- Glass skyways or walkways, freestanding glass walls, and transparent building corners shall not be allowed.
- Transparent glass shall not be allowed at the rooflines of buildings, including in conjunction with green roofs.
- Prior to the issuance of any permits on the project, the project applicant shall work with the City to demonstrate compliance with these measures.

Significance with Mitigation: Less than significant.

BIO-5 The proposed project would conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Redevelopment of the project site as proposed by the project would involve site clearance and demolition, which would include the removal of most of the existing vegetation on-site, including 8 of the 26 trees on-site protected by the City of Campbell's Tree Protection Regulations. The project includes applications for tree removal permits to the City of Campbell Community Development Director; upon issuance of such permits by the Community Development Director, the proposed removals would conform with the City's regulations, and no impact would occur.

Project landscaping could have indirect impacts on habitat along the Los Gatos Creek County Trail next to the project site owned by the SCVWD, which would be a responsible agency for the project should any work occur within the District's adjacent property. Project landscape plans must conform with the SCVWD's *Guidelines and Standards for Land Use Near Streams* (Guidelines). Design Guides 2 and 3, *Use of local native species* and *Use of Ornamental or non-native species*—both in Chapter Guidelines Chapter 4—address selection of species and sourcing of plants for planting in and near streams and riparian areas.

Design Guide 3 is most appropriate for a commercial project such as the proposed project.[27] The project plans have been designed to conform to Design Guides 2 and 3 but, according to SCVWD staff, the landscaping plan should be revised to conform to Design Guide 3 only, which would emphasize the use of non-invasive, drought-tolerate landscaping that would not have the potential to cross-pollinate with native riparian species and local native species. Design Guide 2 is more appropriate for restoration or mitigation sites, and emphasizes the use of locally native riparian species collected from the local watershed. Because the proposed project's landscape plans are not in conformance with SCVWD staff's guidance for compliance with the Guidelines, the impact would be *significant*.

Significance without Mitigation: Significant.

Impact BIO-5: The proposed project's planting plan is not in conformance with the SCVWD's guidance for compliance with the SCVWD's *Guidelines and Standards for Land Use Near Streams*.

Mitigation Measure BIO-5: The planting plan for the proposed project shall be revised to conform to Design Guide 3 of the SCVWD's *Guidelines and Standards for Land Use Near Streams*.

Significance after Mitigation: Less than significant.

BIO-6	**The proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan.**

Although the Los Gatos Creek and Los Gatos Creek Trail next to the east site boundary are within the Habitat Plan, an HCP/NCCP, the project site is not in a HCP or NCCP. Therefore, project development would not conflict with the Habitat Plan, and *no impact* would occur.

Significance without Mitigation: No Impact.

4.3.3 CUMULATIVE IMPACTS

BIO-7	**The proposed project would not result in a significant cumulative impact with respect to biological resources.**

The area considered for cumulative impacts to biological resources is the Habitat Plan, the Permit Area of which includes Los Gatos Creek and the Los Gatos Creek Trail abutting the east project site boundary. The Habitat Plan covers 18 sensitive species; its Permit Area includes seven natural communities and encompasses about 62 percent of Santa Clara County. Habitat assessment surveys, and preconstruction surveys as needed, are required for several covered species in various portions of the Permit Area.

[27] Lisa Brancatelli, Colleen Haggerty, and Linda Spahr, Santa Clara Valley Water District. Personal communication with Cindy McCormick, City of Campbell, and Alexis Mena, PlaceWorks. January 31, 2019.

Development projects must also pay development fees or may dedicate land in lieu of fees. The Habitat Plan also requires several avoidance and minimization measures such as buffers and landscaping restrictions; limits on project footprints and on areas of permitted ground disturbance; and limits on seasons when disturbances are permitted—in various portions of the Permit Area—to minimize impacts on covered species. See Section 4.3.1.3 above for further description of the Habitat Plan.

The cumulative projects listed in Table 4-1 are in urbanized areas and four of the projects are not within the Habitat Plan Permit Area. Unlike the proposed project, none of the proposed projects are located directly adjacent to the Los Gatos Creek corridor. The Samaritan Medical Campus Development Plan is within the Permit Area and is designated as Private Development Area 4: Urban Development Equal to or Greater Than 2 Acres Covered.[28] The Samaritan Medical Campus project is covered by the Habitat Plan and is subject to applicable terms and provisions, including paying a nitrogen deposition fee for indirect impacts to serpentine habitat from project-generated vehicle emissions.[29] Because the project site is not within the Permit Area, it would not contribute to potential cumulative impacts associated with development on lands covered by the Habitat Plan.

Many other projects throughout the county could remove or otherwise impact native habitat suitable for sensitive species, and would thus impact sensitive species directly and/or indirectly. Some projects could be developed within habitat linkages identified in the Habitat Plan. Redevelopment and reuse projects, including those in built-out urban areas, would remove vegetation that could be used for nesting by birds protected under various laws and would remove buildings and trees that could be used for roosting by sensitive bat species. Other projects in the Habitat Plan Permit Area would be required to comply with Habitat Plan requirements for each affected project. Thus, cumulative impacts on the 18 covered sensitive species, and on indirect impacts including suitable habitats for those species, riparian habitats and wetlands, and wildlife movement/migration linkages, would be *less than significant*.

Significance without Mitigation: Less than significant.

[28] Habitat Agency Geobrowser. Santa Clara Valley Habitat Agency, accessed November 14, 2018.
[29] City of San José, 2016, Samaritan Medical Center Master Plan Draft EIR.

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4.4 CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

This chapter describes existing cultural resources on the project site and evaluates the potential environmental consequences on cultural resources from development of the proposed project. A summary of the relevant regulatory setting and existing conditions is followed by a discussion of the proposed project and cumulative impacts.

4.4.1 ENVIRONMENTAL SETTING

4.4.1.1 REGULATORY FRAMEWORK

Federal Regulations

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. As a national policy, it establishes 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 limits the collection of vertebrate fossils and other rare and scientifically significant fossils to qualified researchers who have obtained a permit from the appropriate state or federal agency. Additionally, it specifies these researchers must agree to donate any materials recovered to recognized public institutions, where they will remain accessible to the public and to other researchers. This Act incorporates key findings of a report, *Fossils on Federal Land and Indian Lands*, issued by the Secretary of Interior in 2000, which establishes that most vertebrate fossils and some invertebrate and plant fossils are considered rare resources.[1]

State Regulations

California Environmental Quality Act

California State law provides for the protection of cultural resources by requiring evaluations of the significance of prehistoric and historic resources identified in documents prepared consistent with the California Environmental Quality Act (CEQA). The CEQA Statute is contained in Public Resources Code (PRC) Sections 21000 to 21177 and the CEQA Guidelines are contained in the California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000 to 15387.

[1] U.S. Department of the Interior, 2000, *Fossils on Federal & Indian Lands, Report of the Secretary of the Interior*, https://www.blm.gov/sites/blm.gov/files/programs_paleontology_quick%20links_Assessment%20of%20Fossil%20Management%20on%20Federal%20&%20Indian%20Lands,%20May%202000.pdf, accessed August 13, 2018.

Under CEQA, a cultural resource is considered a "historical resource" if it meets the criteria found in Section 15064.5(a) of the CEQA Guidelines. Under CEQA, the lead agency determines whether projects may have a significant effect on archaeological and historical resources. CEQA Guidelines Section 15064.5 defines what constitutes a historical resource, including: (1) a resource determined by the State Historical Resources Commission to be eligible for the California Register of Historical Resources (including all properties on the National Register); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k); (3) a resource identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) any object, building, structure, site, area, place, record, or manuscript that the City determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the City's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered to be historically significant if it meets the criteria for listing on the California Register enumerated below:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

If the lead agency determines that a project may have a significant effect on a historical resource, the project is determined to have a significant effect on the environment, and these effects must be addressed. However, no further environmental review needs to be completed if, under the qualifying criteria, a cultural resource is not found to be a historical resource or unique archaeological resource.

In addition, PRC Section 21083.2 and Section 15126.4 of the CEQA Guidelines specify lead agency responsibilities to determine whether a project may have a significant effect on archaeological resources. If it can be demonstrated that a project would 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 PRC also details required mitigation if unique archaeological resources are not preserved in place.

Section 15064.5 of the CEQA Guidelines specifies procedures to be used in the event of an unexpected discovery of Native American human remains on non-federal land. These codes protect such remains from disturbance, vandalism, and inadvertent destruction, establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, and establish the Native American Heritage Commission (NAHC) as the authority to identify the most likely descendant and mediate any disputes regarding disposition of such remains.

California Health and Safety Code

California Health and Safety Code Section 7052 states that it is a felony to disturb Native American cemeteries. 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. Section 7050.5(b) outlines the procedures to follow should human remains be inadvertently discovered in any location other than a dedicated cemetery. The section also states that the County Coroner, upon recognizing the remains as being of Native American origin, is responsible to contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC has various powers and duties to provide for the ultimate disposition of any Native American remains, as does the assigned Most Likely Descendant.

Public Resources Code

PRC Section 5097.5 prohibits "knowing and willful" excavation or removal of any "vertebrate paleontological site…or any other archaeological, paleontological or historical feature, situated on public lands, except with express permission of the public agency having jurisdiction over such lands." Public lands are defined to include lands owned by or under the jurisdiction of the State or any city, county, district, authority, or public corporation, or any agency thereof.

State Laws Pertaining to Human Remains

Any human remains encountered during ground-disturbing activities are required to be treated in accordance with California Code of Regulations Section 15064.5(e) (CEQA), PRC Section 5097.98, California Health and Safety Code Section 7050.5. California law protects Native American burials, skeletal remains, and associated grave goods regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. Specifically, Section 7050.5 of the California Health and Safety Code states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are determined to be of Native American origin, the county coroner must contact the California NAHC within 24 hours of this identification. An NAHC representative will then identify a Native American Most Likely Descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods. In addition, CEQA Guidelines Section 15064.5 specifies the procedures to be followed in case of the discovery of human remains on non-federal land. The disposition of Native American burials falls within the jurisdiction of the NAHC.

Assembly Bill 52

Assembly Bill (AB) 52, the Native American Historic Resource Protection Act, sets forth a proactive approach intended to reduce the potential for delay and conflicts between Native American and development interests. Projects subject to AB 52 are those that file a notice of preparation for an EIR or notice of intent to adopt a negative or mitigated negative declaration on or after July 1, 2016. AB 52 adds tribal cultural resources (TCR) to the specific cultural resources protected under CEQA. Under AB 52, a TCR is defined as a site, feature, place, cultural landscape (must be geographically defined in terms of size and scope), sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register, or included in a local register of historical resources. A Native American Tribe or the lead agency, supported by substantial evidence, may choose at

its discretion to treat a resource as a TCR. AB 52 also mandates lead agencies to consult with tribes, if requested by the tribe, and sets the principles for conducting and concluding consultation.

Local Regulations

The City of Campbell's General Plan, adopted in November 2001, contains goals, policies, and strategies related to the protection of cultural resources in its Cultural and Natural Resources Element, as shown in Table 4.4-1.

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

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-1.1b	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.

Source: City of Campbell, 2001, General Plan.

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 the proposed project. 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 that includes the project site. 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.[2]

[2] City of San José, 2011, Envision San Jose 2040 General Plan Draft Program EIR, page 673.

The project site 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.[3]

Outreach to Native American Tribes

In regards to AB 52, the City has not received any request from any Tribes in the geographic area with which it is traditionally and culturally affiliated with or otherwise to be notified about projects in the City of Campbell. A representative from the Native American Heritage Commission indicated that comments may be provided following publication of the Draft EIR. Nonetheless, the evaluation of potential impacts to TCRs is addressed below in Section 4.4.3, Impact Discussion, of this chapter.

Paleontological Resources

Paleontological resources (fossils) are the remains and/or traces of prehistoric plant and animal life exclusive of human remains or artifacts. Fossil remains such as bones, teeth, shells, and wood are found in the geologic deposits (rock formations) in which they were originally buried. Paleontological resources represent a limited, non-renewable, sensitive scientific and educational resource.

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. For this reason, knowledge of the geology of a particular area and the paleontological resource sensitivity of particular rock formations make it possible to predict where fossils will or will not be encountered.

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.[4]

The two nearest known fossil localities to Campbell identified in the Paleontological Background Report for the City of San José 2011 General Plan are UCMP [University of California Museum of Paleontology] V99497 in the City of Saratoga west of Campbell, which yielded fossil horse (*Eqqus* sp.); and UCMP V99597 in the City of San José north of Campbell, which yielded parts of a fossil mammoth (Mammuthus).[5,6]

Although no known paleontological resources exist within the project site, it is possible that undiscovered paleontological resources could be buried on the project site.

[3] Helley, E.J., K.R. La Joie, W.E. Spangle, and M.L. Blair, 1979, Flatland Deposits of the San Francisco Bay Region.

[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] Paleontological Evaluation Report for the Envision San José 2040 General Plan, Santa Clara County, California, https://www.sanjoseca.gov/DocumentCenter/View/2208, accessed November 7, 2018.

[6] Maguire, Kaitlin, and Holroyd, Patricia, 2016, Pleistocene vertebrates of Silicon Valley (Santa Clara County, California), in PaleoBios: Volume 33 1-14, University of California Museum of Paleontology, https://escholarship.org/uc/item/3k43832x, accessed November 7, 2018.

Archaeological 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 for which it 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.

According to the Campbell General Plan EIR published in July 2001, a records search indicated that only one prehistoric archeological site has been recorded in the City of Campbell. However, few archeological studies have been conducted within the city limit. 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]

Modern development and urbanization may have resulted in the burial of cultural or prehistoric resources.[8] Therefore, it is possible that undiscovered archaeological resources could be found on the project site.

Historical Resources

The National Register includes buildings at least 50 years old that have been determined to meet certain criteria, unless deemed to be of exceptional importance. The California State Office of Historic Preservation includes buildings, structures and objects 45 years or older, that have been determined to meet certain criteria, on the California Register. There are no local, State, or federally recognized historic properties within or near the project site.[9,10] According to the City's Historic Resources Inventory and the Historic Inventory Map, there are no architecturally distinctive buildings on the project site. The existing office building on site was constructed in approximately 1975, and therefore does not meet age requirements to be deemed historically significant, and lacks the potential to meet the criteria set forth by the Campbell Municipal Code as stated above.

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

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

[9] California State Office of Historic Preservation, California Historic Resources, http://ohp.parks.ca.gov/ListedResources/?view=county&criteria=43 accessed August 13, 2018.

[10] National Parks Service US Department of the Interior, National Register of Historic Places, http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome, accessed August 3, 2018.

4.4.2 IMPACT DISCUSSION

4.4.2.1 STANDARDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in Section 4.4.2.2 uses the following standards of significance. The proposed project 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 CEQA Guidelines Section 15064.5.
2. Cause a substantial adverse change in the significance of an archeological resource pursuant to CEQA Guidelines 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.
5. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Sections, 21074, 5020.1(k), or 5024.1.
6. In combination with past, present, and reasonably foreseeable projects, result in significant cumulative impacts with respect to cultural resources and tribal cultural resources.

4.4.2.2 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance as identified in Section 4.4.2.1 above.

CULT-1 The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5.

The types of cultural resources that meet the definition of historical resources under PRC 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

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

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 project, are historical archaeological deposits and historical architectural resources. Impacts to historical archaeological resources are discussed under impact discussion CULT-2 below.

The federal, State, and City historic registers do not indicate any historically or architecturally significant buildings designated on the project site. The existing structure on the project site is not of historical significance, and is not listed on any federal, State, or City historic registers. Additionally, the project site is not located within a historic preservation district nor is it identified as a historic landmark.[13] Therefore, with no historical resource on the project site, there would be *no impact* as a result of project implementation.

Significance without Mitigation: No impact.

CULT-2 The proposed project could cause a substantial adverse change in the significance of an archeological resource pursuant to CEQA Guidelines Section 15064.5.

Archaeological deposits that meet the definition of unique archaeological resources under PRC 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 project. 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 some significant archaeological deposits may exist on the project site.

As discussed above, the project site is not located within any area identified by the City of Campbell as being of important historical significance. Prior grading and development on the project site suggests a low possibility of unearthing archaeological artifacts. However, due to proximity of the site to a water resource, Los Gatos Creek, and extensive grading required to construct the proposed parking garage, which proposes partial underground parking, the unearthing of significant archaeological resources during excavation could result.

The City of Campbell General Plan protects the unearthing of archaeological artifacts with Goal CNR-1, specifically with General Plan Strategy CNR-1.1b, which sets forth guidelines in the event that an archaeological resource is discovered during project construction. Without mitigation, potentially unearthing archaeological artifacts on the project site would result in a *significant* impact.

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

[13] City of Campbell, https://www.ci.campbell.ca.us/DocumentCenter/View/5868/Historic-Resource-Inventory-?bidId=, accessed August 13, 2018.

Significance without Mitigation: Significant.

Impact CULT-2: Implementation of the proposed project would have the potential to cause a substantial change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5.

Mitigation Measure CULT-2: If archaeological resources are encountered during excavation or construction, construction personnel shall be instructed to immediately suspend all activity in the immediate vicinity of the suspected resources and the City and a licensed archeologist shall be contacted to evaluate the situation. A licensed archeologist shall be retained to inspect the discovery and make any necessary recommendations to evaluate the find under current CEQA guidelines prior to the submittal of a resource mitigation plan and monitoring program to the City for review and approval prior to the continuation of any on-site construction activity.

Significance with Mitigation: Less than significant.

CULT-3 The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

Although no known paleontological resources have been recorded near or on the project site, 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 project could reach significant depths below the ground surface, particularly when excavating for partial underground parking proposed under the parking garage. Should this occur, damage to, or destruction of, paleontological resources or unique geologic features could result.

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

Significance without Mitigation: Significant.

Impact CULT-3: Implementation of the proposed project would have the potential to directly or indirectly affect a unique paleontological resource or site, or a unique geological feature.

Mitigation Measure CULT-3: In the event that fossils or fossil-bearing deposits are discovered during construction, excavations within 50 feet of the find shall be temporarily halted or diverted. The contractor shall notify a qualified paleontologist to examine the discovery. The paleontologist shall document the discovery as needed, in accordance with Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology 1995), evaluate the potential resource, and assess the significance of the finding 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 the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project

based on the qualities that make the resource important. The project plan shall be submitted to the City for review and approval prior to implementation.

Significance with Mitigation: Less than significant.

CULT-4 The proposed project could disturb human remains, including those interred outside of formal cemeteries.

Human remains associated with pre-contact archaeological deposits may exist on the project site, as sometimes previously unrecorded human remains are encountered during development projects. The proposed project would allow new construction, and the associated ground-disturbing activities would have the potential to uncover and adversely affect human remains. Descendant communities may ascribe religious or cultural significance to such remains, and may view their disturbance as an immitigable impact.

Any human remains encountered during ground-disturbing activities associated with the proposed project would be subject to federal and State regulations, such as the California Health and Safety Code Section 7050.5, PRC 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.

Without mitigation, potentially unearthing human remains on the project site would result in a *significant* impact.

Significance without Mitigation: Significant.

Impact CULT-4: Implementation of the proposed project would have the potential to disturb human remains, including those interred outside of formal cemeteries.

Mitigation Measure CULT-4: In the event a human burial or skeletal element is identified during excavation or construction, work in that location shall stop immediately until the find can be properly treated. The City and the Santa Clara County Coroner's office shall be notified. If deemed prehistoric, the Coroner's office would notify the Native American Heritage Commission who would identify a "Most Likely Descendant (MLD)." The archeological consultant and MLD, in conjunction with the project sponsor, shall formulate an appropriate treatment plan for the find, which might include, but not be limited to, respectful scientific recording and removal, being left in place, removal and reburial on site, or elsewhere. Associated grave goods are to be treated in the same manner.

Significance with Mitigation: Less than significant.

CULT-5 The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Sections, 21074, 5020.1(k), or 5024.1.

A Tribal Cultural Resource (TCR) is defined as a site, feature, place, cultural landscape (must be geographically defined in terms of size and scope), sacred place, or object with cultural value to a California Native American tribe that is either included or eligible for inclusion in the California Register, or included in a local register of historical resources, or if the City of Campbell, acting as the lead agency, supported by substantial evidence, chooses at its discretion to treat the resources as a TCR. The City has not received any request from any Native American Tribes in the geographic area with which it is traditionally and culturally affiliated to be notified about projects in Campbell.

No known archeological resources, ethnographic sites, or Native American remains are located on the project site. As discussed under impact discussions CULT-2 and CULT-4, without mitigation, potentially unearthing archaeological artifacts and human remains could be significant. These same mitigation measures would be required to address TCRs. Therefore, impacts to TCRs would be *significant*.

Significance without Mitigation: Significant.

Impact CULT-5: Implementation of the proposed project would have the potential to disturb tribal cultural resources.

Mitigation Measure CULT-5: Implement Mitigation Measures CULT-2 and CULT-4.

Significance with Mitigation: Less than significant.

4.4.3 CUMULATIVE IMPACTS

CULT-6 The proposed project would result in less-than-significant cumulative impacts with respect to cultural resources.

Cumulative cultural resource impacts would occur when a series of actions leads to the loss of a substantial type of site, building, or resource. For example, while the loss of a single historic building may not be significant to the character of a neighborhood or streetscape, continued loss of such resources on a project-by-project basis could constitute a significant cumulative effect. This is most obvious in historic districts, where destruction or alteration of a percentage of the contributing elements may lead to a loss of integrity for the district overall. For example, changes to the setting or atmosphere of an area by adding modern structures on all sides of a historically significant building, thus altering the aesthetics of the streetscape, would create a significant impact. Destruction or relocation of historic buildings would also significantly impact the setting.

The analysis of cumulative impacts to cultural resources is based on impacts of the proposed project plus developments in the vicinity of the project site. For instance, three of the five cumulative projects identified in Table 4-1 in Chapter 4.0, Environmental Analysis, of this Draft EIR are at distances between 0.3 mile and 0.7 mile from the proposed project site.

The project site does not contain any designated historic resources. As there are no significant historic structures and no known archaeological resources, paleontological resources, or human remains on the

project site, development of the proposed project would not create or contribute to a cumulative impact to cultural resources. Mitigation Measures CULT-2 and CULT-3 would ensure that any buried archaeological or paleontological resources, including TCRs, if encountered, would be properly handled. Additionally, Mitigation Measure CULT-4 would ensure that any potential human remains, including tribal cultural resources, encountered during site excavation would be properly handled. Additionally, the existing federal, State, and local regulations and policies described throughout this chapter serve to protect any as-yet-undiscovered cultural resources in Campbell. Continued compliance with these regulations and implementation of existing City policies and requirements would preclude impacts to the maximum extent practicable.

Therefore, in combination with past, present, and reasonably foreseeable projects, the proposed project would result in a *less-than-significant* cumulative impact with respect to all cultural resources.

Significance without Mitigation: Less than significant.

4.5 GEOLOGY, SOILS, AND SEISMICITY

This chapter describes the regulatory framework and existing conditions on the project site related to geology and soils, and contains an evaluation of the potential environmental consequences associated with the construction and operation of the proposed project that are related to geology and soils.

The information in this section is based on the following technical study: Geotechnical Investigation, completed by Silicon Valley Soil Engineering on November, 2017.

A complete copy of this report is included in Appendix E to this Draft EIR.

4.5.1 ENVIRONMENTAL SETTING

4.5.1.1 REGULATORY FRAMEWORK

Federal

Clean Water Act

Under the Clean Water Act (CWA) of 1977, the United States Environmental Protection Agency (EPA) seeks to restore and maintain the chemical, physical, and biological integrity of the nation's waters. The statute employs a variety of regulatory and nonregulatory tools to reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. The CWA authorizes the EPA to implement water quality regulations. Please see Section Chapter 4.8, Hydrology and Water Quality, of this Draft EIR for more detail.

National Pollution Discharge Elimination System

The CWA established the National Pollution Discharge Elimination System (NPDES) permit program to regulate municipal and industrial discharges to surface waters of the United States from their municipal separate storm sewer systems.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act[1] was passed in 1972 to mitigate the hazard of surface faulting to structures used for human occupancy. The chief purpose of the Act is to prevent the construction of buildings used for human occupancy on top of active faults. The Act addresses the hazard of surface fault rupture. It does not address other earthquake-related hazards, such as ground shaking or seismically induced landslides or liquefaction.[2]

[1] Originally known as the *Alquist-Priolo Special Studies Zones Act* until renamed in 1993.

[2] California Geological Survey, 2017, Alquist-Priolo Earthquake Fault Zones, http://www.conservation.ca.gov/cgs/rghm/ap/Pages/main.aspx, accessed August 23, 2018.

The Act requires the State Geologist to establish regulatory zones (known as Earthquake Fault Zones or Alquist-Priolo Zones) around the surface traces of active faults, and to issue appropriate maps.[3] The maps are then distributed to the affected cities, counties, and State agencies for their use in planning and controlling new or renewed construction. Pursuant to the Act, construction within 50 feet of an active fault zone is prohibited.

Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act was passed in 1990 to address earthquake hazards such as seismically induced liquefaction and landsliding.[4] Under the Act, seismic hazard zones are mapped through the California Geological Survey's Seismic Hazards Zonation Program to identify areas prone to earthquake-induced liquefaction, landslides, and amplified ground shaking. The purpose of the Act is to reduce the threat to public health and safety and to minimize the loss of life and property that may result from earthquake-triggered ground failure. More specifically, Section 2691(c) of 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**."**[5] Section 2697(a) of the Act states: "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."[6]

California Building Code

The California Building Code (CBC) is included in Title 24, known as the California Building Standards Code, of the California Code of Regulations. The CBC incorporates the International Building Code, a model building code adopted across the United States. The CBC is updated every 3 years, and the current 2016 version took effect January 1, 2017. The 2019 CBC will become effective on January 1, 2020. The project shall comply with the building code that is in effect at the time of submittal for a building permit.

Statewide General Construction Permit

Construction projects of 1 acre or more are regulated under the General Construction Permit (GCP), Order No. 2012-0006-DWQ, issued by the State Water Resources Control Board in 2012. Projects obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan estimating sediment risk from construction activities to receiving waters, and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater.

[3] Earthquake Fault Zones are regulatory zones around active faults. The zones vary in width, but average about ¼ mile wide.

[4] California Geological Survey, Fact Sheet – Seismic Hazards Zonation Program, http://www.conservation.ca.gov /cgs/shzp/Documents/SHZ_FactSheet.pdf, accessed August 23, 2018.

[5] California Public Resource Code, Division 2, Chapter 7.8, Section 2691(c).

[6] California Public Resource Code, Division 2, Chapter 7.8, Section 2697(a).

Local

The City's Municipal Code contains the following sections relevant to potential geological impacts of the proposed project:

- Chapter 18.04 – Building Code. The purpose of this chapter is to provide regulations for construction, alteration, renovation, and remodeling of buildings and structures. This code enforces provisions in the California Building Code.
- Chapter 20.80 – Environmental Impact and Grading and Erosion Control. The purpose of this chapter is to provide conditions of approval for subdivision maps for grading and erosion control to prevent sedimentation or damage to the site or surrounding properties.

4.5.1.2 EXISTING CONDITIONS

Regional Geology

The site lies in the San Francisco Bay Region, which is part of the Coast Range province. The regional structure is dominated by the northwest trending Santa Cruz Mountains to the southwest and the Diablo Range across the San Francisco Bay to the northeast. The site lies on the east flank of the Santa Cruz Mountains.

Project Site

The subject site is bound by Dell Avenue to the west, properties developed with a mix of commercial, office, and light industrial uses, with Los Gatos Creek along the southeast edge of the property. The site is relatively level, with no major changes in grade, and is occupied by multi-unit office buildings surrounded by a paved parking lot.

A geotechnical investigation dated November 13, 2017 was completed for the project site by Silicon Valley Soil Engineering. Soil samples were collected on the project site to depths ranging from 20 feet to 50 feet below existing ground surface. In paved areas, surface soil consists of 3 inches of asphalt concrete over 4 inches of aggregate base. Below the pavement section to a depth of 7 feet, the site investigation encountered a brown, damp, very stiff sandy silt layer. From the depths of 7 to 13 feet, the soil is brown, dry, dense silty gravel. The gravel is poorly graded. From the depths of 13 feet to 28 feet, the soil is brown, damp, dense, sandy gravel. From the depths of 28 to 50 feet, the site investigation encountered a greenish gray, moist, dense clayey sand layer.

The site investigation encountered groundwater to the depth of 17 feet. The groundwater depth fluctuated during the duration of the geotechnical investigation but stabilized at 15 feet at the completion of the drilling operation.

Seismic Hazards

Faults

There are five major faults within about 5 miles of the project site (see Figure 4.5-1):

- Monte Vista-Shannon: 0.4 miles east of the project site.
- Cascade: 0.7 miles southwest of the project site.
- Berrocal: 2.3 miles southwest of the project site.
- San Jose: 4.4 miles northeast of the project site.
- Stanford: 3.5 miles northeast of the project site.

Although the site is in close proximity to several faults, the site is not within a State of California Earthquake Fault Zone.[7]

Ground Shaking

The San Francisco Bay region is a seismically active region. Impacts from ground shaking could occur many miles from an earthquake epicenter. The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude, and the nature of the earth materials beneath a given site. There are several known faults in the San Francisco Bay region. The project site is likely subject to strong ground shaking due to earthquakes on nearby faults.

Liquefaction

Liquefaction refers to loose, saturated sand or silt deposits that behave as a liquid and lose their load-supporting capability when strongly shaken. Loose granular soils and silts that are saturated by relatively shallow groundwater are susceptible to liquefaction.

The project site is located within a seismic hazard zone for liquefaction[8] and therefore the geotechnical investigation sampled and tested suspected liquefiable soil layers. Soil layers up to a depth of 15 feet were found not to be liquefiable because they are above the highest expected groundwater table level. Soil layers from the depths of 15 to 50 feet were found to be dense, and thus not susceptible to liquefaction. Therefore, the potential for liquefaction under the site is minimal.

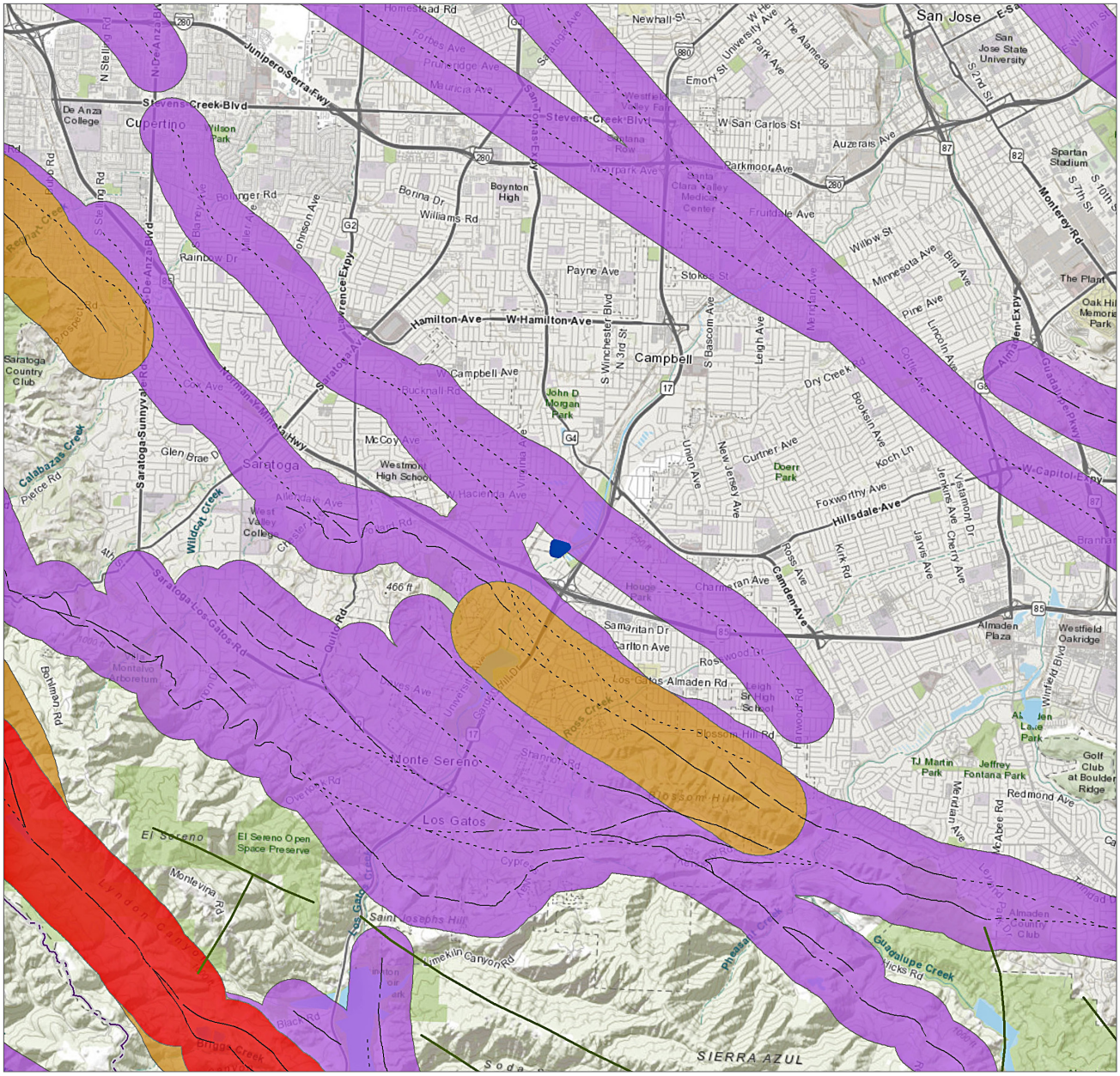
Landslides

Landslides are the downslope movement of geologic materials. Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. The project site is located within a seismic hazard zone for landslides. [9] However, the site is relatively level with no major changes in grade and is

[7] California Department of Conservation, 2015, Fault Activity Map of California (2010), http://maps.conservation.ca.gov/cgs/fam/, accessed August 23, 2018.

[8] California Department of Conservation, 2015, CGS Information Warehouse: Regulatory Maps, http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps, accessed August 23, 2018.

[9] California Department of Conservation, 2015, CGS Information Warehouse: Regulatory Maps, http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps, accessed August 23, 2018.



NOTE: Fault traces on land are indicated by solid lines where well located, by dashed lines where approximately located or inferred, and by dotted lines where concealed by younger rocks or by lakes or bays.

Source: ESRI, 2018. PlaceWorks, 2018.

0 1
Scale (Miles)

Figure 4.5-1
Fault Map

located 2.5 miles from the foothills of the Santa Cruz Mountains. Therefore, the site is not considered to be susceptible to landslides.

Other Geologic Hazards

Collapsible Soils

Changes in moisture content can cause soils to exhibit volumetric changes, affecting the performance of any supported structures. Depending upon the moisture in the ground, soils may experience changes in volume of as much as 30 percent or more. Conversely, during periods of falling soil moisture, expansive soils will shrink and result in structure settlement. In addition, some unsaturated soils may be subject to collapse of the loose soil matrix due to dissolving of the cemented bonds within the matrix.

The site investigation tested soils on the site, up to a depth of 50 feet, to assess how dense the soils are. The soils have a density that makes them not susceptible to collapse.

Subsidence

Land subsidence refers to the lowering of the ground surface due to extraction or lowering of water levels or other stored fluids within the subsurface soil pores, or due to seismic activity that can cause alluvial sediments to compact. The major cause of ground subsidence is withdrawal of groundwater. The project site is in a region mapped as an area of subsidence due to excessive groundwater extraction.[10] The potential for future ground subsidence in the Santa Clara Valley is considered low. Historic ground subsidence in the Santa Clara Valley between about 1915 and 1969 was essentially halted by about 1970 by using imported water and local surface water to supplement groundwater and maintain water reliability. The Santa Clara County Water District carefully monitors and manages water supplies to minimize the risk of subsidence recurring.[11]

Expansive Soils

Expansive soils contain substantial amounts of clay that swells when wetted and shrinks when dried; the swelling or shrinking can shift, crack, or break structures built on such soils. Based on the lack of clay in the top 20 feet of the soil profile, the potential for expansive soils at the project site is negligible.

Erosion

Erosion is the movement of soil from place to place and is a natural process. The main natural agents of erosion in the region are wind and flowing water. Erosion can be accelerated dramatically by ground-disturbing activities if effective erosion control measures are not used. Soil can be carried off construction sites or bare land by wind and water and tracked off construction sites by vehicles.

[10] US Geological Survey, 2018, Areas of Land Subsidence in California, https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html accessed November 9, 2018.

[11] Santa Clara County Water District, 2016, Groundwater Management Plan, https://s3.us-west-2.amazonaws.com/assets.valleywater.org/2016%20Groundwater%20Management%20Plan.pdf accessed November 8, 2018.

The project site is fully developed with very little exposed soils and no water courses on site. Therefore, the potential for soil erosion on the site is negligible.

4.5.2 IMPACT DISCUSSION

4.5.2.1 STANDARDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in Section 4.5.2.2 uses the following standards of significance. The proposed project would result in a significant geology and soils impact if it would:

1. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.
    - Strong seismic ground shaking.
    - Seismic-related ground failure, including liquefaction.
    - Landslides.
2. Result in substantial soil erosion or the loss of topsoil.
3. Result in a significant impact related to development on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
4. Create substantial risks to life or property as a result of its location on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property.
5. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater.
6. In combination with past, present, and reasonably foreseeable projects, result in significant cumulative impacts with respect to geology and soils.

Pursuant to a 2015 California Supreme Court decision (*California Building Industry Association vs. Bay Area Air Quality Management District*, 62 Cal.4th 369), impacts of the environment on a project are now excluded from the California Environmental Quality Act (CEQA), with certain exceptions. One exception is

where development of a project would exacerbate an existing hazard. Two examples of this as it pertains to geology and soils are: 1) where ground disturbance by a project could expose people and/or the environment to existing soil contamination and 2) a project contributing to the potential for soil collapse by wetting soil (such as by irrigation) and/or placing a load (such as a building) on soil. However, a project attracting increased numbers of people to a place affected by an existing hazard, for instance by building structures on an active fault, is no longer an impact within the purview of CEQA. Therefore, the analysis in this chapter focuses on whether the project development would exacerbate an existing hazard.

4.5.3 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance as identified in Section 4.5.2.1 above.

GEO-1	**The project would not exacerbate hazards from surface rupture of a known active fault, strong seismic ground shaking, seismic-related ground failure, or landslides.**

No known faults cross the project site, and the nearest known active fault to the site is the Monte Vista-Shannon Fault about 0.4 miles to the east. Surface rupture of a known active fault is not a hazard on-site and therefore the project would not exacerbate existing surface rupture hazards on-site.

Ground shaking on-site is expected to occur in the design lifetimes of the proposed buildings. Project design and construction would conform with CBC standards for earthquake resistance and the seismic design criteria provided in the geotechnical investigation report. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground motion with a specified probability at the site. The project geotechnical investigation provides seismic site coefficients for use in design and construction of the proposed project. Therefore, project development would not exacerbate hazards from ground shaking.

Although the project site is located within a seismic hazard zone for liquefaction, the geotechnical investigation prepared for the project indicated that soils above a depth of 15 feet are non-liquefiable due to the absence of groundwater and soils below a depth of 15 feet are not susceptible to liquefaction due to their high density. Therefore, the site is not susceptible to liquefaction hazards that could be exacerbated by the project.

The project site is relatively level and is not located in close proximity to steep slopes; thus, there is no landslide hazard on-site that would be exacerbated by project development.

Compliance with existing building regulations and adherence to recommendations of the project geotechnical investigation would ensure that existing geological and seismic hazards would not be exacerbated; therefore, impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

GEO-2	The proposed project would not result in substantial soil erosion or the loss of topsoil.

The proposed project would include the demolition of the existing structures and the construction of a 161,870-square-foot four-story office building, a 146,478-square-foot five-story parking garage (with additional underground parking), additional surface parking, and an on-site public open space area. The excavation for the underground parking would be approximately 8 to 10 feet below the existing ground elevation. Clearing, grading, excavation, demolition, and construction activities associated with the proposed project could cause soil erosion and increase the amount of silt and debris carried in runoff.

To minimize these potential impacts, the proposed project would be required to comply with the Statewide GCP as well as prepare a stormwater pollution prevention plan that requires the incorporation of best management practices to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. Because the project would disturb more than 1 acre, coverage under the Statewide GCP applies. The GCP requires that, prior to the start of construction activities, the project applicant must file Permit Registration Documents with the State Water Resources Control Board, which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, stormwater pollution prevention plan, and post-construction water balance calculations.

In addition, the project must comply with the City of Campbell's existing regulatory requirements, including Chapter 20.80, Environmental Impact and Grading and Erosion Control, which requires compliance with the requirements for grading and erosion control.

Adherence to applicable water quality regulations, preparation of a stormwater pollution prevention plan, and compliance with the City of Campbell's Municipal Code would ensure that soil erosion is minimized during construction. Consequently, soil erosion impacts would be *less than significant.*

Significance without Mitigation: Less than significant.

GEO-3	The project would not result in a significant impact related to development on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

Liquefaction

Project development would not exacerbate liquefaction hazards, as described above under impact discussion GEO-1.

Lateral Spreading

Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. Hazards from lateral spreading are addressed in the liquefaction impact analysis under impact discussion GEO-1.

Landslide

The project site and surroundings are nearly level and are not subject to landslides, as described above under impact discussion GEO-1.

Subsidence

The major cause of ground subsidence is the excessive withdrawal of groundwater. The potential for ground subsidence in the project region is considered low. Project construction would not involve dewatering, since the groundwater level is 15 feet below the existing ground elevation and excavation for parking structures would be 8 to 10 feet below the existing ground elevation. Excavation for parking structures on-site would therefore be above the groundwater table and no dewatering would be required during construction. Therefore, the site is considered at a low risk of subsidence and project development would not exacerbate subsidence hazards.

Collapsible Soils

As confirmed by the on-site soil investigation, soils layers from a depth of 7 feet to 50 feet are dense. The soils have a density that makes the potential for collapse negligible.

Summary

No significant impact arising from any of the types of unstable soils addressed in this section would occur. Therefore, the impact would be *less than significant*.

Significance without Mitigation: Less than significant.

GEO-4	**The project would not create substantial risks to life or property as a result of its location on expansive soil, as defined in Table 18-1-B of the Uniform Building Code.**

Expansive soils contain substantial amounts of clay. The top 28 feet of soil on-site consist of a sandy silt layer, a silty gravel layer, and a sandy gravel layer. Clayey soils only appear at a depth greater than 28 feet.

Based on the lack of clay in the top 20 feet of the soil profile, the potential for expansive soils at the site is negligible.

Significance without Mitigation: Less than significant.

GEO-5 Project development would involve installation of new sewer laterals and would not use alternative wastewater disposal systems.

Project development would include installation of new sewer laterals connecting to existing sewer mains in surrounding roadways. Project development would not use septic tanks or other alternative wastewater disposal systems. Therefore, *no impact* would occur.

Significance without Mitigation: No impact.

4.5.4 CUMULATIVE IMPACTS

GEO-6 The proposed project, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to geology and soils.

Geology and soils impacts are site specific and generally do not combine to result in cumulative impacts. Similar to the proposed project, future development projects would be required to comply with applicable State and local building regulations including the CBC and the City of Campbell's Municipal Code Chapters 18.04 and 20.80.

Cumulative projects are identified in Table 4-1 of this Draft EIR. The cumulative projects in close proximity to the proposed project site include a medical office building at 250 East Hacienda Avenue in Campbell approximately 0.3 miles to the north, the North Forty Specific Plan approximately 0.5 miles to the south and the Samaritan Medical Campus Development Plan approximately 0.7 miles to the southeast. The North Forty Specific Plan is located within the City of Los Gatos, and therefore would be required to comply with the City of Los Gatos Municipal Code Chapter 6, Buildings and Building Regulations. The Samaritan Medical Campus Development Plan is located within the City of San José, and thus would be required to comply with the City of San José Municipal Code Chapter 17.04, Building Code.

Furthermore, projects that disrupt more than 1 acre are required to comply with the Statewide GCP. The GCP requires that, prior to the start of construction activities, project applicants must file Permit Registration Documents with the State Water Resources Control Board, which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, stormwater pollution prevention plan, and post-construction water balance calculations. Cumulative projects must also comply with Campbell's City Municipal Code regulations pertaining to stormwater pollution control and site-specific geologic hazards addressed in each project's geotechnical investigation. Therefore, no significant cumulative impact would occur and the impact is *less than significant*.

Significance without Mitigation: Less than significant.

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4.6 GREENHOUSE GAS EMISSIONS

This chapter evaluates the potential environmental impacts associated with the development of the proposed project. This analysis in this chapter is based on the methodology recommended by the Bay Area Air Quality Management District's (Air District) project-level review criteria, using preliminary information available. GHG emissions are based on average daily trips (ADT) for the on-road transportation emissions section and energy use based on CalEEMod 2016.3.2 defaults and the City's Community Choice Aggregate (CCA) electricity carbon intensity factor. The GHG emissions modeling is included in Appendix B, *Air Quality and Greenhouse Gas Data*, of this Draft EIR.

The following are definitions for terms used throughout this section.

- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a greenhouse gas absorbs relative to a molecule of carbon dioxide (CO_2) over a given period of time (20, 100, and 500 years). CO_2 has a GWP of 1.
- **Carbon dioxide-equivalent (CO_2e)**. The standard unit to measure the amount of greenhouse gases in terms of the amount of CO_2 that would cause the same amount of warming. CO_2e is based on the GWP ratios between the various GHGs relative to CO_2.
- **$MTCO_2e$.** Metric ton of CO_2e.
- **$MMTCO_2e$.** Million metric tons of CO_2e.

4.6.1 ENVIRONMENTAL SETTING

4.6.1.1 GREENHOUSE GASES AND CLIMATE CHANGE

Scientists have concluded that human activities contribute to global climate change by adding large amounts of heat-trapping gases, known as GHG, to the atmosphere. The primary source of GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHG—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that may cause an increase in global average temperatures observed within the 20th and 21st centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[1,2,3] The major GHGs are briefly described as follows:

[1] Intergovernmental Panel on Climate Change, 2001, Third Assessment Report: Climate Change 2001, New York: Cambridge University Press.

[2] 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 because it is considered part of the feedback loop of changing radiative forcing rather than a primary cause of change.

[3] 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-

GREENHOUSE GAS EMISSIONS

- **Carbon dioxide (CO_2)** enters the atmosphere through the burning of fossil fuels (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 (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 municipal landfills and water treatment facilities.
- **Nitrous oxide (N_2O)** is emitted during agricultural and industrial activities as well as during combustion of fossil fuels and solid waste.

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have a stronger greenhouse effect than others. These are referred to as high global warming potential (GWP) gases. The GWP of applicable 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 contribute to the greenhouse effect. For example, under IPCC's Fourth Assessment Report (AR4) GWP values for methane (CH_4), a project that generates 10 metric tons (MT) of CH_4 would be equivalent to 250 MT of CO_2.[4]

TABLE 4.6-1 GHG EMISSIONS AND THEIR RELATIVE GLOBAL WARMING POTENTIAL COMPARED TO CO_2

GHGs	Second Assessment Report Atmospheric Lifetime (Years)	Fourth Assessment Report 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	50 to 200	1	1
Methane[b] (CH_4)	12 (±3)	12	21	25
Nitrous Oxide (N_2O)	120	114	310	298

Note: The IPCC has published updated global warming potential (GWP) values in its Fifth Assessment Report[5] 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).
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, 1995, Second Assessment Report: Climate Change 1995; Intergovernmental Panel on Climate Change, 2007, Fourth Assessment Report: Climate Change 2007, New York: Cambridge University Press.

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. 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 (California Air Resources Board, 2017, March 14. Short-Lived Climate Pollutant Reduction Strategy, https://www.arb.ca.gov/cc/shortlived/shortlived.htm). However, State and national GHG inventories do not 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.

[4] 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.

[5] Intergovernmental Panel on Climate Change, 2013, Fifth Assessment Report: Climate Change 2013, New York: Cambridge University Press.

California's GHG Sources and Relative Contribution

In 2018, the statewide GHG emissions inventory was updated for 2000 to 2016 emissions using the GWPs in IPCC's AR4.[6] Based on these GWPs, California produced 429.4 $MMTCO_2e$ GHG emissions in 2016. California's transportation sector was the single largest generator of GHG emissions, producing 40.5 percent of the state's total emissions. Industrial sector emissions made up 23.4 percent, and electric power generation made up 16.1 percent of the state's emissions inventory. Other major sectors of GHG emissions include commercial and residential (12.0 percent), agriculture and forestry (7.9 percent) and other (solvents and chemicals) at 0.2 percent.[7]

California's GHG emissions have followed a declining trend since 2007. In 2016, emissions from routine GHG emitting activities statewide were 429 $MMTCO_2e$, 12 $MMTCO_2e$ lower than 2015 levels or 12 $MMTCO_2e$ lower than 2015 levels. This represents an overall decrease of 13 percent since peak levels in 2004 and 2 $MMTCO_2e$ below the 1990 level and the State's 2020 GHG target. During the 2000 to 2016 period, per capita GHG emissions in California have continued to drop from a peak in 2001 of 14.0 $MTCO_2e$ per capita to 10.8 $MTCO_2e$ per capita in 2016, a 23 percent decrease. Overall trends in the inventory also demonstrate that the carbon intensity of California's economy (the amount of carbon pollution per million dollars of gross domestic product (GDP)) is declining, representing a 38 percent decline since the 2001 peak, while the state's GDP has grown 41 percent during this period.[8]

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 the quantity of climate change pollutants in the Earth's atmosphere that is attributable to human activities. The amount of CO_2 in the atmosphere has increased by more than 35 percent since preindustrial times and has increased at an average rate of 1.4 parts per million per year since 1960, mainly due to combustion of fossil fuels and deforestation.[9] These recent changes in the quantity and concentration of climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants.[10] 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 that environmental

[6] 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).

[7] California Air Resources Board, 2018, 2018 Edition California Greenhouse Gas Inventory for 2000-2016: By Category as Defined in the 2008 Scoping Plan. https://www.arb.ca.gov/cc/inventory/data/data.htm.

[8] California Air Resources Board, 2018, California Greenhouse Emissions for 2000 to 2016 – Trends of Emissions and Other Indicators. https://www.arb.ca.gov/cc/inventory/data/data.htm.

[9] Intergovernmental Panel on Climate Change, 2007, *Fourth Assessment Report: Climate Change 2007*, New York: Cambridge University Press.

[10] California Climate Action Team, 2006, Climate Action Team Report to Governor Schwarzenegger and the Legislature.

impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime.[11]

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. Projections of climate change depend heavily upon future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions and on observations of 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. For example, there are varying degrees of certainty on the magnitude 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/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.
- Larger areas affected by drought.
- Intense tropical cyclone activity increases.
- Increased incidence of extreme high sea level (excluding tsunamis).

Potential Climate Change Impacts for California

Observed changes over the last several decades across the western United States reveal clear signs of climate change. Statewide average temperatures increased by about 1.7 degrees Fahrenheit (°F) from 1895 to 2011, and warming has been greatest in the Sierra Nevada.[12] The years from 2014 through 2016 have shown unprecedented temperatures with 2014 being the warmest.[13] By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 4.1 to 8.6°F, depending on emissions levels.[14]

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) advanced shift in the timing of snowmelt of 5 to 30 days earlier in the spring; and 5) a similar shift (5 to

[11] Intergovernmental Panel on Climate Change, 2007, *Fourth Assessment Report: Climate Change 2007*, New York: Cambridge University Press.

[12] California Climate Change Center, 2012, Our Changing Climate 2012: Vulnerability and Adaptation to the Increasing Risks from Climate Change in California.

[13] Office of Environmental Health Hazards Assessment, 2018, Indicators of Climate Change in California, https://oehha.ca.gov/media/downloads/climate-change/report/2018caindicatorsreportmay2018.pdf, accessed July 16, 2018.

[14] California Climate Change Center, 2012, Our Changing Climate 2012: Vulnerability and Adaptation to the Increasing Risks from Climate Change in California.

30 days earlier) in the timing of spring flower blooms.[15] Overall, California has become drier over time with 5 of the 5 years of severe to extreme drought occurring between 2007 and 2016, with unprecedented dry years occurring in 2015 and 2015.[16] Statewide precipitation has become increasingly variable from year-to-year with the driest consecutive 4 years occurring from 2012 to 2015.[17] According to the California Climate Action Team—a committee of state agency secretaries and the heads of agencies, 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 degrees Celsius (°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 impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy:

- Water Resources Impacts. By late this century, all projections show drying, and half of the projections suggest 30-year average precipitation will decline by more than 10 percent below the historical average. This drying trend is caused by an apparent decline in the frequency of rain and snowfall. Even in projections with relatively little or no decline in precipitation, central and southern parts of the state are expected to be drier from the warming effects alone because the spring snowpack will melt sooner, and the moisture in soils will evaporate during long dry summer months.[18]
- Wildfire Risks. Earlier snowmelt, higher temperatures, and longer dry periods over a longer fire season will directly increase wildfire risk. Indirectly, wildfire risk will also be influenced by potential climate-related changes in vegetation and ignition potential from lightning. Human activities will continue to be the biggest factor in ignition risk. The number of large fires statewide is estimated to increase by 58 percent to 128 percent above historical levels by 2085. Under the same emissions scenario, estimated burned area will increase by 57 percent to 169 percent, depending on location.[19]
- Health Impacts. Many of the gravest threats to public health in California stem from the increase of extreme conditions, principally more frequent, more intense, and longer heat waves. Particular concern centers on the increasing tendency for multiple hot days in succession, and simultaneous heat waves in several regions throughout the state. Public health could also be affected by climate change impacts on air quality, food production, the amount and quality of water supplies, energy pricing and availability, and the spread of infectious diseases. Higher temperatures also increase ground-level ozone levels. Furthermore, wildfires can increase particulate air pollution in the major air basins of California.[20]

[15] California Climate Action Team, 2006, Climate Action Team Report to Governor Schwarzenegger and the Legislature.

[16] Office of Environmental Health Hazards Assessment, 2018, Indicators of Climate Change in California, https://oehha.ca.gov/media/downloads/climate-change/report/2018caindicatorsreportmay2018.pdf, accessed July 16, 2018.

[17] Office of Environmental Health Hazards Assessment, 2018, Indicators of Climate Change in California, https://oehha.ca.gov/media/downloads/climate-change/report/2018caindicatorsreportmay2018.pdf, accessed July 16, 2018.

[18] California Council on Science and Technology, 2012, California's Energy Future: Portraits of Energy Systems for Meeting Greenhouse Gas Reduction Targets, https://ccst.us/wp-content/uploads/2012ghg.pdf, accessed December 5, 2018.

[19] California Council on Science and Technology, 2012, California's Energy Future: Portraits of Energy Systems for Meeting Greenhouse Gas Reduction Targets, https://ccst.us/wp-content/uploads/2012ghg.pdf, accessed December 5, 2018.

[20] California Council on Science and Technology, 2012, California's Energy Future: Portraits of Energy Systems for Meeting Greenhouse Gas Reduction Targets, https://ccst.us/wp-content/uploads/2012ghg.pdf, accessed December 5, 2018.

TABLE 4.6-2 SUMMARY OF GHG EMISSIONS RISK TO CALIFORNIA

Impact Category	Potential Risks
Public Health Impacts	Heat waves will be more frequent, hotter, and longer Poor air quality made worse Higher temperatures increase ground-level ozone (i.e., smog) levels
Water Resource 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 Shrinking beaches 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

Sources: California Climate Change Center, 2012, Our Changing Climate 2012: Vulnerability and Adaptation to the Increasing Risks from Climate Change in California; California Energy Commission, 2006, Our Changing Climate: Assessing the Risks to California, 2006 Biennial Report, CEC-500-2006-077; California Energy Commission, 2009, The Future Is Now: An Update on Climate Change Science, Impacts, and Response Options for California. CEC-500-2008-0077; California Natural Resources Agency, 2014, Safeguarding California: Reducing Climate Risk, An Update to the 2009 California Climate Adaptation Strategy.

- Increase Energy Demand. Increases in average temperature and higher frequency of extreme heat events combined with new residential development across the state will drive up the demand for cooling in the increasingly hot and longer summer season and decrease demand for heating in the cooler season. Warmer, drier summers also increase system losses at natural gas plants (reduced efficiency in the electricity generation process at higher temperatures) and hydropower plants (lower reservoir levels). Transmission of electricity will also be affected by climate change. Transmission lines lose 7 percent to 8 percent of transmitting capacity in high temperatures while needing to transport greater loads. This means that more electricity needs to be produced to make up for the loss in capacity and the growing demand.[21]

[21] California Council on Science and Technology, 2012, California's Energy Future: Portraits of Energy Systems for Meeting Greenhouse Gas Reduction Targets, https://ccst.us/wp-content/uploads/2012ghg.pdf, accessed December 5, 2018.

4.6.1.2 REGULATORY FRAMEWORK

This section summarizes key federal, State, regional, and City regulations and programs related to GHG emissions resulting from the proposed project.

Federal Regulations

The United States 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 EPA's 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 themselves impose any emission reduction requirements but allowed the EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation.[22]

To regulate GHGs from passenger vehicles, the EPA was required to issue an endangerment finding.[23] The finding identifies emissions of six key GHGs: CO_2, CH_4, N_2O, HCFCs, PFCs, and SF_6. The first three are applicable to the project's GHG emissions inventory because they constitute the majority of GHG emissions and, per Air District guidance, are the GHG emissions that should be evaluated as part of a project's GHG emissions inventory.

US 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 (large stationary sources, etc.) to report GHG emissions data. Facilities that emit 25,000 metric tons (MT) or more of CO_2e per year are required to submit an annual report.

Update to Corporate Average Fuel Economy Standards (2010 to 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 to 2025, which will require a fleet average of 54.5 mpg in 2025. However, the EPA is reexamining the 2017–2025 emissions standards.

[22] US Environmental Protection Agency, 2009, EPA: Greenhouse Gases Threaten Public Health and the Environment, https://yosemite.epa.gov/opa/admpress.nsf/0/08d11a451131bca585257685005bf252, accessed May 10, 2018.

[23] US Environmental Protection Agency, 2009, EPA: Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, https://www.epa.gov/ghgemissions/endangerment-and-cause-or-contribute-findings-greenhouse-gases-under-section-202a-clean, accessed December 5, 2018.

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 President Obama's 2013 Climate Action Plan, the EPA was directed to also develop regulations for existing stationary sources. However, the EPA is reviewing the Clean Power Plan under President Trump's Energy Independence Executive Order.

State Regulations

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in Executive Order S-03-05, Assembly Bill (AB) 32, Senate Bill (SB) 32, Executive Order B-30-15, and SB 375.

Executive Order S-03-05

Executive Order S-03-05, signed June 1, 2005, set the following GHG reduction targets for the state:

- 2000 levels by 2010.
- 1990 levels by 2020.
- 80 percent below 1990 levels by 2050.

Assembly Bill 32

Also known as the Global Warming Solutions Act (2006), AB 32 was signed August 31, 2006, in order to reduce California's contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in Executive Order S-03-05. Under AB 32, California Air Resources Board (CARB) prepared the *2008 Climate Change Scoping Plan*, the *2014 Climate Change Scoping Plan,* and the *2017 Climate Change Scoping Plan,* which are discussed below.

CARB 2008 Scoping Plan

The final Scoping Plan was adopted by CARB on December 11, 2008. The 2008 Scoping Plan identified that GHG emissions in California are anticipated to be approximately 596 $MMTCO_2e$ in 2020. In December 2007, CARB approved a 2020 emissions limit of 427 $MMTCO_2e$ (471 million tons) for the state. 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 plan by 2012.

First Update to the Scoping Plan

CARB completed a five-year update to the 2008 Scoping Plan, as required by AB 32. The First Update to the Scoping Plan, adopted at the May 22, 2014, board hearing, highlights California's progress toward meeting the near-term 2020 GHG emission reduction goals defined in the 2008 Scoping Plan. As part of the update, CARB recalculated the 1990 GHG emission levels with the updated AR4 GWPs, and the

427 $MMTCO_2e$ 1990 emissions level and 2020 GHG emissions limit, established in response to AB 32, are slightly higher at 431 $MMTCO_2e$.[24]

As identified in the Update to the Scoping Plan, California is on track to meeting the goals of AB 32. However, the update also addresses the state's longer-term GHG goals in 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 midterm 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.[25] CARB identified that 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 from 2020 to 2050 will have to decline several times faster than the rate needed to reach the 2020 emissions limit.[26]

Executive Order B-30-15

Executive Order B-30-15, signed April 29, 2015, sets a goal of reducing GHG emissions within the state to 40 percent of 1990 levels by year 2030. Executive Order B-30-15 also directs CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in Executive Order S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaption strategy, Safeguarding California, in order to ensure climate change is accounted for in state planning and investment decisions.

Senate Bill 32 and Assembly Bill 197

In September 2016, Governor Brown signed SB 32 and AB 197 into law, making the Executive Order goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires the CARB to prioritize direct emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

Executive Order B-30-15 and SB 32 required CARB to prepare another update to the Scoping Plan to address the 2030 target for the state. On December 14, 2017, CARB adopted the 2017 Climate Change Scoping Plan Update to address the 2030 target for the state. The 2017 Scoping Plan establishes a new

[24] California Air Resources Board, 2014, First Update to the Climate Change Scoping Plan: Building on the Framework, Pursuant to AB 32, The California Global Warming Solutions Act of 2006. http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm, accessed December 5, 2018.

[25] California Air Resources Board, 2014, First Update to the Climate Change Scoping Plan: Building on the Framework, Pursuant to AB 32, The California Global Warming Solutions Act of 2006. http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm, accessed December 5, 2018.

[26] California Air Resources Board, 2014, First Update to the Climate Change Scoping Plan: Building on the Framework, Pursuant to AB 32, The California Global Warming Solutions Act of 2006. http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm, accessed December 5, 2018.

emissions limit of 260 $MMTCO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030.[27]

California's climate strategy will require contributions from all sectors of the economy, including enhanced focus on zero- and near-zero emission (ZE/NZE) vehicle technologies; continued investment in renewables, such as solar roofs, wind, and other types of distributed generation; greater use of low carbon fuels; integrated land conservation and development strategies; coordinated efforts to reduce emissions of short-lived climate pollutants (i.e., methane, black carbon, and fluorinated gases); and an increased focus on integrated land use planning to support livable, transit-connected communities and conservation of agricultural and other lands. Requirements for GHG reductions at stationary sources complement local air pollution control efforts by the local air districts to tighten criteria air pollutants and toxic air contaminants (TACs) emissions limits on a broad spectrum of industrial sources. Major elements of the 2017 Scoping Plan framework include:

- Implementing and/or increasing the standards of the Mobile Source Strategy, which include increasing zero emission vehicle buses and trucks.
- Low Carbon Fuel Standard, with an increased stringency (18 percent by 2030).
- Implementation of SB 350, which expands the Renewables Portfolio Standard (RPS) to 50 percent RPS and doubles energy efficiency savings by 2030.
- California Sustainable Freight Action Plan, which improves freight system efficiency, utilizes near-zero emissions technology, and deployment of zero emission vehicle trucks.
- Implementing the proposed Short-Lived Climate Pollutant Strategy, which focuses on reducing methane and hydrofluorocarbon emissions by 40 percent and anthropogenic black carbon emissions by 50 percent by year 2030.
- Continued implementation of SB 375.
- Post-2020 Cap-and-Trade Program that includes declining caps.
- Development of a Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

In addition to the statewide strategies listed above, the 2017 Scoping Plan also identified local governments as essential partners in achieving the State's long-term GHG reduction goals and identified local actions to reduce GHG emissions. As part of the recommended actions, CARB recommends statewide targets of no more than 6 $MTCO_2e$ or less per capita by 2030 and 2 $MTCO_2e$ or less per capita by 2050. CARB recommends that local governments evaluate and adopt robust and quantitative locally-appropriate goals that align with the statewide per capita targets and the State's sustainable development objectives and develop plans to achieve the local goals. The statewide per capita goals were developed by applying the percent reductions necessary to reach the 2030 and 2050 climate goals (i.e., 40 percent and 80 percent, respectively) to the State's 1990 emissions limit established under AB 32. For California Environmental Quality Act (CEQA) projects, CARB states that lead agencies have the discretion to develop

[27] California Air Resources Board, 2017, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf, accessed May 10, 2018.

evidenced-based numeric thresholds (mass emissions, per capita, or per service population)—consistent with the Scoping Plan and the State's long-term GHG goals. To the degree a project relies on GHG mitigation measures, CARB recommends that lead agencies prioritize on-site design features that reduce emissions, especially from vehicle miles travelled (VMT), and direct investments in GHG reductions within the project's region that contribute potential air quality, health, and economic co-benefits. Where further project design or regional investments are infeasible or not proven to be effective, CARB recommends mitigating potential GHG impacts through purchasing and retiring carbon credits.

The Scoping Plan scenario is set against what is called the business-as-usual (BAU) yardstick—that is, what the GHG emissions would look like if the State did nothing at all beyond the existing policies that are required and already in place to achieve the 2020 limit, as shown in Table 4.6-3. It includes the existing renewables requirements, advanced clean cars, the "10 percent" Low Carbon Fuel Standard, and the SB 375 program for more vibrant communities, among others. However, it does not include a range of new policies or measures that have been developed or put into statute over the past 2 years. Also shown in the table, the known commitments are expected to result in emissions that are 60 $MMTCO_2e$ above the target in 2030. If the estimated GHG reductions from the known commitments are not realized due to delays in implementation or technology deployment, the post-2020 Cap-and-Trade Program would deliver the additional GHG reductions in the sectors it covers to ensure the 2030 target is achieved.

TABLE 4.6-3 2017 CLIMATE CHANGE SCOPING PLAN EMISSIONS REDUCTIONS GAP TO ACHIEVE THE 2030 GHG TARGET

Modeling Scenario	2030 GHG Emissions $MMTCO_2e$
Reference Scenario (Business-as-Usual)	389
With Known Commitments	320
2030 GHG Target	**260**
Gap to 2030 Target with Known Commitments	**60**

Source: California Air Resources Board, 2017. California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf, accessed on August 28, 2018.

Table 4.6-4 provides estimated GHG emissions by sector, compared to 1990 levels, and the range of GHG emissions for each sector estimated for 2030.

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 (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to 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. Pursuant to the recommendations of

TABLE 4.6-4 2017 CLIMATE CHANGE SCOPING PLAN EMISSIONS BY SECTOR TO ACHIEVE THE 2030 GHG TARGET

Scoping Plan Sector	1990 $MMTCO_2e$	2030 Proposed Plan Ranges $MMTCO_2e$	% Change from 1990
Agricultural	26	24-25	-8% to -4%
Residential and Commercial	44	38-40	-14% to -9%
Electric Power	108	30-53	-72% to -51%
High GWP	3	8-11	267% to 367%
Industrial	98	83-90	-15% to -8%
Recycling and Waste	7	8-9	14% to 29%
Transportation (including TCU)	152	103-111	-32% to -27%
Net Sink[a]	-7	TBD	TBD
Sub Total	431	294-339	-32% to -21%
Cap-and-Trade Program	NA	24-79	NA
Total	431	260	-40%

Notes: TCU = Transportation, Communications, and Utilities; TBD = To Be Determined.
a. Work is underway through 2017 to estimate the range of potential sequestration benefits from the natural and working lands sector.
Source: California Air Resources Board. 2017, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf, accessed August 28, 2018.

the Regional Transportation Advisory Committee (RTAC), CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target.

CARB is required to update the targets for the MPOs every eight years. CARB adopted revised SB 375 targets for the MPOs in March 2018.[28] The updated targets become effective on October 1, 2018. The targets consider the need to further reduce VMT, as identified in the 2017 Scoping Plan Update (for SB 32), while balancing the need for additional and more flexible revenue sources to incentivize positive planning and action toward sustainable communities. Like the 2010 targets, the updated SB 375 targets are in units of percent per capita reduction in GHG emissions from automobiles and light trucks relative to 2005; this excludes reductions anticipated from implementation of state technology and fuels strategies, and any potential future state strategies, such as statewide road user pricing.

The proposed targets call for greater per-capita GHG emission reductions from SB 375 than are currently in place, which for 2035 translate into proposed targets that either match or exceed the emission reduction levels in the MPOs' currently adopted SCS to achieve the SB 375 targets. For next SCS update, CARB's updated targets for the MTC/ABAG region are a 10 percent per capita GHG reduction in 2020 from 2005 levels (compared to 7 percent under the 2010 target) and a 19 percent per capita GHG reduction in

[28]California Air Resources Board, 2018, Updated Final Staff Report: Proposed Update to the SB 375 Greenhouse Gas Emissions Reduction Targets, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets, accessed November 20, 2018.

2035 from 2005 levels (compared to the 2010 target of 15 percent). CARB foresees that the additional GHG emissions reductions in 2035 may be achieved from land use changes, transportation investment, and technology strategies.[29]

Other Regulations

Senate Bill 1383

On September 19, 2016, the Governor signed SB 1383 to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and CH_4. Black carbon is the light-absorbing component of fine particulate matter produced during incomplete combustion of fuels. SB 1383 requires the State board, no later than January 1, 2018, to approve and begin implementing that comprehensive strategy to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The bill also establishes targets for reducing organic waste in landfills. On March 14, 2017, CARB adopted the "Final Proposed Short-Lived Climate Pollutant Strategy," which identifies the State's approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s, despite the tripling of diesel fuel use.[30] In-use on-road rules are expected to reduce black carbon emissions from on-road sources by 80 percent between 2000 and 2020.

Assembly Bill 1493

Also known as Pavley I, AB 1493 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 in 2016. 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 the heading for Federal Regulations, 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.[31]

[29] California Air Resources Board, 2018, Updated Final Staff Report: Proposed Update to the SB 375 Greenhouse Gas Emissions Reduction Targets, https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets, accessed November 20, 2018.

[30] California Air Resources Board, 2017, Short-Lived Climate Pollutant Reduction Strategy, https://www.arb.ca.gov/cc/shortlived/meetings/03142017/final_slcp_report.pdf, accessed May 10, 2018.

[31] 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

Executive Order S-01-07

On January 18, 2007, the state set a new Low Carbon Fuel Standard for transportation fuels sold in California. 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 Low Carbon Fuel Standard 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 Low Carbon Fuel 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

Signed on March 23, 2012, the State directed that CARB, the California Energy Commission, 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 by 2020. Finally, the executive order sets a target of reducing GHG emissions from the transportation sector 80 percent below 1990 levels.

Senate Bills 1078, 107, and X1-2, and Executive Order S-14-08

A major component of California's Renewable Energy Program is the renewable portfolio standard established under Senate Bill 1078 and 107. Executive Order S-14-08 was signed in November 2008, which expanded the State's Renewable Energy Standard to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). 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.

Senate Bill 350

Signed in September 2015, SB 350 establishes tiered increases to the renewable portfolio standard of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 seeks to double the energy efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

Executive Order B-55-18 and SB 100

SB 100 and Executive Order B-55-18 were signed by Governor Brown on September 10, 2018. Under the existing RPS, 25 percent of retail sales are required to be from renewable sources by December 31, 2016, 33 percent by December 31, 2020, 40 percent by December 31, 2024, 45 percent by December 31, 2027,

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.

and 50 percent by December 31, 2030. SB 100 raises California's RPS requirement to 50 percent renewable resources target by December 31, 2026, and to achieve a 60 percent target by December 31, 2030. SB 100 also requires that retail sellers and local publicly owned electric utilities procure a minimum quantity of electricity products from eligible renewable energy resources so that the total kilowatt hours of those products sold to their retail end-use customers achieve 44 percent of retail sales by December 31, 2024, 52 percent by December 31, 2027, and 60 percent by December 31, 2030.

In addition to targets under AB 32 and SB32, Executive Order B-55-18 establishes a carbon neutrality goal for the state of California by 2045; and sets a goal to maintain net negative emissions thereafter. The Executive Order directs the California Natural Resources Agency, CalEPA, the Department of Food ang Agriculture, and CARB to include sequestration targets in the Natural and Working Lands Climate Change Implementation Plan consistent with the carbon neutrality goal.

California Building Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and non-residential buildings were adopted in June 1977 and most recently revised in 2016 (Title 24, Part 6, of the California Code of Regulations). 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 June 10, 2015, the California Energy Commission adopted the 2016 Building Energy Efficiency Standards, which went into effect on January 1, 2017. The 2016 Building Energy Efficiency Standards continues to improve upon the previous 2013 Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. Under the 2016 Standards, residential and nonresidential buildings are 28 and 5 percent more energy efficient than the 2013 Standards, respectively.[32] While the 2016 standards do not achieve zero net energy, they do get very close to the State's goal and make important steps toward changing residential building practices in California. The 2019 Building Energy Efficiency Standards, which were adopted on May 9, 2018, go into effect starting January 1, 2020.[33] New building permit applications, submitted after January 1, 2020, will be subject to the new energy efficiency standards.

The 2019 standards move toward cutting energy use in new homes by more than 50 percent and will require installation of solar photovoltaic systems for single-family homes and multifamily buildings of three stories and less. Four key areas the 2019 standards will focus on are 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; and 4) nonresidential lighting requirements.[34] Under the 2019 standards, nonresidential buildings will be 30

[32] California Energy Commission, 2015, 2016 Building Energy Efficiency Standards, Adoption Hearing Presentation, http://www.energy.ca.gov/title24/2016standards/rulemaking/documents/2015-06-10_hearing/2015-06-10_Adoption_Hearing_Presentation.pdf /, accessed May 10, 2018.

[33] California Energy Commission, 2015, 2016 Building Energy and Efficiency Standards Frequently Asked Questions, http://www.energy.ca.gov/title24/2016standards/rulemaking/documents/2016_Building_Energy_Efficiency_Standards_FAQ.pdf, accessed May 10, 2018.

[34] California Energy Commission ,2018, Energy Commission Adopts Standards Requiring Solar Systems for New Homes, First in Nation, News Release, http://www.energy.ca.gov/releases/2018_releases/2018-05-09_building_standards_adopted_nr.html.

percent more energy efficient compared to the 2016 standards, and single-family homes will be 7 percent more energy efficient. When accounting for the electricity generated by the solar photovoltaic system, single-family homes would use 53 percent less energy than homes built to the 2016 standards.[35]

California Building Code: CALGreen

On July 17, 2008, California Green Building Standards Code (24 California Code of Regulations, Part 11, known as "CALGreen") were adopted as part of the California Building Standards Code. 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.[36] The mandatory provisions of the 2016 CalGreen building standards became effective on January 1, 2017. The CEC adopted the 2019 CALGreen on May 9, 2018, and it becomes effective January 1, 2020.

2006 Appliance Efficiency Regulations

Adopted by the California Energy Commission on October 11, 2006, the 2006 Appliance Efficiency Regulations (Title 20, California Code of Regulations, Sections 1601 through 1608) were 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.

Solid Waste Regulations

California's Integrated Waste Management Act of 1989 (AB 939, Public Resources Code 40050 *et seq.*) 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. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the act requires that each city and county 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. AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multifamily residential land uses.

The California Solid Waste Reuse and Recycling Access Act (AB 1327, California Public Resources Code Sections 42900 *et seq.*) requires areas to be set aside for collecting and loading recyclable materials in development projects. The act required the California Integrated Waste Management Board to develop a model ordinance for adoption by any local agency requiring 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. Section 5.408 of the CalGreen also requires that at least 50 percent of the

[35] California Energy Commission, 2018, 2019 Building Energy and Efficiency Standards Frequently Asked Questions. http://www.energy.ca.gov/title24/2019standards/documents/2018_Title_24_2019_Building_Standards_FAQ.pdf.

[36] The green building standards became mandatory in the 2010 edition of the code.

nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

AB 1826, signed on October of 2014, requires businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste.

Water Efficiency Regulations

The 20x2020 Water Conservation Plan was issued by the Department of Water Resources (DWR) in 2010 pursuant to Senate Bill 7, which was adopted during the 7th Extraordinary Session of 2009 to 2010 and therefore dubbed "SBX7-7." SBX7-7 mandated urban water conservation and authorized the DWR to prepare a plan implementing urban water conservation requirements (20x2020 Water Conservation Plan). In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 requires urban water providers to adopt a water conservation target of 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or equivalent. AB 1881 also requires the Energy Commission, in consultation with the department, to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

Regional Plans and Regulations

Plan Bay Area 2040

Plan Bay Area 2040 is the Bay Area's RTP/SCS and was adopted jointly by ABAG and MTC on July 26, 2017. It 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. Plan Bay Area 2040 is a limited and focused update to the 2013 Plan Bay Area, with updated planning assumptions that incorporate key economic, demographic, and financial trends from the last several years. 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 in PDAs. Per the Plan Bay Area 2040, while the projected number of new housing units and new jobs within PDAs would increase to 629,000 units and 707,000 jobs compared to the Plan Bay Area 2013,

its overall share would be reduced to 77 percent and 55 percent.[37] However, Plan Bay Area 2040 remains on track to meet a 16 percent per capita reduction of GHG emissions by 2035 and a 10 percent per capita reduction by 2020 from 2005 conditions.[38] The project is not within an identified PDA.[39] However, the site is within a transit priority area (TPA) as it is within one-half mile of VTA routes 37 and 48, both of which are considered major bus routes. A TPA is an area within one-half mile of an existing or planned major transit stop such as a rail transit station, a ferry terminal served by transit, or the intersection of two or more major bus routes.

Bay Area Clean Air Plan

The Air District adopted the 2017 *Clean Air Plan, Spare the Air, Cool the Climate* on April 19, 2017. The 2017 Clean Air Plan also lays the groundwork for reducing greenhouse gas (GHG) emissions in the Bay Area to meet the state's 2030 GHG reduction target and 2050 GHG reduction goal. It also includes a vision for the Bay Area in a post-carbon year 2050 that encompasses the following:

- Construct buildings that are energy efficient and powered by renewable energy.
- Walk, bicycle, and use public transit for the majority of trips and use electric-powered autonomous public transit fleets.
- Incubate and produce clean energy technologies.
- Live a low-carbon lifestyle by purchasing low-carbon foods and goods in addition to recycling and putting organic waste to productive use.[40]

A comprehensive multipollutant control strategy has been developed to be implemented in the next 3 to 5 years to address public health and climate change and to set a pathway to achieve the 2050 vision. The control strategy includes 85 control measures to reduce emissions of ozone, particulate matter, toxic air contaminants, and GHG from a full range of emission sources. These control measures cover the following sectors: 1) stationary (industrial) sources; 2) transportation; 3) energy; 4) agriculture; 5) natural and working lands; 6) waste management; 7) water; and 8) super-GHG pollutants. Overall, the proposed control strategy is based on the following key priorities:

- Reduce emissions of criteria air pollutants and toxic air contaminants from all key sources.
- Reduce emissions of "super-GHGs" such as methane, black carbon, and fluorinated gases.
- Decrease demand for fossil fuels (gasoline, diesel, and natural gas).
- Increase efficiency of the energy and transportation systems.
- Reduce demand for vehicle travel, and high-carbon goods and services.
- Decarbonize the energy system.
- Make the electricity supply carbon-free.
- Electrify the transportation and building sectors.

[37] Metropolitan Transportation Commission and Association of Bay Area Governments, 2017, Plan Bay Area 2040 Plan.

[38] Metropolitan Transportation Commission and Association of Bay Area Governments, 2017, Plan Bay Area 2040 Plan.

[39] Association of Bay Area Governments, Priority Development Area (PDA) and Transit Priority Area (TPA) Map for CEQA Streamlining, https://www.planbayarea.org/pda-tpa-map /, accessed November 21, 2018.

[40] Bay Area Air Quality Management District, 2017, Final 2017 Clean Air Plan, Spare the Air, Cool the Climate: A Blueprint for Clean Air and Climate Protection in the Bay Area, http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans, accessed July 18, 2018.

Bay Area Commuter Benefits Program

Under Air District Regulation 14, Model Source Emissions Reduction Measures, Rule 1, Bay Area Commuter Benefits Program, employers with 50 or more full-time employees within the Air District are required to register and offer commuter benefits to employees. In partnership with the Air District and the Metropolitan Transportation Commission (MTC), the rule's purpose is to improve air quality, reduce greenhouse gas emissions, and decrease the Bay Area's traffic congestion by encouraging employees to use alternative commute modes, such as transit, vanpool, carpool, bicycling, and walking. The benefits program allows employees to choose from one of four commuter benefit options including a pre-tax benefit, employer-provided subsidy, employer-provided transit, and alternative commute benefit.

Local Plans and Regulations

Table 4.6-5 shows the relevant Campbell General Plan policies related to GHG emissions.

TABLE 4.6-5 CITY OF CAMPBELL GENERAL PLAN POLICIES PERTAINING TO GHGS

Policy Number	Policy 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.

TABLE 4.6-5 CITY OF CAMPBELL GENERAL PLAN POLICIES PERTAINING TO GHGS

Policy Number	Policy Text
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, 2011, General Plan.

4.6.1.3 EXISTING CONDITIONS

The proposed project consists of an existing office building and parking lot that generates GHG emissions from transportation sources (passenger vehicles, trucks), energy (natural gas and purchased energy), water use and wastewater generation, and solid waste generation. Existing emissions are shown in Table 4.6-6.

TABLE 4.6-6 EXISTING GHG EMISSIONS

	GHG Emissions ($MTCO_2e$/Year)	
	Existing	Percent
Area	<1	<1%
Energy	107	36%
On-Road Mobile Sources	175	59%
Waste	13	4%
Water/Wastewater	<1	<1%
TOTAL	**295**	**100%**

Note: Emissions may not total to 100 percent due to rounding. The existing building was constructed prior to the 2005 Building and Energy Efficiency Standards; and therefore, the "historic" rate in CalEEMod was used to estimate existing building energy use. Emissions reflect the existing building as one third occupied.
Source: CalEEMod 2016.3.2.

4.6.2 IMPACT DISCUSSION

4.6.2.1 STANDARDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in Section 4.6.2.2 uses the following standards of significance. The proposed project would result in a significant impact if it would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may a significant effect on the environment.
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The Air District has adopted CEQA Guidelines to evaluate GHG emissions impacts from development project.[41] 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 nonbiogenic 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.

The Air District has a tiered approach for assessing GHG emissions impacts of a project:

1. Consistency with a Qualified GHG Reduction Strategy. [42] If a project is within the jurisdiction of an agency that has a "qualified" GHG reduction strategy that is consistent with AB 32 goals, the project can assess consistency of its GHG emissions impacts with the reduction strategy.

2. Air District Screening Level Sizes. The Air District has adopted screening criteria for development projects that would be applicable for the proposed project based on the square footage, units, acreage, students, and/or employees generated by a project. Typical projects that meet the screening criteria do not generate emissions greater than 1,100 $MTCO_2e$ and would not generate significant GHG emissions.

3. Brightline Screening Threshold. The Air District has adopted screening criteria for development projects of 1,100 $MTCO_2e$ per year that would be applicable for the proposed project. If a project exceeds the Air District Guidelines' GHG screening-level sizes or screening criteria of 1,100 $MTCO_2e$, the project would be required to conduct a full GHG analysis using based on GHG reduction goals of AB 32 and SB 32.

4. Efficiency Threshold:

- AB 32 Goal: 2020. AB 32 requires the statewide GHG emission to be reduced to 1990 levels by 2020. On a per-capita basis, that means reducing the annual emissions of 14 tons of carbon dioxide for every man, woman, and child in California down to about 10 tons per person by 2020.[43] Hence, the Air District's per capita significance threshold is calculated based on the state's land use sector emissions inventory prepared by CARB and the demographic forecasts for the 2008 Scoping Plan. The land use sector GHG emissions for 1990 were estimated by the Air District, as identified in Appendix D of the Air District CEQA Guidelines, to be 295.53 $MMTCO_2e$ and the 2020 California service population

[41] Bay Area Air Quality Management Agency, 2017, California Environmental Quality Act Air Quality Guidelines, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed November 21, 2018.

[42] Bay Area Air Quality Management Agency, 2017, California Environmental Quality Act Air Quality Guidelines, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed November 20, 2018.

[43] California Air Resources Board,2008, Climate Change Proposed Scoping Plan, a Framework for Change.

(SP) to be 64.3 million. Therefore, the significance threshold that would ensure consistency with the GHG reduction goals of AB 32 is estimated at 4.6 $MTCO_2e$/SP for year 2020.[44]

- SB 32 Goal: 2030. Executive Order B-30-15, signed April 29, 2015, sets a goal of reducing GHG emissions within the state to 40 percent of 1990 levels by year 2030. Executive Order B-30-15 also directs CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal. In September 2016, Governor Brown signed SB 32 into law, making the Executive Order goal for year 2030 into a statewide mandated legislative target.

  Using a similar methodology as developed by the Air District, the efficiency targets have been adjusted based on the GHG reduction targets of SB 32, which set a goal of 40 percent below 1990 levels by 2030. Table 4.6-7 shows the 2030 efficiency target using the latest land use emissions inventory developed for the 2017 Scoping Plan. Executive Order B-30-15 and SB 32 required CARB to prepare another update to the Scoping Plan to address the 2030 target for the state. On December 14, 2017, CARB adopted the 2017 Climate Change Scoping Plan Update. The 2017 Climate Change Scoping Plan Update includes the regulations and programs to achieve the 2030 target. The 2017 Scoping Plan establishes a new emissions "project level" limit of 190.7 $MMTCO_2e$ for the year 2030, which corresponds to a 40 percent decrease in 1990 levels by 2030 for the land-use based sectors.[45] Therefore, the significance threshold that would ensure consistency with the GHG reduction goals of SB 32 is estimated at 3.2 $MTCO_2e$/SP for year 2030, as shown in Table 4.6-7.

TABLE 4.6-7 2030 GHG REDUCTION TARGETS

GHG Sector[a]	Scoping Plan Scenario GHG Emissions ($MMTCO_2e$)
2017 Scoping Plan End Use Sector 2030 – Land Use Sector Only	
Residential – residential energy consumption	41.4
Commercial – commercial energy consumption	30.1
Transportation – transportation energy consumption	105.1
Transportation Communications and Utilities – energy that supports public infrastructure like street lighting and waste treatment facilities	5
Solid Waste Non-Energy GHGs	9.1
Total 2017 Scoping Plan Land Use Sector Target	190.7

[44] Bay Area Air Quality Management Agency, 2017, California Environmental Quality Act Air Quality Guidelines, http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en, accessed November 20, 2018.

[45] California Air Resources Board, 2017, California's 2017 Climate Change Scoping Plan: The Strategy for Achieving California's 2030 Greenhouse Gas Target, https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf, accessed November 20, 2018.

TABLE 4.6-7 2030 GHG REDUCTION TARGETS

GHG Sector[a]	Scoping Plan Scenario GHG Emissions ($MMTCO_2e$)
2030 Project-Level Efficiency Target	
2030 Population[b]	43,939,250
2030 Employment[c]	16,454,761
2030 Service Population (SP)	60,394,011
2030 Efficiency Target	3.2 $MTCO_2e$/SP/yr

Sources:
a. California Air Resources Board, 2017, Draft – The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target, https://www.arb.ca.gov/cc/scopingplan/revised2017spu.pdf, accessed October 22, 2018.
b. California Department of Finance, 2018, March 8. Report P-1 (County): State and County Total Population Projections, 2010-2060 (1 -year increments), http://www.dof.ca.gov/Forecasting/Demographics/Projections/, accessed October 22, 2018.
c. California Department of Transportation, 2017, Long-Term Socio-Economic Forecasts by County. http://www.dot.ca.gov/hq/tpp/offices/eab/socio_economic.html, accessed October 22, 2018.

4.6.2.2 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance as identified in Section 4.6.2.1 above. This air quality and GHG emissions evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur in conjunction with the type and scale of development associated with the proposed project. GHG emissions modeling was completed in March 2019 for the project using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2, as recommended by the Air District. GHG modeling datasheets are in Appendix B of this Draft EIR. Life-cycle emissions are not included in this analysis because business operation or sources of operation materials are available for the proposed project. Therefore, life-cycle GHG emissions would be speculative.[46] Additionally, black carbon emissions are not included in the GHG analysis because CARB does not include this pollutant in the State's AB 32 inventory and treats this short-lived climate pollutant separately.[47]

[46] Life-cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction phases of individual development projects is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (Governor's Office of Planning and Research, 2008, CEQA and Climate Change: Addressing Climate Change through CEQA Review. Technical Advisory).

[47] Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (California Air Resources Board, 2017, Final Proposed Short-Lived Climate Pollutant Reduction Strategy, https://www.arb.ca.gov/cc/shortlived/shortlived.htm, accessed November 27, 2018).

GHG-1 The proposed project would not directly or indirectly generate greenhouse gas emissions that would result in an increase in community emissions from baseline conditions that would have a significant impact on the environment.

Development under the proposed project would contribute to global climate change through direct and indirect GHG emissions from transportation sources, energy (natural gas and purchased energy), water use and wastewater generation, waste generation, and other, off-road equipment (e.g., landscape equipment, construction activities). The following is a discussion of the project's contribution to GHG emissions during both the construction and operation phases.

Construction

The Air District does not have thresholds of significance for construction-related GHG emissions, which are one-time, short-term emissions and therefore would not significantly contribute to the long-term cumulative GHG emissions impacts of the proposed project. One-time, short-term emissions are converted to average annual emissions by amortizing them over the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame, since this is a typical interval before a new building requires the first major renovation.[48] The net increase in emissions generated by the proposed project was evaluated using CalEEMod, Version 2016.3.2. Construction was conservatively assumed to take place over 22 months beginning in January 2020.

As shown in Table 4.6-8, when evaluated over an average 30-year project lifetime, average annual construction emissions from the proposed project would represent a nominal source of GHG emissions and would not exceed the Air District's *de minimis* bright-line threshold of 1,100 $MTCO_2e$/year. Accordingly, construction GHG emissions from the proposed project would be *less than significant* and no mitigation measures are required.

TABLE 4.6-8 GHG EMISSIONS – CONSTRUCTION PHASE

Category	GHG Emissions ($MTCO_2e$/Year)
2020	285
2021	155
Total Construction Emissions (Years 2020 to 2021)	**440**
30-Year Project Life Construction[a]	**15**

Note: Emissions may not total to 100 percent due to rounding.
a. The construction evaluation is amortized over the 30-year estimated life of the proposed project.
Source: CalEEMod 2016.3.2.

Operation

The total and net increase of GHG emissions that are associated with the proposed project are shown in Table 4.6-9. As shown in this table, development of the proposed project would result in a net increase of GHG emissions of 1,077 $MTCO_2e$ per year. The increase in GHG emissions would not exceed the Air District's bright-line screening threshold of 1,100 $MTCO_2e$. Therefore, project-related GHG emissions during the operational phase of the proposed project would be *less than significant* and no mitigation measures are required.

[48] International Energy Agency, 2008, Energy Efficiency Requirements in Building Codes, Energy Efficiency Policies for New Buildings.

TABLE 4.6-9 PROJECT GHG EMISSIONS – OPERATIONAL PHASE

	GHG Emissions (MTCO2e/Year)		
	Existing	Proposed Project	Net Change
Area	<1	<1	<1
Energy	107	203	96
On-Road Mobile Sources	175	1,052	877
Waste	13	89	77
Water/Wastewater[a]	3	15	12
Amortized Construction	—	15	15
TOTAL	**297**	**1,374**	**1,077**
Air District Bright-Line Threshold	—	—	1,100 $MTCO_2e$/ Year
Exceeds Bright-Line Threshold?	**NA**	**NA**	**No**

Notes: Emissions may not total to 100 percent due to rounding. NA = not applicable. Conservatively assumes buildings would be constructed to the 2016 Building Energy Efficiency Standards (effective January 1, 2017). Existing buildings were constructed prior to the 2005 Building and Energy Efficiency Standards; and therefore, the "historic" rate in CalEEMod was used to estimate existing building energy use. Transportation emissions include transportation demand management measures, such as the trip reduction program, required under the Bay Area Commuter Benefits Program.
a. Water usage is based on a conservative estimate by 4 percent.
Source: CalEEMod 2016.3.2.

Significance without Mitigation: Less than significant.

GHG-2 The proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

The following discusses project consistency with applicable plans adopted for the purpose of reducing GHG emissions, which include CARB's Scoping Plan and MTC/ABAG's *Plan Bay Area 2040*.

CARB Scoping Plan

In accordance with AB 32, CARB developed the 2008 Scoping Plan to outline the State's strategy established by AB 32, which is to return the State's GHG emissions inventory to 1990 levels by year 2020. In September 2016, SB 32 was signed into law, requiring the State's GHG emissions to return to 40 percent below 1990 levels by 2030. Executive Order B-30-15 and SB 32 required CARB to prepare another update to the Scoping Plan to address the 2030 target for the State. In December 2017, CARB adopted the 2017 Scoping Plan Update to address the new interim GHG emissions target under SB 32. The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. Nonetheless, the Scoping Plan has been the primary tool that is used to develop performance-based and efficiency-based CEQA criteria and GHG reduction targets for climate action planning efforts.

Statewide strategies to reduce GHG emissions in the 2017 Climate Change Scoping Plan include: implementing SB 350, which expands the RPS to 50 percent by 2030 and doubles energy efficiency

savings; expanding the Low Carbon Fuel Standards (LCFS) to 18 percent by 2030; implementing the Mobile Source Strategy to deploy zero-electric vehicle buses and trucks; implementing the Sustainable Freight Action Plan; implementing the Short-Lived Climate Pollutant Reduction Strategy, which reduces methane and hydrofluorocarbons to 40 percent below 2013 levels by 2030 and black carbon emissions to 50 percent below 2013 levels by 2030; continuing to implement SB 375; creating a post-2020 Cap-and-Trade Program; and developing an Integrated Natural and Working Lands Action Plan to secure California's land base as a net carbon sink.

The project's GHG emissions, shown in Tables 4.6-8 and 4.6-9 under impact discussion GHG-1, include reductions associated with statewide strategies that have been adopted since AB 32. Statewide strategies to reduce GHG emissions include the low carbon fuel standards, California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the CAFE standards, and other early action measures as necessary to ensure the State is on target to achieve the GHG emissions reduction goals of AB 32 and SB 32. In addition, new buildings are required to comply with the current Building Energy Efficiency Standards and CALGreen. The proposed project would comply with these GHG emissions reduction measures since they are statewide strategies. The project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32 and SB 32 were adopted. Therefore, impacts would be *less than significant*.

Plan Bay Area

As discussed, as part of the implementing framework for *Plan Bay Area 2040*, local governments have identified PDAs to focus growth. While the project site is not within a PDA, it is within a TPA. Thus the proposed project would encourage the efficient use of land through sustainable development patterns, a mixture of uses, and development intensities that support transit and walking between places of employment near residences. [49] Furthermore, the proposed project would be consistent with the overall goals of *Plan Bay Area 2040* in concentrating new development in locations where there is existing infrastructure as the proposed project would redevelop an existing developed property within the City. Therefore, the proposed project would not conflict with the land use concept plan in *Plan Bay Area 2040* and impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

4.6.3 CUMULATIVE IMPACTS

Project-related GHG emissions are not confined to a particular air basin, but are dispersed worldwide. Therefore, impacts under Impact GHG-1 are not project-specific impacts to global warming, but the project's contribution to this cumulative impact. As discussed under Impact GHG-1, development and operation of the proposed project would not exceed the Air District's screening threshold of 1,100 $MTCO_2e$. Thus, project-related GHG emissions and their contribution to global climate change are not cumulatively considerable.

[49] Association of Bay Area Governments, Priority Development Area (PDA) and Transit Priority Area (TPA) Map for CEQA Streamlining, https://www.planbayarea.org/pda-tpa-map/, accessed November 21, 2018.

4.7 HAZARDS AND HAZARDOUS MATERIALS

This chapter describes the regulatory framework and existing conditions on the project site related to hazards and hazardous materials, and an evaluation of the potential environmental consequences associated with the construction and operation of the proposed project that are related to the release of hazardous materials into the environment. The analysis in this section is based, in part, upon the following document: Applied Water Resources, January 19, 2016, *Phase I Environmental Site Assessment (ESA) Report, 1690-1700 Dell Avenue, Campbell, California*.

A complete copy of this document is included in Appendix F to this Draft EIR.

4.7.1 ENVIRONMENTAL SETTING

4.7.1.1 REGULATORY FRAMEWORK

Federal

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 Resource Conservation and Recovery Act, 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. The Department of Toxic Substances Control (DTSC) is responsible for implementing the Resource Conservation and Recovery Act 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, the California Environmental Protection Agency (CalEPA) has in turn delegated enforcement authority to the County of Santa Clara for State law regulating hazardous waste producers or generators in Campbell. A 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.

Emergency Planning Community Right-to-Know Act

The Emergency Planning Community Right-to-Know Act, also known as Title III of the Superfund Amendments and Reauthorization Act, 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 communities. Emergency Planning Community Right-to-Know Act Sections 301 through 312 are administered by United States Environmental Protection Agency's (EPA) Office of Emergency

Management. The EPA's Office of Information Analysis and Access implements the Emergency Planning Community Right-to-Know Act Section 313 program. In California, Superfund Amendments and Reauthorization Act Title III is implemented through California Accidental Release Prevention program. The State of California has delegated local oversight authority of the California Accidental Release Prevention program to the County of Santa Clara.

Hazardous Materials Transportation Act

The United States Department of Transportation regulates hazardous materials transportation under Title 49 of the Code of Federal Regulations. State agencies that have primary responsibility for enforcing federal and State regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol and the California Department of Transportation. 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 June 2016.

Robert T. Stafford Disaster Relief and Emergency Assistance Act

The Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1988 authorizes the federal government to provide assistance in emergencies and disasters when State and local capabilities are exceeded. The Robert T. Stafford Disaster Relief and Emergency Assistance Act constitutes statutory authority for most federal disaster response activities, especially as they pertain to the federal Emergency Management Agency and its programs.

National Response Framework

The 2016 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.

Occupational Safety and Health Administration

The federal Occupational Safety and Health Act of 1970 authorizes each state (including California) to establish their own safety and health programs with the United States Department of Labor, Occupational Safety and Health Administration's (OSHA) approval. The California Department of Industrial Relations regulates implementation of worker health and safety in California. California OSHA enforcement units conduct on-site evaluations and issue notices of violation to enforce necessary improvements to health and safety practices. California standards for workers dealing with hazardous materials are contained in Title 8 of the California Code of Regulations and include practices for all industries (General Industrial Safety Orders), and specific practices for construction and other industries. Workers at hazardous waste sites (or working with hazardous wastes as might be encountered during excavation of contaminated soil) must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response regulations.

OSHA Regulation 29 Code of Federal Regulations Standard 1926.62 regulates the demolition, renovation, or construction of buildings involving lead materials. Federal, state, and local requirements also govern the removal of asbestos or suspected asbestos-containing materials (ACMs), including the demolition of structures where asbestos is present. All friable (crushable by hand) ACMs, or non-friable ACMs subject to damage, must be abated prior to demolition following all applicable regulations.

State

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. The CBC is based on the 2015 International Building Code, but has been modified for California conditions. The CBC is updated every three years, and the current (2016) CBC went into effect in January 2017. The 2019 CBC will be adopted by the California Building Standards Commission and published on or about July 1, 2019. The 2019 CBC goes into effect starting January 1, 2020. 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. The CFC is revised and published approximately every three years by the California Building Standards Commission, and the current CFC went into effect in January 2017. The CFC is based on the 2015 International Fire Code, but has been modified for California conditions. The 2019 CFC goes into effect starting January 1, 2020.

California Governor's Office of Emergency Services

The California Governor's Office of Emergency Services (Cal OES) began as the State War Council in 1943. With an increasing emphasis on emergency management, it officially became Cal OES in 1970. The California Emergency Management Agency 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 California Emergency Management Agency was responsible for the coordination of overall State agency response to major disasters in support of local government. The agency was also 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. On July 1, 2013, Governor Edmund G. Brown Jr.'s eliminated the California Emergency Management Agency and restored it to the Governor's Office as the Cal OES.

California Department of Forestry and Fire Protection

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped fire threat potential throughout California.[1] 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 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.[2]

California Environmental Protection Agency

The CalEPA was created in 1991, unifying California's environmental authority in a single cabinet-level agency and bringing the California Air Resources Board, State Water Resources Control Board, Regional Water Quality Control Boards (RWQCBs), California Department of Resources Recycling and Recovery (formerly the Integrated Waste Management Board), DTSC, Office of Environmental Health Hazard Assessment, and Department of Pesticide Regulation under one agency. These agencies were placed within the CalEPA as the "umbrella" for the protection of human health and the environment and to ensure the coordinated deployment of State resources. Its mission is to restore, protect, and enhance the environment, to ensure public health, environmental quality, and economic vitality.

Department of Toxic Substance Control

The DTSC is a department of CalEPA and is the primary agency in California that regulates hazardous waste, cleans up existing contamination, and looks for ways to reduce the hazardous waste produced in California. The DTSC regulates hazardous waste in California primarily under the authority of the federal

[1] California Department of Forestry and Fire Protection, http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_development.php, accessed August 10, 2018.

[2] California Department of Forestry and Fire Protection, 2010, 2010 Strategic Fire Plan for California, http://cdfdata.fire.ca.gov/pub/fireplan/fpupload/fpppdf668.pdf, accessed August 10, 2018.

Resource Conservation and Recovery Act and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

Government Code Section 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites, Department of Health Services (DHS) lists of contaminated drinking water wells, sites listed by the State Water Resources Control Board as having underground storage tank (UST) leaks and which have had a discharge of hazardous wastes or materials into the water or groundwater, and lists from local regulatory agencies of sites that have had a known migration of hazardous waste/material.

Regional Water Quality Control Board

The RWQCB is a department of CalEPA that oversees investigation and cleanup of sites including underground storage tanks where wastes have been discharged in order to protect the water quality of the state. The RWQCB regulates wastewater discharges to surface waters and to groundwater. They also regulate storm water discharges from construction, industrial, and municipal activities.

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.

Asbestos-Containing Materials Regulations

State-level agencies, in conjunction with the federal EPA 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.

Lead-Based Paint Regulations

Lead was formerly used as an ingredient in paint (before 1978) and as a gasoline additive; both uses have been banned. Lead is listed as a reproductive toxin and a cancer-causing substance; it also impairs the development of the nervous system and blood cells in children.[3] Lead-based paint is defined in Code of

[3] California Department of Toxic Substances Control, 2010, https://www.dtsc.ca.gov/Schools/SchoolsAdvGuidance.cfm, accessed November 14, 2018.

Federal Regulations Title 40 Part 745 as paint or other surface coatings that contain lead equal to or more than 1.0 milligram per square centimeter or 0.5 percent by weight. Those demolishing pre-1978 structures may presume the buildings contain lead-based paint (LBP) without having an inspection for LBP. Lead must be contained during demolition activities (California Health and Safety Code sections 17920.10 and 105255). Title 29 Code of Federal Regulations Part 1926 establishes standards for occupational health and environmental controls for lead exposure. The standard also includes requirements addressing exposure assessment, methods of compliance, respiratory protection, protective clothing and equipment, hygiene facilities and practices, medical surveillance, medical removal protection, employee information and training, signs, recordkeeping, and observation or monitoring.

Regional

San Francisco Bay Regional Water Quality Control Board

The Porter-Cologne Water Quality Act[4] established the State Water Resources Control Board and divided the state into nine regional basins, each under the jurisdiction of a RWQCB. The San Francisco Bay Region (Region 2) RWQCB (San Francisco Bay RWQCB) regulates water quality in the project 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.

Bay Area Air Quality Management District

The Bay Area Air Quality Management District 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. The Bay Area Air Quality Management District 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).

Local

Santa Clara County Department of Environmental Health

The Santa Clara County Department of Environmental Health's Hazardous Materials Compliance Division is the Certified Unified Program Agency (CUPA) for the City of Campbell and consolidates, coordinates, and makes consistent the following existing programs:

- Aboveground Storage Tank Spill Prevention, Control Countermeasure Plan (California Health and Safety Code, Chapter 6.6.7)
- Underground Storage Tank Program (UST)
- California Accidental Release Prevention program
- Hazardous Waste Generator and Onsite Hazardous Waste Treatment (tiered permitting) Programs (California Health and Safety Code, Chapter 6.5)

[4] California Water Code Sections 13000 et seq.

- Hazardous Materials Business Plan (HMBP)

Santa Clara County Fire Department

The Santa Clara County Fire Department (SCCFD) administers the following programs within the City of Campbell through its 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 in the 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.

City of Campbell General Plan

Key strategies of the General Plan relevant to the proposed project are included in Table 4.7-1.

TABLE 4.7-1 CITY OF CAMPBELL GENERAL PLAN STRATEGIES PERTAINING TO HAZARDS AND HAZARDOUS MATERIALS

Strategy Number	Strategy Text
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.
Strategy HS-7.1f	Hazardous Materials Emergency Response. Work with other agencies to help ensure adequate response capability for hazardous materials emergencies.

Source: City of Campbell, 2001, City of Campbell General Plan.

[5] Santa Clara County, 2017, Emergency Operations Plan, accessed August 10, 2018.

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.
- 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 SCCFD. The 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 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 associated with the proposed project.

Hazardous Materials Sites

The 4.5-acre project site currently contains one multiple-story, multiple-tenant office building. The existing building contains a shared main lobby with a hydraulic elevator, a mechanical room, and a walled

[6] City of Campbell, 2014, *Emergency Operation Plan*.

storage enclosure. There is a large paved parking area on the northern portion of the site and smaller parking and driveway areas on the south and west side of the site building.

The subject site was developed in approximately 1975 and appears to have always been used as a multiple-tenant office building since that time. Based on the 1975 construction date, there is a potential that asbestos-containing materials (ACM)s and/or lead-based paint (LBP) have been used at the project site. The property is in a commercial area of Campbell containing a mix of commercial, office, and light industrial uses. The property is adjacent to a multi-use trail along the Los Gatos Creek to the east.

Table 4.7-2 shows properties listed within a 0.25-mile radius from the project site according to several hazardous waste databases, including DTSC's EnviroStor,[7] RWQCB's Geotracker,[8] EPA's EJScreen,[9] and EPA's EnviroMapper.[10]

The Phase I ESA prepared for the project does not identify any recognized environmental condition on-site. A "recognized environmental condition" refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The Phase I ESA does not reveal any releases on the site or other issues on the subject site or adjacent properties that are likely to impact the project site.

Existing or Proposed Schools

There are no schools within 0.25 mile of the project site. The nearest school is the Village School, located 0.5 miles northwest of the project site.

Airport Hazards

The City of Campbell is not located within an airport land use plan area. The nearest public use airport is the Norman Mineta San José International Airport, located roughly 7.25 miles north from the project site. There are no other public use airports within 2 miles of the project site. Likewise, there are no private airstrips within or near the project site.[11] The Santa Clara Valley Medical Center, located 3.8 miles north of the site, operates a helipad.

[7] Department of Toxic Substances Control, 2018, EnviroStor, https://www.envirostor.dtsc.ca.gov/public/, accessed August 28, 2018.

[8] State Water Resources Control Board, 2015, GeoTracker, http://geotracker.waterboards.ca.gov/, accessed August 28, 2018.

[9] Environmental Protection Agency, 2018, EJScreen, https://ejscreen.epa.gov/mapper/, accessed August 28, 2018.

[10] Environmental Protection Agency, EnviroMapper, https://www.epa.gov/emefdata/em4ef.home, accessed August 28, 2018.

[11] AirNav, 2016, Browse Airport, Unites States of America, California, http://www.airnav.com/airports/us/CA, accessed August 10, 12018.

TABLE 4.7-2 OFF-SITE HAZARDOUS MATERIALS SITES LISTINGS

Site Name Address, Distance and Direction from Project Site	Reason for Listing
The Former Fillauer Property 561 Division Street, Campbell, 0.27 miles northwest	Department of Environmental Health Cleanup Program Site
Silicon Genesis Corps 590 Division Street, Campbell, 0.2 miles west	Tiered permit facility[a]
Ashland Chemical Co. 1600 Dell Avenue, Campbell, 0.2 miles north	Tiered permit facility[a]
Collimated Holes, Inc. 460 Division Street. Campbell, 0.05 miles west	US EPA small quantity generator[b]
Deluxe Check Printers, Inc. 1551 Dell Avenue, Campbell, 0.15 miles north	US EPA small quantity generator[b]
K&K Manufacturing, Inc. 1500 Dell Avenue, Campbell, 0.24 miles north	US EPA small quantity generator[b]
Ahead Technology Corp. 1717 Dell Avenue, Campbell, 0.01 miles east	Unspecified
Justin Industries 1735 Dell Avenue, Campbell, 0.03 miles east	Hazardous waste transporter
Sadra Medical DBA Boston Scientific 160 Knowles Drive, Los Gatos 0.12 miles west	US EPA large quantity generator
Golden State Moving Co. 470 Division Street, Campbell, 0.05 miles northwest	Hazardous waste transporter
Lucero Cables, Inc. 500 Division Street, Los Gatos 0.12 northwest	Unspecified
Sinclair Systems Int., Inc. 530 Division Street, Campbell, 0.12 northwest	US EPA small quantity generator[b]
Hosmer-Dorrance Corp. 561 Division Street, Campbell, 0.13 northwest	US EPA small quantity generator[b]
Star Microwave 540 Division Street, Campbell, 0.13 northwest	US EPA small quantity generator[b]
M and M Audi House 3375 S Winchester Boulevard, Campbell, 0.21 northwest	US EPA small quantity generator[b]
Chevron Station Number 98122 3405 Winchester Boulevard, Campbell, 0.21 northwest	US EPA small quantity generator[b]
Jesee Bros Machine Shop 1640 Dell Avenue, Campbell, 0.12 northeast	US EPA small quantity generator[b]
Tru Color Concepts 1610 Dell Avenue Unit E, Campbell, 0.13 northeast	Unspecified
Sowden Spencer, Inc. 1587 Dell Avenue, Campbell, 0.14 northeast	US EPA small quantity generator[b]
Zircon international, Inc. 1580 Dell Avenue, Campbell,0.16 northeast	US EPA small quantity generator[b]
Encore international 1520-B Dell Avenue, Campbell, 0.21 northeast	Unspecified
Noel Technologies 1510 Dell Avenue, Campbell, 0.23 northeast	Unspecified

a. Tiered Permitting is a term used to refer to the onsite treatment of hazardous waste.
b. Small Quantity Generators (SQGs) generate more than 220 pounds, but less than 2,200 pounds of hazardous waste per month.
Sources: Compiled by PlaceWorks from DTSC's EnviroStor, 2018; SWRCB GeoTracker, 2015; EPA's EJScreen, 2018; and EPA's EnviroMapper; 2018.

Wildland Fire Hazard

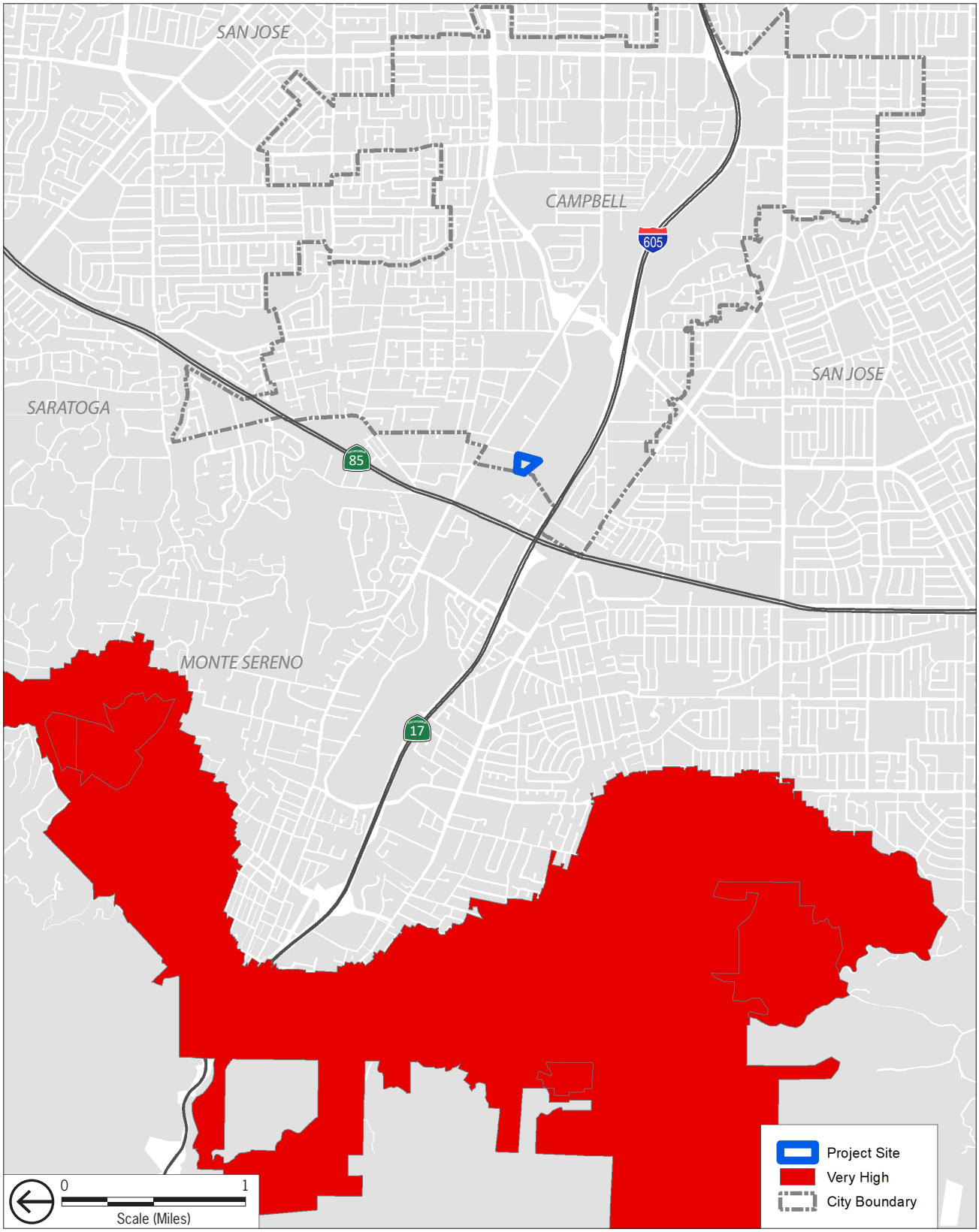
CAL FIRE evaluates fire hazard severity risks according to areas of responsibility (i.e., federal, State, and local). According to CAL FIRE, there are no very high fire hazard severity zones within the Local Responsibility Area for the City of Campbell, including the project site. The nearest very high fire hazard severity zones within the Local Responsibility Area are shown on Figure 4.7-1. Also, there are no moderate, high, and very high fire hazard severity zones in the State Responsibility Area in the vicinity of the City of Campbell, including the project site. The nearest fire hazard severity zones within the State Responsibility Area are shown on Figure 4.7-2.

4.7.2 IMPACT DISCUSSION

4.7.2.1 STANDARDS OF SIGNIFICANCE

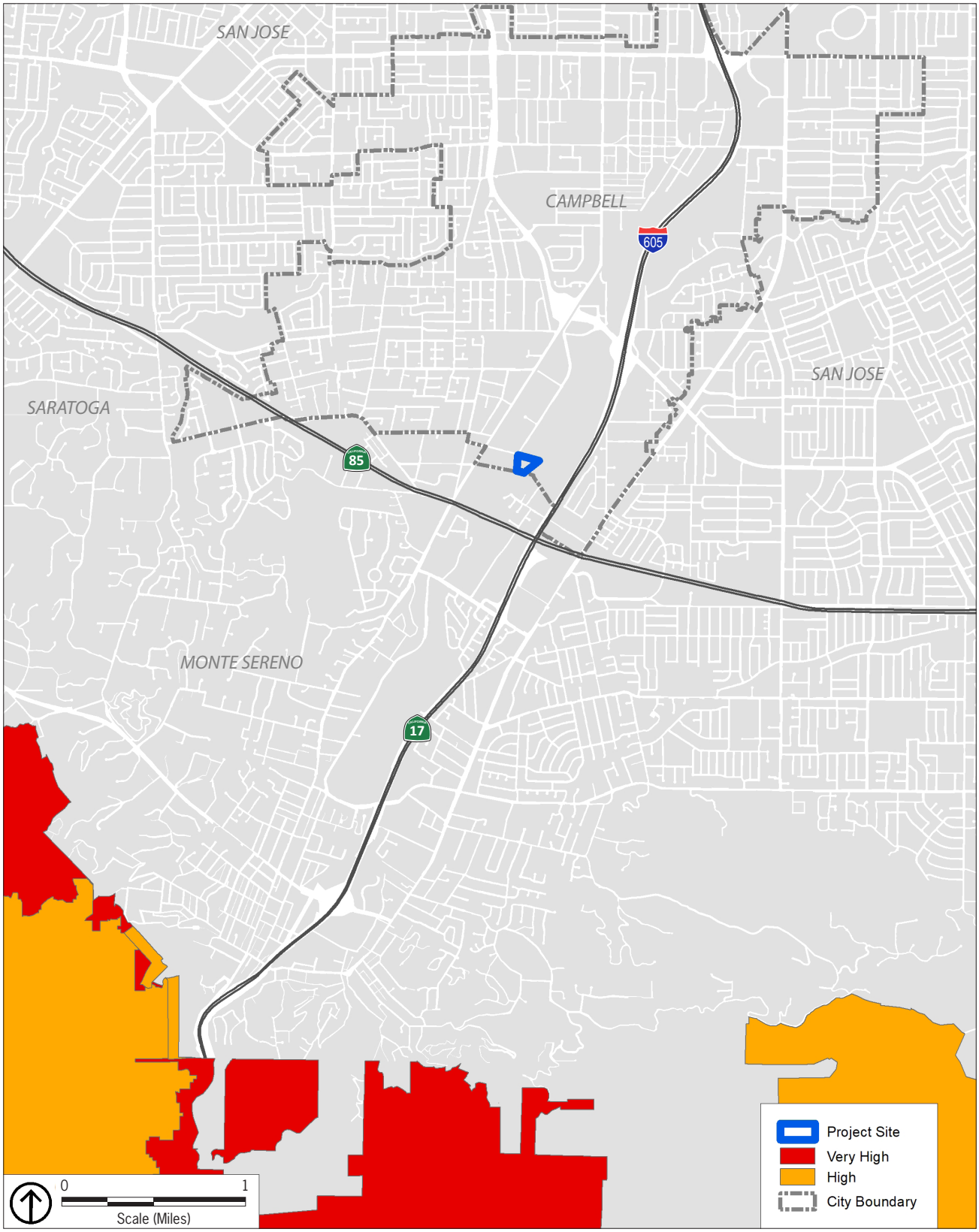
Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in Section 4.7.2.2 uses the following standards of significance. The proposed project would have a significant impact regarding hazards and hazardous materials if it would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. 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.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼-mile of an existing or proposed school.
4. 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.
5. 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 that results in a safety hazard for people residing or working in the project area.
6. Be within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area.
7. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.



Source: ESRI, 2018; CAL FIRE, 2007

Figure 4.7-1
Very High Fire Hazard Severity Zones in Local Responsibility Area



Source: ESRI, 2018; CAL FIRE, 2007

Figure 4.7-2
Fire Hazard Severity Zones in State Responsibility Area

8. 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.

4.7.2.2 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance as identified in Section 4.1.2.1 above.

HAZ-1	**Implementation of the proposed project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.**

Project Operation

The use, storage, transport, and disposal of hazardous materials is governed by existing regulations of several agencies, including the EPA, Department of Transportation, California Division of Occupational Safety and Health, and the Santa Clara County Department of Environmental Health. Furthermore, the City of Campbell, Santa Clara County Department of Environmental Health's Hazardous Materials Compliance Division, and SCCFD coordinate the review of building permits to ensure that emergency response plan requirements and hazardous materials requirements are met prior to construction.

Operation of the proposed offices would involve the use of small amounts of hazardous materials, such as cleansers, paints, fertilizers, and pesticides, for cleaning and maintenance purposes. However, as an office development, the proposed land use is not associated with uses that use, generate, store, or transport large quantities of hazardous materials; such uses generally include manufacturing, industrial, medical (e.g., hospital), and other similar uses. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that any potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts.

Therefore, substantial hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during long-term operation of the proposed project would not occur. Impacts would be *less than significant* and no mitigation measures are necessary.

Project Construction

Project-related construction activities would involve the use of larger amounts of hazardous materials than would project operation. Construction activities would include the use of materials such as fuels, lubricants, and greases in construction equipment and coatings used in construction. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature, and would cease upon completion of the proposed project's construction phase. Project construction workers would also be trained in safe handling and hazardous materials use.

Additionally, as with project operation, the use, storage, transport, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner to minimize the potential for safety impacts. Furthermore, strict adherence to all emergency response plan requirements set forth by Santa Clara County Department of Environmental Health would be required through the duration of the project construction phase.

The demolition phase of the project would include the demolition of the existing on-site structures. The Phase I ESA for the project identifies a potential that ACMs and/or LBP might be present. The handling of demolition debris containing ACMs and/or LBP would be subject to ACM and LBP regulations; however without further mitigation this impact would be *significant*.

Significance without Mitigation: Significant.

Impact HAZ-1: Demolition of the existing office building on the project site may create a significant hazard by exposing construction workers to asbestos containing materials and/or lead-based paints.

> Mitigation Measure HAZ-1: Prior to the disturbance of any suspect asbestos-containing materials and/or lead-based paint, a certified consultant shall conduct a comprehensive survey to determine if the suspect materials are present. If such materials are identified, a licensed abatement contractor shall be consulted and demolition activities shall be conducted in compliance with abatement recommendations.
>
> Significance with Mitigation: Less than significant.

HAZ-2	**The project 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.**

Demolition of the existing on-site structure could potentially result in the release of hazardous building materials (i.e., ACM and LBP) into the environment. Use of hazardous materials during construction could potentially include fuels, lubricants, greases, and coatings. Use of hazardous materials after construction could potentially include cleaning solvents, fertilizers, pesticides, and other materials used in the regular maintenance and operation of the proposed uses. An accidental release of any of these materials could pose a health hazard to the public.

Existing laws, regulations, policies, and procedures that would serve to prevent a release of hazardous materials include applicable federal, State, and local laws and regulations described in Section 4.7.1.1, Regulatory Framework, of this chapter, and the Stormwater Pollution Prevention Plan and best management practices required for the proposed project (see Chapter 4.8, Hydrology and Water Quality, for additional detail). Compliance with these existing laws, regulations, policies, and procedures would help to ensure that future development activities would not create a significant hazard to the public during an upset or accident conditions. Therefore, this impact would be *less than significant*.

Significance without Mitigation: Less than significant.

HAZ-3	The project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

There are no schools within 0.25 miles of the project site. The nearest school is the Village School located 0.5 miles northwest of the project site. Therefore, there would be *no impact*.

Significance without Mitigation: No impact.

HAZ-4	Implementation of the proposed project 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 4.7.1.2, Existing Conditions, the Phase I ESA prepared for the project does not identify any recognized environmental condition on the project site.

The Phase I ESA also includes a search of standard federal, State, County, and City environmental records. The database records search found no properties surrounding the site that could represent a significant environmental concern. (Please refer to the Phase I ESA in Appendix F of this Draft EIR for further details regarding the regulatory records review.)

The proposed site is not included on a list of hazardous materials sites compiled pursuance to Government Code Section 65962.5 and impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

HAZ-5	The project would not be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, resulting in a safety hazard for people residing or working in the project area.

The City of Campbell is not located within an airport land use plan area. The nearest public use airport is the Norman Mineta San José International Airport, located roughly 7.25 miles north of the project site. No other public use airports are within two miles of the project site.[12] Therefore, there would be *no impact*.

Significance without Mitigation: No impact.

[12] California Department of Transportation, 2016, Caltrans Aviation GIS Data, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=32c3cbe24491427d872e2fec173a4b22, accessed August 10, 2018.

HAZ-6	The project would not be located within the vicinity of a private airstrip and result in a safety hazard for people residing or working in the project area.

There are no private airstrips within or near the project site.[13] The Santa Clara Valley Medical Center, located 3.8 miles north of the site, operates a helipad.

Hazards to helipads include structures located within navigable airspace. The proposed office building would have a maximum height of 72 feet (60 feet plus 12 feet for mechanical screen) and the proposed parking garage would have a maximum height of 43.5 feet. The structures would not interfere with navigable airspace for helicopters using the Santa Clara Medical Center helipad due to the fact that the helipad is almost 4 miles away from the project site. Therefore, the impact would be *less than significant*.

Significance without Mitigation: Less than significant.

HAZ-7	Implementation of the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

The proposed project would result in a significant impact if it would involve physical improvements that would impede emergency response to the project site or the immediate vicinity, or if it would otherwise interfere with emergency evacuation plans.

The proposed project would be required to comply with the provisions of the 2016 CFC and the 2016 CBC, or the codes in effect at time of building plan application. These provisions would ensure that building and life safety measures are incorporated into the proposed project and would facilitate implementation of emergency response plans. Future development plans will include fire and emergency access through all phases of construction and operation. The SCCFD has reviewed the proposed project site plans and has approved the plans. During construction, the project would be required to comply with all applicable provisions of the CFC to ensure fire safety during the construction phase. The project plans have been developed to be consistent with requirements for the provision of fire sprinklers, fire department access, fire hydrants, and water supply for fire protection.

The City of Campbell has prepared an Emergency Operations Plan (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 proposed project would redevelop an existing site and would not involve physical components that would interfere with the ability of the City, County, and emergency response service providers to implement emergency response activities within the project site or vicinity.

[13] AirNav, 2016, Browse Airport, Unites States of America, California, http://www.airnav.com/airports/us/CA, accessed August 10, 2018.

The Campbell General Plan identifies the following roadways as evacuation routes in the event of an emergency: Hamilton Avenue, Bascom Avenue, Winchester Boulevard, Campbell Avenue, Highway 17, and the San Tomas Expressway.[14] The development of the project would not create traffic impacts for vehicles leaving Campbell on any of these roadways.

In addition, the General Plan contains strategies that would further ensure that new development would not conflict with emergency operations in the project area. Strategies HS-1.1b and HS-1.1f require coordination with the City departments to ensure emergency operations will comply with the Standardized Emergency Management System, including implementing minimum street width and vertical clearance for new development. Strategies HS-1.3a and HS-1.3d ensure that emergency operations are consistent throughout Santa Clara County through inter-agency coordination and information sharing for emergency preparedness, response and recovery, and mitigation activities. Strategies HS-7.1d and HS-7.1f focus on response activities through ensuring business that handle and transport hazardous materials have appropriate emergency response plans and that emergency response is adequate for hazardous materials emergencies.

Compliance with applicable laws and regulations regarding emergency preparedness, and the General Plan policies, would ensure that the proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan and impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

HAZ-8	**The project 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.**

The project site is located within a primarily urbanized area of Campbell, surrounded by developed lands to the north and west, and the Los Gatos Creek County Park to the south and east. The Los Gatos Creek County Park is not within a fire hazard severity zone. The project site is not located within a fire hazard severity zone and therefore would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires (refer to Figure 4.7-1 and 4.7-2).

The proposed project would be required to comply with the 2016 CFC and 2016 CBC, or the codes in effect at time of building plan application. The codes include the installation of sprinklers, proper protection systems such as fire extinguishing systems and alarms, fire hydrants, water fire flow requirements, and access points to accommodate fire equipment. Compliance with existing codes, and the project site location outside of fire hazard areas, would ensure that impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

[14] City of Campbell, 2001, General Plan, page HS-2.

4.7.3 CUMULATIVE IMPACTS

HAZ-9 The proposed project would result in less-than-significant cumulative impacts with respect to hazards and hazardous materials.

The area considered for cumulative impacts is Santa Clara County, which is the service area for the Santa Clara County Department of Environmental Health, the affected CUPA. The population of Santa Clara County is forecast to increase from about 1.88 million in 2015 to 2.42 million in 2040.[15] Cumulative development projects in the area, including the medical office buildings at 250 Hacienda Avenue and the Samaritan Medical Campus development in San José, would use, store, transport, and dispose of increased amounts of hazardous materials, and thus could pose substantial risks to the public and the environment. However, these projects would be required to conform to existing regulations from multiple agencies, as described in Section 4.7.1.1 above, and would avoid impacts relating to the use and transport of hazardous materials.

The project site is not located within 0.25 miles of a school or 2 miles of a public airport or a private airstrip or helipad; therefore, the proposed project would not contribute to a cumulative impact associated with schools and public or private airports.

Cumulative projects have the potential to interfere with an adopted emergency response plan or emergency evacuation plan; however, all development would be required to comply with the provisions of the local, State, and federal regulations for emergency response plans and emergency evacuation plans. Compliance with these regulations would reduce potential cumulative impacts to less than significant.

Furthermore, cumulative projects have the potential to increase development in areas of high fire susceptibility; however, all development would be required to comply with the provisions of the local and State regulations for wildland fires. Compliance with these regulations would reduce potential cumulative impacts to less than significant.

Cumulative impacts would be less than significant after compliance with regulations, and project impacts would not be cumulatively considerable.

Significance without Mitigation: Less than significant.

[15] Association of Bay Area Governments, 2013, Projections 2013.

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4.8 HYDROLOGY AND WATER QUALITY

This chapter describes the regulatory framework and existing conditions on the project site related to hydrology and water quality, and the potential impacts of the project on hydrology and water quality.

The information in this chapter is based in part on the following documents:

- Chang Architecture, February 28, 2019. Stormwater Control Plan.
- Chang Architecture, February 28, 2019. Underground Piping Plan.

Complete copies of these documents are included in Appendix G to this Draft EIR.

4.8.1 ENVIRONMENTAL SETTING

4.8.1.1 REGULATORY FRAMEWORK

Federal Regulations

Clean Water Act

Under the Clean Water Act (CWA) of 1977, the United States Environmental Protection Agency (EPA) seeks to restore and maintain the chemical, physical, and biological integrity of the nation's waters. The statute employs a variety of regulatory and non-regulatory tools to reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff. The CWA authorizes the EPA to implement water-quality regulations. The National Pollutant Discharge Elimination System (NPDES) permit program under Section 402(p) of the CWA controls water pollution by regulating stormwater discharges into the waters of the United States. California has an approved State NPDES program. The EPA has delegated authority for water permitting to the State Water Resources Control Board (SWRCB), which has nine regional boards. The San Francisco Bay Regional Water Quality Control Board (RWQCB) regulates water quality in Region 2, which includes the City of Campbell.

Section 303(d) of the CWA requires that each state identify water bodies or segments of water bodies that are "impaired" (i.e., not meeting one or more of the water quality standards established by the state). These waters are identified in the Section 303(d) list as waters that are polluted and need further attention to support their beneficial uses. Once the water body or segment is listed, the state is required to establish Total Maximum Daily Load (TMDL) for the pollutant causing the conditions of impairment. TMDL is the maximum amount of a pollutant that a water body can receive and still meet water quality standards. Typically, TMDL is the sum of the allowable loads of a single pollutant from all contributing point and non- point sources. The intent of the 303(d) list is to identify water bodies that require future development of a TMDL to maintain water quality. In accordance with Section 303(d), the RWQCB has identified impaired water bodies within its jurisdiction, and the pollutants or stressors responsible for impairing the water quality.

The receiving water for the project site is Lower San Francisco Bay, which is listed on the Section 303(d) List of Water Quality Limited Segments for chlordane, dichloro diphenyl trichloroethane (DDT), dieldrin, dioxin compounds, furan compounds, invasive species, mercury, polychlorinated biphenyls (PCBs), and

trash.[1] Chlordane, DDT, and dieldrin are organochlorine insecticides; PCBs were commonly used as coolants in electrical equipment.

National Pollutant Discharge Elimination System

The 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 (MS4). Under the NPDES program, all facilities that discharge pollutants into waters of the United States are required to obtain an NPDES permit. Requirements for stormwater discharges are also regulated under this program. In California, the NPDES permit program is administered by the SWRCB through the nine RWQCBs. Discharge of stormwater runoff from construction sites of one or more acres is covered under the Statewide General Construction Permit (GCP).

State Regulations

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act (Water Code Section 13000 *et seq.*) is the basic water quality control law for California. Under this Act, the SWRCB has ultimate control over State water rights and water quality policy. In California, the EPA has delegated authority to issue NPDES permits to the SWRCB. 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.

The project site is in the Guadalupe Watershed, which is under the jurisdiction of the San Francisco Bay RWQCB. The Water Quality Control Plan for the San Francisco Bay Watershed was last updated in 2017. This Basin Plan gives direction on the 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.

Statewide General Construction Permit

Construction projects of 1 acre or more are regulated under the GCP, Order No. 2012-0006-DWQ, issued by the SWRCB in 2012. Projects obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) estimating sediment risk from construction activities to receiving waters, and specifying best management practices (BMPs) that would be used by the project to minimize pollution of stormwater.

[1] State Water Resources Control Board, 2014, Impaired Water Bodies, http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml, accessed August 24, 2018.

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, 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.

Regional Regulations

National Pollutant Discharge Elimination System (NPDES) Permits

Municipal stormwater discharge in the City of Campbell is subject to the Waste Discharge Requirements of the MS4 Permit (Order Number R2-2015-0049, NPDES Permit Number CAS612008 as amended by Order Number R2-2019-0004). Provision C.3 of the MS4 Permit requirements apply to all new development or redevelopment projects that create or replace 10,000 square feet of impervious surfaces and specific land use projects that create or replace 5,000 square feet of impervious surfaces (i.e., auto service facilities, retail gasoline outlets, restaurants, and/or uncovered surface parking). Provision C.3 of the MS4 Permit 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. New development projects must treat 100 percent of the calculated runoff (based on the sizing criteria described in the C.3 provisions of the MS4 Permit) with LID treatment measures that include harvesting and reuse infiltration, evapotranspiration, or biotreatment/bioretention.

Furthermore, wastewater discharge is regulated under the NPDES permit program for direct discharges into receiving waters. A discussion of the wastewater NPDES permit as it relates to the proposed project is included under Section 4.14.2.1 in Chapter 4.14, Utilities and Service Systems, of this Draft EIR.

Santa Clara Valley Urban Runoff Pollution Prevention Program

The Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) is an association of fifteen agencies in Santa Clara Valley that share a common permit to discharge stormwater to South San Francisco Bay.

Post-construction stormwater quality requirements pursuant to the SCVURPPP are explained in the SCVURPPP C.3 Stormwater Handbook issued in June 2016. The C.3 Stormwater Handbook includes instructions for implementing site design measures, source controls, stormwater treatment measures, construction site controls, and LID measures.

The C.3 Handbook sets forth thresholds for when various categories of water quality protection measures are required and offer step-by-step instructions on how to incorporate stormwater control and LID designs into project applications.[2]

Santa Clara County Operational Area Hazard Mitigation Plan

Santa Clara County and a partnership of local governments within the county have developed a hazard mitigation plan to reduce risks from natural disasters in the Santa Clara County Operational Area—defined as the unincorporated county and incorporated jurisdictions within the geographical boundaries of the county. The plan details long-term and short-term policies, programs, projects, and other activities to alleviate the death, injury, and property damage that can result from a disaster.

Santa Clara Valley Water District Guidelines and Standards for Land Use Near Streams

The Guidelines and Standards for Land Use Near Streams[3] address land use activities near streams and aim to protect surface and groundwater quality and quantity in Santa Clara County. They are based on a compilation of the existing practices the Santa Clara Valley Water District (SCVWD) uses when reviewing permits for land uses near streams under its current requirements based on Ordinance 83-2. The guidelines include tools, standards, and procedures to protect streams and streamside resources in Santa Clara County. The City of Campbell adopted the guidelines in 2008 (City Council Resolution Number 10952).

[2] Santa Clara Valley Urban Runoff Pollution Prevention Program, 2016, C3, Stormwater Handbook, http://scvurppp-w2k.com/pdfs/1516/c3_handbook_2016/SCVURPPP_C.3_Technical_Guidance_Handbook_2016_Chapters.pdf, accessed August 24, 2018.

[3] Prepared by the Santa Clara Valley Water Resources Protection Collaborative.

Local Regulations

Chapter 14.02 of the Campbell City Municipal code relates to stormwater pollution control. The purpose of this chapter is to provide minimum requirements designed to control the discharge of pollutants into the city municipal storm drain system and to assure that discharges from the city municipal storm drain system comply with applicable provisions of the CWA and the current NPDES permit including amendments and California RWQCB approvals.

4.8.1.2 EXISTING CONDITIONS

Surface Waters

The Guadalupe River Watershed drains approximately 171 square miles. The headwaters drain from the eastern Santa Cruz Mountains near the summit of Loma Prieta in heavily forested unincorporated county land with pockets of low-density residential developments. The Guadalupe River begins on the Valley floor at the confluence of Alamitos Creek and Guadalupe Creek, just downstream of Coleman Road in San José. From here it flows north, approximately 14 miles until it discharges to the Lower South San Francisco Bay via Alviso Slough. On its journey, it traverses through the town of Los Gatos, and the cities of San José, Campbell, and Santa Clara, and is joined by three other tributaries: Ross, Canoas, and Los Gatos Creek. The largest of these, Los Gatos Creek joins the mainstream about 3.5 miles downstream of its origination, and passes from unincorporated county land, through the towns of Monte Sereno and Los Gatos and the cities of Campbell and San José.[4]

The Los Gatos Creek and Los Gatos Creek Trail are located immediately to the east of the site. The Santa Clara Valley District owns this property.

Surface Water Quality

The Los Gatos Creek and San Tomas Aquinas Creek run through the City of Campbell. Both creeks are listed on the CWA Section 303(d) List of Water Quality Limited Segments. Runoff from the project site ultimately drains to the Los Gatos Creek, which then discharges to Lower San Francisco Bay. Los Gatos Creek is listed for diazinon.[5] Lower San Francisco Bay is listed for chlordane, DDT, dieldrin, dioxin compounds, furan compounds, invasive species, mercury, polychlorinated biphenyls (PCBs), and trash.[6,7]

[4] Santa Clara Valley Urban Runoff Pollution Prevention Program, Guadalupe Watershed, http://www.scvurppp-w2k.com/ws_guadalupe.shtml, accessed August 24, 2018.

[5] Diazinon is an organophosphorus insecticide.

[6] Chlordane, DDT, and dieldrin are organochlorine insecticides; dioxin compounds are hydrocarbons and chlorinated hydrocarbons that are byproducts of various industrial processes; furan compounds are hydrocarbons occurring in heated food products; polychlorinated biphenyls are chlorinated hydrocarbons that were formerly used as coolants in electrical equipment.

[7] State Water Resources Control Board, 2014, Impaired Water Bodies, http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml, accessed August 24, 2018.

Groundwater

The project site overlies the Santa Clara subbasin of the Santa Clara Valley Groundwater Basin.[8] The San Clara subbasin has a surface area of 153,600 acres. The Diablo Range bounds it on the west and the Santa Cruz Mountains form the basin boundary on the east. It extends from the northern border of Santa Clara County to the groundwater divide near the town of Morgan Hill. [9]

Groundwater Quality

The groundwater in the Santa Clara subbasin is generally of a bicarbonate type, with sodium and calcium the principal cations. Although hard, it is of good to excellent mineral composition and suitable for most uses. Drinking water standards are met at public supply wells without the use of treatment methods.[10]

Water Supply Sources

The City's current water supplies are provided by San Jose Water Company. San Jose Water has three sources of potable supply: groundwater, imported treated surface water and local surface water.

The Santa Clara Valley Water District (SCVWD) was formed in 1929 in response to groundwater overdraft and significant land subsidence. The District utilizes conjunctive use to supplement groundwater and to sustain reliability in dry years by maintaining a comprehensive managed recharge program. The program helps to maintain adequate groundwater storage, keep groundwater levels above subsidence thresholds, and maintain flow gradients. Groundwater comprises just over one third of San Jose Water's water supply. San Jose Water has over 100 wells that pump water from the major water-bearing aquifers of the Santa Clara subbasin. These aquifers are recharged naturally by rainfall and artificially by a system of local reservoirs, percolation ponds, and an injection well operated by the SCVWD. The Camden Percolation Lake is located 400 feet southeast of the project site.

Additionally, San Jose Water is under contract with the SCVWD to purchase about 50 percent of the needed water supply in the form of treated water. This water originates from several sources including local reservoirs, the State Water Project, and the federally funded Central Valley Project San Felipe Division.

San Jose Water's final source of potable water is from surface water in the local watersheds of the Santa Cruz Mountains. A series of dams and automated intakes collect water released from San Jose Water's lakes. The water is then sent to San Jose Water's Montevina Filter Plant for treatment prior to entering the

[8] California Department of Water Resources, 2016, Groundwater Basin Boundary Assessment Tool, https://gis.water.ca.gov/app/bbat/, accessed August 24, 2018.

[9] California's Groundwater Bulletin 118, 2004, Santa Clara Valley Groundwater Basin, Santa Clara Subbasin, https://water.ca.gov/LegacyFiles/pubs/groundwater/bulletin_118/basindescriptions/2-9.02.pdf, accessed August 24, 2018.

[10] California's Groundwater Bulletin 118, 2004, Santa Clara Valley Groundwater Basin, Santa Clara Subbasin, https://water.ca.gov/LegacyFiles/pubs/groundwater/bulletin_118/basindescriptions/2-9.02.pdf, accessed August 24, 2018.

distribution system. San Jose Water's Saratoga Treatment Plant draws water from a local stream which collects water from the nearby Santa Cruz Mountains.[11]

In addition to the water supplied by San Jose Water, there are existing wells on the project site.

Site Drainage

The 4.5-acre project site is currently developed with an office building and a surface parking lot. The total existing impervious surface area is 153,207 square feet and the existing pervious surface area is 40,914 square feet.[12] Runoff from the existing site is conveyed to a 30-inch reinforced concrete pipe that runs along the north boundary of the site. Runoff is discharged from the storm drain into Los Gatos Creek.[13]

Flood Hazards

100-Year Flood Zone

The Federal Emergency Management Agency (FEMA) determines floodplain zones in an effort to assist cities in mitigating flooding hazards through land use planning. FEMA also outlines specific regulations for any construction within a 100-year floodplain. The 100-year floodplain is defined as an area that has a 1 percent chance of being inundated during a 12-month period. FEMA also prepares maps for 500-year floods, which mean that in any given year, the risk of flooding in the designated area is 0.2 percent. According to FEMA FIRM No 06085C0239H dated May 18, 2009, the northeast corner of the site is located in a 100-year flood zone.[14] Currently, there are no structures in this area; only parking lots and hardscape (see Figure 4.8-1).

Dam Inundation Area

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.[15] 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 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

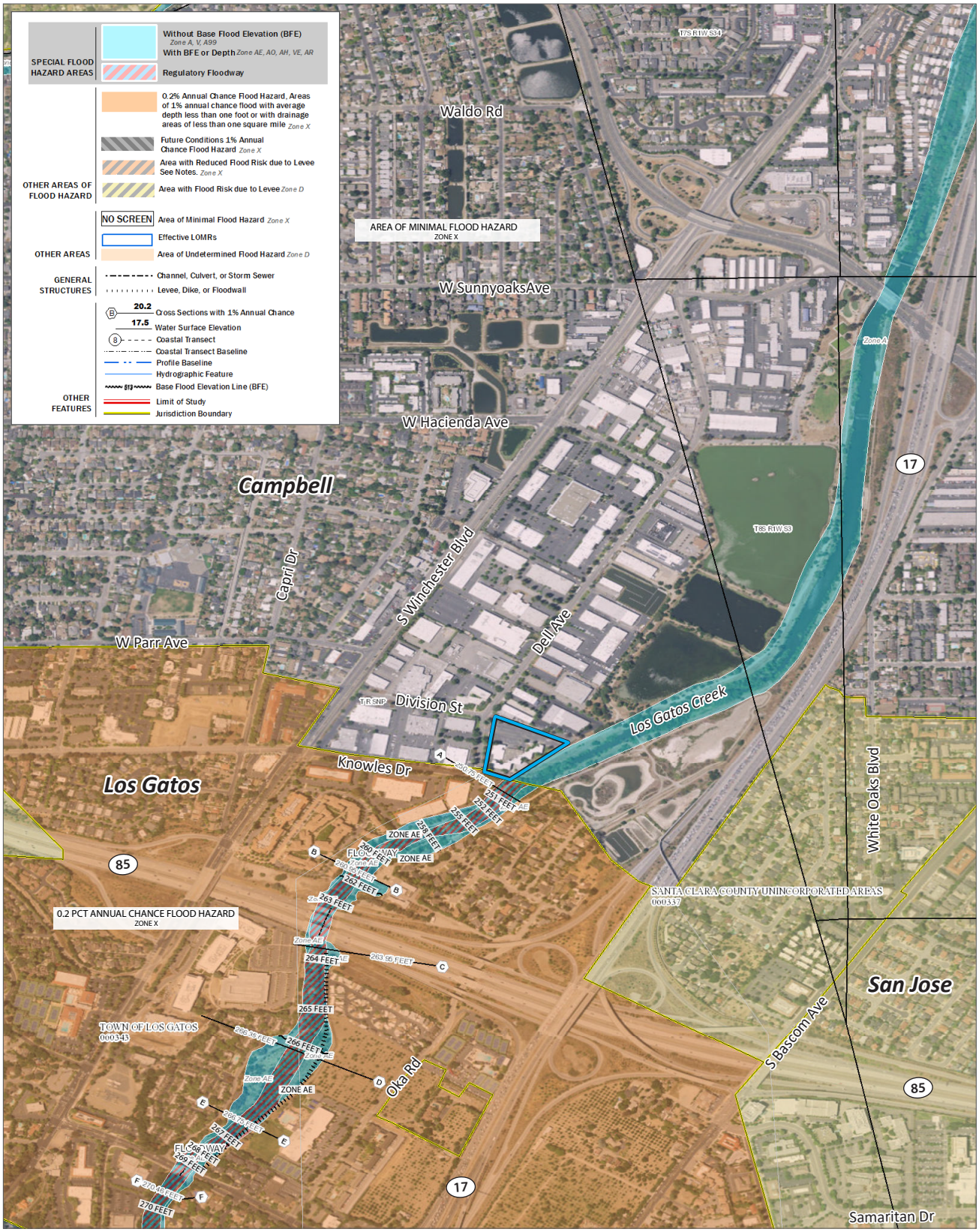
[11] San Jose Water Company, 2011, 2010 Urban Water Management Plan, https://water.ca.gov/LegacyFiles/urbanwatermanagement/2010uwmps/San%20Jose%20Water%20Company/SJWC'S%202010%20UWMP%20with%20Appendicies.pdf, accessed August 9, 2018.

[12] Chang Architecture, February 28, 2019, Stormwater Control Plan,

[13] County of Santa Clara, 2018, City of Campbell Storm Drain System, http://sccgov.maps.arcgis.com/apps/webappviewer/index.html?id=ee7cd17bafdc4c1ead74e243b7ce8455, accessed August 24, 2018.

[14] Federal Emergency Management Agency, FEMA Flood Map Service Canter, https://msc.fema.gov/portal/home, accessed August 24, 2018.

[15] California Emergency Management Agency, 2010, *State of California Multi-Hazard Mitigation Plan.*



Source: sc.fema.gov, 2018. PlaceWorks, 2018.

0 1,250
Scale (Feet)

Project Site Boundary

Figure 4.8-1
FEMA Flood Map

very rare occurrence. There is no historic record of dam failure in Santa Clara County or the City of Campbell.[16]

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.[17] 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.

According to the latest Cal OES dam inundation map, the inundation zone for Lexington Reservoir and Elsman Lake reach the project site.[18]

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.[19] The project site is approximately 4.5 miles northeast of the Lexington Reservoir.

The 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 2012, a seismic evaluation of the Lenihan Dam was performed by Terra/GeoPentech for the SCVWD as a requirement of the DSOD's 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 inspected immediately following future earthquakes to check that movements and cracking are consistent with those expected based on the engineering analyses and DSOD's independent analyses.[20]

San Jose Water owns Lake Elsman and has a use and diversion license for this water source; no public access is allowed to this water storage reservoir. Lake Elsman is created by an earthen dam (Austrian Dam) and has a maximum storage capacity of 6,153 acre feet. When full, Lake Elsman has a surface area of 109

[16] Santa Clara County, 2017, Santa Clara Operational Area Hazard Mitigation Plan, http://www.morgan-hill.ca.gov/DocumentCenter/View/22135/Santa-Clara-Operational-Area-Hazard-Mitigation-Plan---Volume-1, accessed August 24, 2018.

[17] CalEMA, 2013, *State of California Multi-Hazard Mitigation Plan.*

[18] California Emergency Management Agency, 2007, Dam Inundation Maps DVD.

[19] Santa Clara Valley Water District, 2018, Local Dams and Reservoirs, Lexington Reservoir and Lenihan Dam, https://www.valleywater.org/your-water/local-dams-and-reservoirs, accessed August 25, 2014.

[20] 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.

acres and a maximum depth of 149 feet.[21] The project site is approximately 9 miles north of the Austrian Dam.

Maintenance activities at Lake Elsman include managing vegetation along the dam face, maintaining the roads along the dam face, periodically removing sediment from the base of the spillway, maintaining dam facility hardware, and maintaining the roads and culverts that surround the lake. Austrian Dam is one of five San Jose Water facilities that are regulated by DSOD. DSOD has designated the dam as "Satisfactory".[22] A "Satisfactory" rating is given to dams with no existing or potential dam safety deficiencies and where acceptable performance is expected under all loading conditions (static, hydrologic, seismic).[23]

Tsunami Inundation Area

A tsunami is a sea wave caused by a sudden displacement of the ocean floor, most often due to earthquakes. The project site is not in a tsunami inundation area.[24]

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 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.

Camden Percolation Lake, Kyles Pond, Toris pond, and Elles Pond lie within a 1 mile radius from the site. Furthermore, the proposed project is located 4.5 miles northeast of the Lexington Reservoir, 9 miles north of Lake Elsman, and 1.1 mile northeast of 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 Bay Area has not been adversely affected by seiches during its history within this seismically active region of California.[25]

[21] EMC Planning Group Inc., 2016, Los Gatos Creek Watershed Maintenance Program Public Draft EIR, https://www.sccgov.org/sites/dpd/DocsForms/Documents/10652_DEIR.pdf, accessed August 24, 2018.

[22] California Department of Water Resources Division of Safety of Dams, 2017, Dams Within the Jurisdiction of the State of California, https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/All-Programs/Division-of-safety-of-dams/Files/Publications/Dams-Within-Jurisdiction-of-the-State-of-California-Alphabetically-by-Name.pdf, accessed August 24, 2018.

[23] California Department of Water Resources Division of Safety of Dams, 2017, Dams Rating Information, https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/All-Programs/Division-of-safety-of-dams/Files/Publications/DSOD-Dam-Rating-Information-and-FAQs.pdf, accessed August 24, 2018.

[24] California Department of Conservation, 2015, CGS Information Warehouse: Tsunami, http://www.quake.ca.gov/gmaps/WH/tsunamimaps.htm, accessed August 9, 2018.

[25] 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.*

Mudflow

A mudflow is a landslide composed of saturated rock debris and soil with a consistency of wet cement. The project site is relatively flat and the mapping prepared by the Association of Bay Area Governments indicates that there are no debris flow areas in the vicinity of the project site.[26]

4.8.2 IMPACT DISCUSSION

4.8.2.1 STANDARDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in Section 4.8.2.2 uses the following standards of significance. The proposed project 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 (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.
4. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.
5. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
6. Otherwise substantially degrade water quality.
7. 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.

[26] Association of Bay Area Governments, 2014, Interactive Map of Debris Flow Source Area, http://gis.abag.ca.gov/website/Hazards/?hlyr=debrisFlowSource, accessed August 24, 2018.

8. Place within a 100-year flood hazard area structures which would impede or redirect flood flows.
9. 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.
10. Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.
11. In combination with past, present, and reasonably foreseeable projects, result in significant cumulative impacts with respect to hydrology and water quality.

4.8.2.2 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance as identified in Section 4.8.2.1 above.

HYDRO-1 The project would not violate any water quality standards or waste discharge requirements.

Urban runoff can carry a variety of pollutants, such as oil and grease, metals, sediment and pesticide residues from roadways, parking lots, rooftops, and landscaped areas, and deposit them into adjacent waterways via the storm drain system. Construction activities could result in the degradation of water quality, releasing sediment, oil and grease, and other chemicals into storm drains and/or nearby water bodies.

The Los Gatos Creek and Los Gatos Creek Trail are located directly to the east of the project site. This property is owned by the SCVWD.

Construction Impacts

Clearing, grading, excavation, demolition, and construction activities associated with the proposed project have the potential to impact water quality through soil erosion and an increase in the amount of silt and debris carried in 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, the proposed project would be required to comply with the Statewide General Construction Permit (GCP) as well as prepare a Stormwater Pollution Prevention Plan (SWPPP) that requires the incorporation of Best Management Practices (BMPs) to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. Because the project would disturb one or more acres, coverage under the Statewide GCP applies. The GCP also requires that, prior to the start of construction activities, the project applicant must file Permit Registration Documents with the State Water Resources Control Board (SWRCB), which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations.

In addition, the project must comply with the City of Campbell's Municipal Code requirements, including Chapter 14.02, Stormwater Pollution Control, which is designed to reduce pollutants in stormwater discharges to the maximum extent practicable. Because the site is located in close proximity to the Los Gatos Creek, the project should also be consistent with the requirements described in the Guidelines and Standards for Land Use Near Streams.

Adherence to applicable water quality regulations, preparation of an SWPPP, and compliance with the City of Campbell's Municipal Code, would ensure that water quality standards are not violated during construction. Consequently, potential impacts associated with water quality during construction would be *less than significant.*

Operational Impacts

Runoff from office buildings 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 Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP), which include the C.3 provisions set by the San Francisco Bay Regional Water Quality Control Board (RWQCB). The Santa Clara Countywide National Pollutant Discharge Elimination System (NPDES) permit was amended in 2015 and now includes stricter requirements for incorporating post-construction stormwater control/LID measures into new development and redevelopment projects. All new and redevelopment projects must incorporate site design, source control, and treatment measures to the maximum extent practicable and use stormwater control measures that are technically feasible and not cost prohibitive. Also, each project regulated under the C.3 provisions must treat 100 percent of the amount of runoff for the project's drainage area with on-site LID treatment measures. Stormwater treatment requirements must be met by using evapotranspiration, infiltration, rainwater harvesting, and reuse, except where this is infeasible in which case landscape-based biotreatment is allowed.

Roof drains for the proposed office building and parking structure will be directed into two flow through planters. Additionally, runoff from the parking lot in the southwest corner of the site will be directed to a bioretention area, while runoff from the parking areas in the center of the site and in the northeast corner will be directed into two additional flow through planters. The south corner of the site is self-treating. Overflow runoff from the four planters is discharged from the site through a new 15-inch storm drain that will be connected to the existing 30-inch storm drain running along the northern boundary of the site. Overflow from the bioretention area is discharged from the site through a new 12-inch storm drain that is connected to the same 30-inch storm drain (see Figure 4.8-2).

In addition, the project would include beneficial landscaping to minimize irrigation, runoff, and the use of pesticides and fertilizers. Storm drain signage and maintenance, such as road sweeping and catch basin cleaning, will also be incorporated.

Because the Los Gatos Creek is located within 100 feet of the proposed site, the project would also be required to comply with the requirements described in the Guidelines and Standards for Land Use Near Streams.

A discussion of wastewater discharge requirements as it applies to wastewater generated by the proposed project is included under Section 4.14.2.3 Impact UTIL-4.

With the implementation of site design, source control, treatment control, and low impact development (LID) features, in addition to adherence to applicable water quality regulations, and wastewater discharge requirements the operational and construction impacts to water quality would be *less than significant*.

Significance without Mitigation: Less than significant.

HYDRO-2	**The project would not 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 (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).**

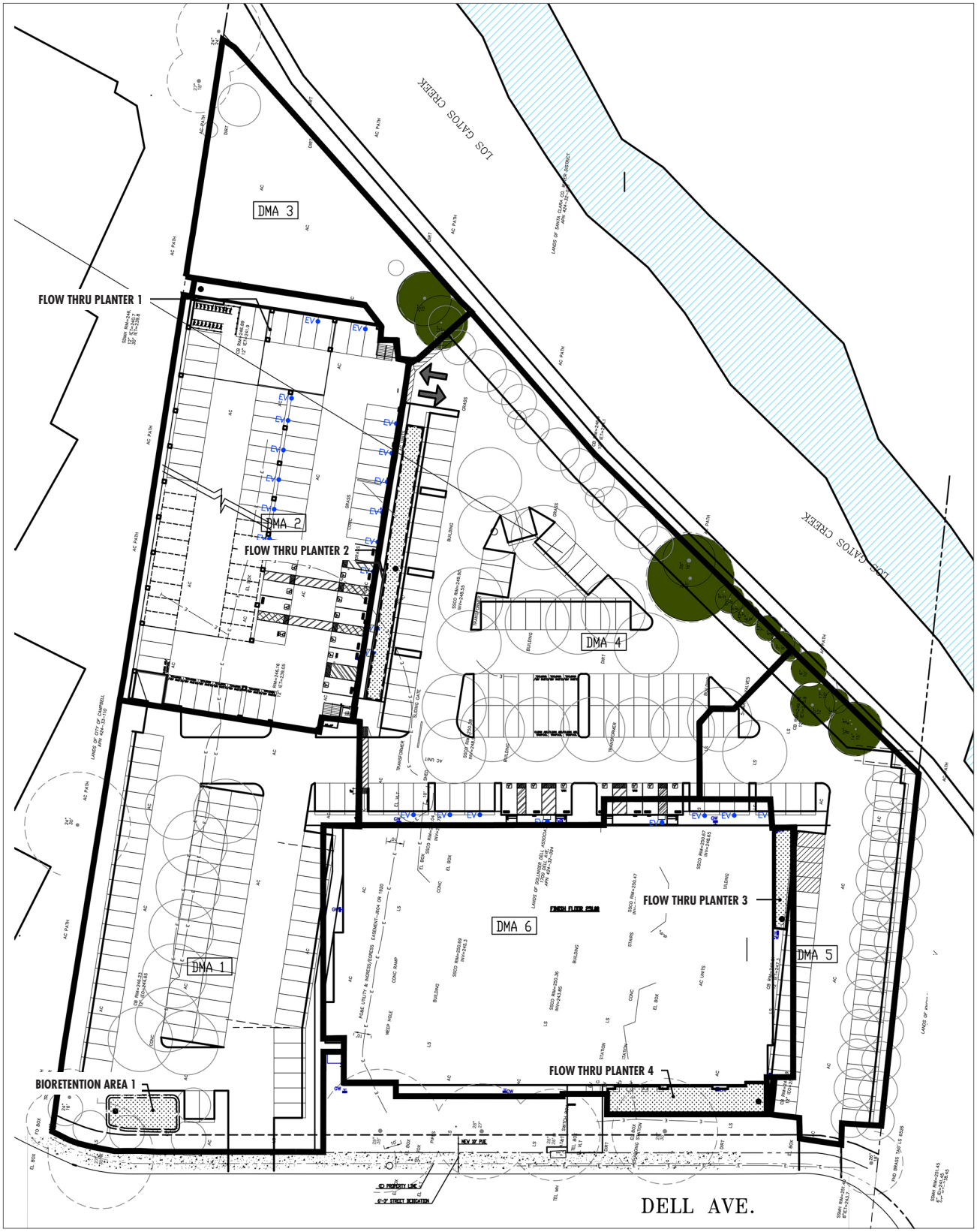
The project site is currently developed with approximately 79 percent impervious surfaces. Development of the proposed project would result in a decrease in impervious surfaces, to approximately 76 percent (refer to Table 4.8-1), and thus would be beneficial to groundwater recharge.

Free groundwater was encountered at a depth of 15 feet[27] below existing site grade during the subsurface investigation. Excavation for the parking structure would be 8 to 10 feet. Therefore, no construction dewatering is necessary.

Additionally, a well destruction report will be prepared that indicates the wells currently on-site that will be decommissioned. Upon approval of the well destruction report and issuance of a well destruction permit by the SCVWD, a licensed drilling contractor would over drill and grout the wells. The well destruction report would also be filed with the Department of Water Resources.[28]

The San Jose Water Company supplies potable water for the proposed project, of which 40 percent comes from groundwater supplies. As mentioned in Section 4.8.1.2, the SCVWD utilizes conjunctive implements a comprehensive managed recharge program maintain adequate groundwater storage, keep groundwater levels above subsidence thresholds, and maintain flow gradients. These measures would ensure that the use of groundwater for the project site would not deplete groundwater supplies.

[27] Silicon Valley Soil Engineering, November 2017, Geotechnical Investigation.
[28] Clifford Chang (Principal), November 20, 2018, Planning Comment Response 1700 Dell (Application PLV2017-381).



Source: CHANG Architecture, February 28, 2019. PlaceWorks, 2019.

0 80
Scale (Feet)

Figure 4.8-2
Stormwater Control Plan

TABLE 4.8-1 SUMMARY OF EXISTING AND PROPOSED IMPERVIOUS SURFACE AREAS

	Impervious Surfaces			
	Existing Conditions		Post-Project Conditions	
Area	Surface Area (Square Feet)	Percent of Total	Surface Area (Square Feet)	Percent of Total
Impervious Areas				
Roof Area	38,561		65,684	
Parking/Driveway	97,740		75,886	
Sidewalks and Patios	16,906		5.583	
Total, impervious areas	*153,207*	*78.9%*	*147,153*	*75.8%*
Landscaped Areas	40,914		43,739	
Pervious Paving	-		3,229	
Total, pervious areas	*40,914*	*21.1%*	*46,968*	*24.2%*
Total area	194,121		194,121	

Source: Chang Architecture, 2019, Stormwater Control Plan.

Therefore, project development would not decrease groundwater recharge, require dewatering, or overdraw groundwater reserves and the impact will be *less than significant*.

Significance without Mitigation: Less than significant.

HYDRO-3 The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.

The proposed project would not result in the direct discharge of stormwater runoff into the adjacent Los Gatos Creek; however, the proposed project would involve grading and soil exposure during construction that could result in erosion and/or siltation if not controlled. To minimize this potential impact, the project would be required to comply with all of the requirements of the State GCP, including preparation of an SWPPP prior to the start of construction activities. The SWPPP includes BMPs for runoff, erosion, and sediment transport. In addition, the project would need to comply with the City of Campbell's Municipal Code pertaining to grading and erosion control. Implementation of NPDES requirements and local City grading and excavation regulations as specified in the Municipal Code would avoid potential erosion and siltation impacts during construction.

Given the proposed development plan and flat topography of the proposed project, there is limited potential for erosion or siltation to occur once the project has been constructed. In addition, the C.3 requirements of the MS4 Permit include source control measures and site design measures that address stormwater runoff and would reduce the potential for erosion or siltation. Furthermore, Provision C.3

would require the project to implement stormwater treatment measures to contain site runoff, using specific numeric sizing criteria based on volume and flow rate.

Pursuant to the State GCP and MS4 Permit, the project would be required 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. With implementation of these erosion and sediment control measures and regulatory provisions to limit runoff, the proposed project would not result in significant increases in erosion and sedimentation.

Therefore, project development would not result in erosion or siltation due to an altered drainage pattern, and the impact will be *less than significant*.

Significance without Mitigation: Less than significant.

HYDRO-4	**The project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.**

The proposed project would take place within the boundaries of a fully developed site that is currently connected to the City's storm drain system. The proposed redevelopment does not involve the alteration of any natural drainage channels or any watercourse. The proposed project would include installation of four (4) flow-through planters and a bioretention area, as shown on Figure 4.8-2. This would collect runoff from roof tops and paved parking areas for treatment and flow control prior to discharge into the City's storm drain system.

The total proposed impervious surface area is 147,153 square feet and the proposed pervious surface area is 46,968 square feet. The proposed project drainage would result in a decrease of impervious surfaces as compared to existing conditions and thus would result in a decrease in runoff from the project site. The current site is 79 percent impervious and the proposed project would result in a reduction of impervious surfaces to 76 percent (refer to Table 4.8-1).

Stormwater runoff from the impervious area would be directed to the on-site best management practices (BMPs). Overflow runoff from the four planters would be discharged from the site through a new 15-inch storm drain that would be connected to the existing 30-inch storm drain running along the northern boundary of the site. Overflow from the bioretention area would be discharged from the site through a new 12-inch storm drain that would be connected to the same 30-inch storm drain mentioned above (see Figure 4.8-2).

Change in the timing and volume of runoff from a site is called "hydromodification." Projects are required by the MS4 Permit to comply with the hydromodification requirements if they meet the following applicability criteria:

- Create and/or replace one acre or more of impervious surface, AND
- Increase impervious surface over pre-project conditions, AND

- Are located in a susceptible area, as shown on the HM applicability map (subwatersheds that are less than 65 percent impervious).

The project would not increase impervious surface over pre-project conditions and therefore hydromodification measures are not required for the proposed project.

With implementation of site BMPs, and a reduction in the amount of impervious surfaces, the proposed project would not increase the rate or amount of surface runoff in a manner that would cause flooding. Therefore, development of the project would have a *less-than-significant* impact.

Significance without Mitigation: Less than significant

HYDRO-5 The proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

There are two potential impacts to stormwater runoff hydrology with urban development. Impervious surfaces, such as roads, sidewalks, and buildings prevent the natural infiltration of stormwater into the soil and thus create higher runoff volumes. In addition, more rapid transport of runoff over impermeable surfaces combined with higher runoff volumes result in elevated peak flows. This increase in flows could adversely impact stormwater drainage systems.

The proposed project involves construction of an office building, a five-story parking structure, and a surface parking lot on an existing developed property that is currently connected to the City's storm drain system. The proposed project would result in a reduction in the amount of impervious surfaces. Since less stormwater runoff would be discharged to the City's storm drain system as compared to existing conditions, development of the project would not result in an exceedance of the capacity of the City's storm drain system. Also, the proposed project must comply with the SCVURPPP C.3 provisions. The BMPs would provide both treatment of site runoff and flow control prior to discharge to the City's storm drain system. The treatment of stormwater runoff from the site via the flow through planters and bioretention area would minimize the potential for substantial additional sources of polluted runoff. Therefore the existing storm drain system would be able to handle the stormwater flow from the site and the impact to stormwater drainage systems or stormwater pollutant loads would be *less than significant*.

Significance without Mitigation: Less than significant

HYDRO-6 The proposed project would not otherwise substantially degrade water quality.

As discussed under impact discussion HYDRO-1, BMPs and LID measures would be implemented across the project site during both construction and operation of the proposed project. These measures 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 the SWPPP, which would minimize the release of sediment, soil, and other pollutants. Operational BMPs would be

required to meet the C.3 provisions of the MS4 Permit and 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. Additionally, both the construction and operational phases will comply with the requirements set out in the Guidelines and Standards for Land Use Near Streams. With implementation of these BMPs and LID measures in accordance with City and MS4 Permit requirements, and adherence to applicable water quality regulations, the potential impact on water quality would be *less than significant*.

Significance without Mitigation: Less than significant.

HYDRO-7	**The project 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.**

According to FEMA FIRM No 06085C0239H dated May 18, 2009, the northeast corner of the site is located in a 100-year flood zone.[29] No structures are planned for development in this area; this area would contain only parking lots and hardscape (see Figure 4.8-1). The project does not include any housing, and no structures would be placed within the 100-year floodplain. Therefore, there would be *no impact.*

Significance without Mitigation: No impact.

HYDRO-8	**The project would not place within a 100-year flood hazard area structures which would impede or redirect flood flows.**

As stated under impact discussion HYDRO-7, no buildings or housing would be placed within the 100-year floodplain. Therefore, there would be *no impact.*

Significance without Mitigation: No impact.

HYDRO-9	**The project 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 Cal OES,[30] the entire project site is within the Lenihan dam (Lexington Reservoir) and Austrian Dam (Lake Elsman) inundation zones. The dam inundation zone for Lenihan dam encompasses a large area, including most of the City of Campbell.

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

[29] Federal Emergency Management Agency, FEMA Flood Map Service Canter, https://msc.fema.gov/portal/home, accessed August 24, 2018.

[30] California Emergency Management Agency, 2007, Dam Inundation Maps DVD.

hazards as a result of dam failure. The Lexington Reservoir and Elsman Lake 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 DSOD, 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 Santa Clara County addresses the possibility of dam failure in the Operational Area 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 without Mitigation: Less than significant.

HYDRO-10 The project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow.

The project site is not in a tsunami inundation area, and there are no debris flow areas in the vicinity of the project site.

The project site is in the vicinity of a number of reservoirs, and a seiche could theoretically occur in the 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 Bay Area has not been adversely affected by seiches during its history within this seismically active region of California.[31] Therefore, seiches are not considered to represent a substantial risk for the project site, and the impact would be *less than significant*.

Significance without Mitigation: Less than significant.

4.8.3 CUMULATIVE IMPACTS

HYDRO-11 The proposed project would have a less-than-significant cumulative impact with respect to hydrology and water quality.

The geographic area for the analysis of cumulative hydrology and water quality impacts includes the areas within the City of Campbell that discharge stormwater to the same storm drain system as the project site, with ultimate discharge into the Lower San Francisco Bay. Additional projects include cumulative growth associated with City-approved projects and other foreseeable future projects. Development of approved

[31] 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.*

and future projects within the City of Campbell could increase stormwater runoff and contribute to decreased water quality in receiving waters.

The project site is located in an area that is almost completely developed with impervious surfaces and would generate stormwater runoff that is less than existing conditions with the implementation of BMPs. All new development or redevelopment projects in the City of Campbell would also be required to comply with Santa Clara County's C.3 provisions that require BMPs to be implemented. These BMPs include site design, source control, and treatment control measures that provide both flow control and treatment to runoff before it enters the storm drain system. Similarly, all projects would be required to comply with the GCP, prepare a SWPPP, and implement BMPs to minimize erosion and siltation impacts during construction.

Furthermore, future land use near the Los Gatos Creek could result in a cumulative hydrology and water quality impact to the creek. Development of approved and future projects within the City of Campbell could contribute to decreased water quality in the creek. Table 4-1 lists cumulative projects within the vicinity of the proposed project. None of these projects are located in close proximity to Los Gatos Creek and therefore none of the cumulative projects would contribute to a cumulative water quality impact to Los Gatos Creek.

When applicable, any new development within the City would be subject, on a project-by-project basis, to the applicable level of independent CEQA review as well as design guidelines, Municipal Code requirements, and other applicable City policies and procedures that reduce impacts related to hydrology and water quality. New projects would also be subject to review by the City's Public Works Department to ensure that stormwater discharge from the sites would not exceed the capacity of the City's storm drain system. Projects close to Los Gatos Creek will also need to meet permitting requirements set by SCVWD for land uses near streams. For these reasons, impacts of the proposed project and approved and/or future projects on hydrology and water quality are not cumulatively considerable and the cumulative impact would be *less than significant*.

Significance without Mitigation: Less than significant.

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4.9 LAND USE AND PLANNING

This chapter describes the land use character of the project site and its vicinity and evaluates the potential environmental impacts that could occur by implementing the proposed project. This chapter begins with a summary of the relevant regulatory setting and existing conditions, followed by a discussion of the proposed project and cumulative 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 project site vicinity.

Regional Regulations

Plan Bay Area 2040

The Association of Bay Area Governments (ABAG) is the regional planning agency and council of governments for the nine-county San Francisco Bay Area, which includes Santa Clara County and the City of Campbell. The Metropolitan Transportation Commission (MTC) and ABAG's *Plan Bay Area 2040* is the Bay Area's Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). *Plan Bay Area 2040* was prepared by MTC in partnership with ABAG, the Bay Area Air Quality Management District, and San Francisco Bay Conservation and Development Commission and adopted on July 26, 2017.[1] 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 emissions from transportation (excluding goods movement) beyond the per capita reduction targets identified by California Air Resources Board. An overarching goal of *Plan Bay Area 2040* is to concentrate development in areas where there are existing services and infrastructure rather than allocate new growth to outlying areas where substantial transportation investments would be necessary to achieve the per capita passenger vehicle miles traveled and associated greenhouse gas emissions reductions. The project site is located within a Transit Priority Area (TPA) by Plan Bay Area.[2] SB 375 defines a TPA as a lot or area within a half mile of a major transit stop or within one-quarter of a mile of high-quality transit corridors, which includes planned rail stations in an adopted Regional Transportation Plan.[3] The project site is within one-half mile of two light rail stations planned as part of the Santa Clara Valley Transportation Authority's light rail extension project. Plan Bay Area identifies TPA zones with the goal of locating land uses that would not

[1] Association of Bay Area Governments, 2017, Plan Bay Area 2040, http://2040.planbayarea.org/, accessed on November, 15, 2018.

[2] Metropolitan Transportation Commission, Association of Bay Area Governments, https://www.planbayarea.org/pda-tpa-map, accessed on July 30, 2018.

[3] Metropolitan Transportation Commission, Association of Bay Area Governments, 2017, Plan Bay Area: Final Land Use Modeling Report.

substantially increase automobile traffic, and will instead decrease automobile transit and allow for promotion of public and active transportation.

Habitat Conservation Plans

The project site is not in a habitat conservation plan or natural communities conservation plan designated by the United States Fish and Wildlife Service or California Department of Fish and Wildlife.[4,5]

Local Regulations

City of 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 resources. The Land Use and Transportation Element was updated in August of 2014. 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

General Plan Policies

Key policies and strategies of the General Plan relevant to the proposed project 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. The project site has a General Plan land use designation of Research and Development, as shown on Figure 3-3 in Chapter 3, Project Description, of this Draft EIR. The Research and Development designation allows for campus-like environments for corporate headquarters, research and development facilities, and offices. Such supported uses are research facilities, testing, packaging, publishing and printing.[6]

[4] US Fish and Wildlife Service, 2016, Habitat Conservation Plans in Pacific Southwest Region of US Fish and Wildlife Service, data layer on Data Basin maintained by Conservation Biology Institute, https://databasin.org/maps/bcd7a710c93743a48b4b29231dfdc158/active, accessed August 14, 2018.

[5] California Department of Fish and Wildlife, 2017, Natural Community Conservation Planning: Plan Summaries, https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans, accessed August 14, 2018.

[6] City of Campbell, 2011, The City of Campbell General Plan, page LUT-11.

TABLE 4.9-1 GENERAL PLAN GOALS, POLICIES, AND STRATEGIES PERTAINING TO LAND USE AND PLANNING

Goal/Policy/ Strategy Number	Goal/Policy/Strategy Text
Goal LUT-5	*Preservation and enhancement of the quality character and land use patterns that support the neighborhood concept.*
Policy LUT-5.1	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	Maintain a variety of attractive and convenient commercial and office uses that provide needed goods, services and entertainment.
Strategy LUT-5.3b	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.
Goal LUT-9	*A compatible land use pattern citywide.*
Policy LUT-9.1	Establish a compatible land use pattern citywide
Strategy LUT-9.1c	Permit only those uses that are compatible with land use objectives and redevelopment plans.
Policy LUT-9.3	Promote high quality, creative design and site planning that is compatible with surrounding development, public spaces and natural resources
Strategy LUT-9.3d	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-9.3g	Incorporate pedestrian amenities such as plazas, landscaped areas with seating, pedestrian walkways into new developments.

Source: City of Campbell, 2001, City of Campbell General Plan.

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, Article, and Chapter. The following provisions of the Municipal Code implement the goals and policies of the General Plan.

Zoning Code

Title 21 of the Municipal Code sets forth the Campbell Zoning Code. The Zoning Code 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, policies, and strategies 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 project site and surrounding area are zoned Controlled Manufacturing (C-M) as shown in Figure 3-4 in Chapter 3, Project Description, of this Draft EIR.

The C-M zoning district is intended to provide for development and protection of specialized manufacturing, packaging, printing, publishing, testing, and research and development. Building forms

should be campus-like in nature. Such facilities shall be maintained in a clean and quiet manner, and shall meet landscaping and other standards identified in the Zoning Code.[7]

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 Planned Development application is subject to Section 21.42.030 of the Campbell Municipal Code, as discussed below.

Planned Development Review

As described in Chapter 3, Project Description, a zone change from C-M to Planned Development (P-D) is part of the application request. The P-D district allows for flexibility not permitted in other zoning districts. Projects within a P-D zoning district may utilize flexibility such as increased density, height exceptions, or parking exceptions in exchange for high-quality design and materials, and the provision of an optimum quantity and use of open space areas for public and private use. Municipal Code Section 21.12.030 outlines the following process to rezone a parcel to the P-D zoning district:[8]

- Permits. A Zoning Map Amendment is required for a zone change to a P-D designation, while a Planned Development permit is required for any development on a P-D zoned parcel. An application for a Planned Development permit shall be accompanied by a fully dimensional site plan, floor plan and elevations, as well as any other materials or data deemed necessary by the Community Development Department. If approved, the project shall comply with the full development plan as approved or conditioned by the decision-making body.
- Filing. All permit applications shall be filed with the Community Development Department and shall be accompanied with the applicable filing fees. If Planning Commission or City Council review is required there may be additional application filing requirements necessary to evaluate the project.
- Review Considerations. The following considerations are made by the Community Development Director, the Site and Architectural Review Committee, the Planning Commission, and the City Council when reviewing project applications and permits:
- Traffic and Circulation. With regard to site circulation, traffic congestion, and traffic safety, the City shall consider: the effect of the site development plan on traffic conditions on abutting streets; the layout of the site with respect to locations and dimensions of vehicular and pedestrian entrances, exit driveways, and walkways; the arrangement and adequacy of off-street parking facilities to prevent traffic congestion; the location, arrangement, and dimensions of truck loading and unloading facilities; the circulation patterns within the boundaries of the development; and the surfacing and lighting of the off-street parking facilities.

[7] City of Campbell, 2018, Campbell Municipal Code Section 21.10.070, https://library.municode.com/ca/campbell/codes/code_of_ordinances?nodeId=TIT21ZO_ART2ZODI, accessed August 14, 2018.

[8] City of Campbell, 2018, Campbell Municipal Code Section 21.12.030, https://library.municode.com/ca/campbell/codes/code_of_ordinances?nodeId=TIT21ZO_ART2ZODI, accessed August 14, 2018.

- Landscaping. With regard to landscaping, the City shall consider: The location, height, and material offences, walls, hedges, and screen plantings to ensure harmony with adjacent development or to conceal storage areas, utility installations, and other unsightly aspects of the development' the planting of groundcover or other surfacing to prevent dust and erosion; and the preservation of existing healthy trees.
- Structure and Site Layout. With regard to structure and site layout, the City shall consider: consideration of the general silhouette and mass, including location on the site, elevations, and relation to natural plant coverage, all in relationship to the surrounding neighborhood; consideration of exterior design in relation to adjoining structures in terms of area, bulk, height, openings, and breaks in the facade facing the street; and consideration of the appropriateness and compatibility of the proposed uses in relation to the adjacent uses and the area as a whole.
- Approval. The reviewing authority may approve the Planned Development application if the proposed development would: clearly would result in a more desirable environment and use of land than would be possible under any other zoning district classification; be compatible with the general plan and will aid in the harmonious development of the immediate area; not result in allowing more residential units than would be allowed by other residential zoning districts which are consistent with the general plan designation of the property; and not be detrimental to the health, safety or welfare of the neighborhood or of the city as a whole.

4.9.1.2 EXISTING CONDITIONS

The project site is an approximately 4.5-acre site located along the southern edge of the City of Campbell. The site is located at the intersection of Knowles Drive and Dell Avenue, and is bounded by Los Gatos Creek to the east. The site currently contains a 71,620-square-foot office building and a surface parking lot. The existing building is irregularly shaped and has areas that are single story, two stories, and three stories.

Figure 3-2 in Chapter 3, Project Description, of this Draft EIR shows the immediate vicinity of the project site. The property is in a commercial area of Campbell containing a mix of commercial, office, and light industrial uses to the north, west, and south. To the east of the project site lies Los Gatos Creek and the adjacent Los Gatos Creek Trail.

4.9.2 IMPACT DISCUSSION

4.9.2.1 STANDARDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as

the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in Section 4.9.2.2 uses the following standards of significance. The proposed project would result in a significant land use and planning 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 project (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. In combination with past, present, and reasonably foreseeable projects, result in significant cumulative impacts with respect to land use and planning.

4.9.2.2 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance as identified in Section 4.9.2.1 above.

LU-1	**The proposed project would not physically divide an established community.**

The introduction of new development or infrastructure projects can adversely affect the physical cohesion of an established community. Examples of projects that can divide neighborhoods include freeway projects, rail alignments, and road closures. Community division can impede mobility, wayfinding, and community identity. The proposed project would replace an existing office building with a new office building and parking garage. The proposed site plan would reconfigure the placement of structures on the site by replacing a building surrounded by surface parking with a building that is oriented along the street frontage with parking located behind the building. A new garage is proposed on the northeastern portion of the site. Because the proposed project would not physically divide the area or affect the street network, the impact of the proposed development would be *less than significant.*

Significance without Mitigation: Less than significant.

LU-2	**The proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (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.**

Plan Bay Area 2040

The proposed project is consistent with the overall regional policy framework of *Plan Bay Area 2040* because it would redevelop a site with existing services and infrastructure, is within an urbanized area (instead of in the region's undeveloped periphery), would locate jobs near housing and transit, and would

not displace existing housing or residents. Additionally, the proposed office project is similar in use to the commercial, office, and industrial businesses located in the vicinity, is adjacent to active transportation infrastructure, and is within 0.25 miles of the nearest public transportation line, which is consistent with the goals of the Plan Bay Area designated Transportation Priority Areas. The project site's proximity to the Los Gatos Creek Trail and public transportation routes accommodates the travel needs of potential employees and customers who access the site via walking, cycling, or public transportation. Therefore, the project would be consistent with *Plan Bay Area 2040* and the impact would be *less than significant*.

General Plan and Zoning

The project consists of 4.5-acres of urbanized land within the City of Campbell. The General Plan designation for the project site is Research and Development, which permits campus-like environments for corporate headquarters, research and development facilities, and offices. The proposed office use is permitted under the General Plan designation.

The proposed project is subject to applicable land use and planning policies of the Campbell General Plan, listed in Table 4.9-1, including Goal LUT-5 to preserve and enhance the quality character and land use patterns that support the neighborhood concept; Policy LUT-5.1 to 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 neighborhood; and Policy LUT-5.3 to maintain a variety of attractive and convenient commercial and office uses that provide needed goods, services and entertainment. The proposed project is also subject to Goal LUT-9 and Policy LUT-9.1 to establish a compatible land use pattern citywide; Strategy LUT-9.1c to permit only those uses that are compatible with land use objectives and redevelopment plans; Policy LUT-9.3 to promote high quality, creative design and site planning that is compatible with surrounding development, public spaces and natural resources; Strategy LUT-9.3d to 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; and Strategy LUT-9.3g to incorporate pedestrian amenities such as plazas, landscaped areas with seating, pedestrian walkways into new developments.

The proposed project would be consistent with Policies LUT-5.3 and LUT-9.1 in that an office use is consistent with the uses allowed in the Research and Development land use designation of the site. The proposed project would also be consistent with Policies LUT-5.1 and LUT-9.3 in that the proposed building materials are generally consistent with the overall urban character of the surrounding office developments. The building would also be oriented to the street and provide massing that would engage pedestrians, which is consistent with Strategies LUT-5.3b and LUT-9.3d. Site design would also include public open space in the northeast portion of the project site, with landscaped areas surrounding the site, and a renovated walkway to the creek on the southern boundary of the site, which would meet the requirements of Strategy LUT-9.3g. Based on this consistency analysis, the proposed project would not conflict with land use and planning General Plan policies.

The existing zoning district for the project site is Controlled Manufacturing (C-M). The proposed building height of 60 feet (plus 12 additional feet of mechanical screening), exceeds the maximum permitted building height of 45 feet in the C-M zone while the proposed floor-area ratio (FAR), 0.83, exceeds the maximum permitted FAR of 0.4 in the C-M zone. However, the project includes a request for a zone

change to Planned Development (P-D) to allow for flexible development standards as discussed earlier in this Report.

To be granted a P-D permit, the proposed project must be consistent with Municipal Code Section 21.12.030, which lists the approval criteria for a P-D permit. The following project characteristics are compliant with the requirements for approval of a P-D permit, as outlined above in Section 4.9.1.1 above. Therein this regard, the project is anticipated to be found consistent with the findings for approval of a P-D permit, as follows:

- The proposed project would include additional open space than is currently on-site.
- The proposed project and zoning change would be consistent with General Plan Land Use Policies LUT-5,1, LUT-5.3, LUT-9.1, and LUT-9.3, as discussed in the previous section.
- The proposed project does not include any residential units, and thus would not add more residential units than in other residential zoning districts.
- The demolition, construction, and operation of the office building, parking garage, and open space in the proposed project would not be detrimental to the health, safety, or welfare of the neighborhood or city.

Based upon the above discussion, the City Council could approve the requested Planned Development zone change if the City Council finds that the proposed project is consistent with the City's General Plan and all other applicable land use plans, policies, and regulations. In this regard, the land use and planning impact would be *less than significant*.

Significance without Mitigation: Less than significant.

LU-3 The proposed project would not conflict with any applicable habitat conservation plan or natural community conservation plan.

The project site is not in the plan area of an applicable habitat conservation plan or natural community conservation plan, including the Santa Clara Valley Habitat Plan.[9,10] The Habitat Plan Permit Area includes Los Gatos Creek and the Los Gatos Creek Trail, which abuts the east side of the project site, but excludes the remainder of the City of Campbell, including the project site (see Figure 4.3-1 in Chapter 4.3, Biological Resources, of this Draft EIR). As no habitat conservation plans apply to the proposed project, there would be *no impact*.

Significance without Mitigation: No impact.

[9] US Fish and Wildlife Service, 2016, Habitat Conservation Plans in Pacific Southwest Region of US Fish and Wildlife Service, data layer on Data Basin maintained by Conservation Biology Institute, https://databasin.org/maps/bcd7a710c93743a48b4b29231dfdc158/active, accessed August 8, 2018.

[10] California Department of Fish and Wildlife, 2017, Natural Community Conservation Planning: Plan Summaries, https://wildlife.ca.gov/Conservation/Planning/NCCP/Plans, accessed June 5, 2018.

4.9.3 CUMULATIVE IMPACTS

LU-4 The proposed project would not result in significant cumulative impacts with respect to land use and planning.

While development of a single project may not be significant in impacting the land use of an area, several concurrent developments in the same area of a city could constitute a significant cumulative effect. This analysis of cumulative impacts to land use and planning is based on the list of five related projects presented in Table 4-1 in Section 4, Environmental Analysis, of this Draft EIR. The related projects range from 0.3 to 2.3 miles from the project site.

As discussed above, and if the requested entitlements are approved (e.g., P-D zoning), the proposed project would not conflict with any applicable land use plans, policies, or regulations. In addition, the proposed project would not physically divide an existing community, nor would the proposed project conflict with an adopted conservation plan. Approval of the cumulative projects by the City of Campbell and surrounding jurisdictions would be contingent on those projects either conforming to existing zoning and General Plan land use regulations for those sites, or obtaining approval of zone changes and/or General Plan amendments. The proposed project is approximately 0.3 miles away from the nearest cumulative project and would not divide the existing neighborhood, and thus would not cumulatively affect neighborhood cohesion and connectivity. The project, along with other projects near Dell Avenue, would not create a cumulative impact because the proposed project would not degrade connectivity within the Dell Avenue neighborhood. One cumulative project, the Samaritan Medical Campus Development, is within the Santa Clara Valley Habitat Plan Permit Area; however, the proposed project would not contribute to any potential cumulative impacts because it is not within the Santa Clara Valley Habitat Plan Permit Area. Therefore, cumulative impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

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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 project site, evaluates the potential impacts that could occur as a result of implementation of the proposed project, and details mitigation measures needed to reduce significant impacts. The technical data and modeling used to for the analysis in this section are located in Appendix H, Technical Noise Data and Modeling.

4.10.1 GLOSSARY

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 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, energy averaged over the measurement period.
- **L_{max}.** The maximum root-mean-square noise level during a 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 is 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) 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. Note: 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 therefore in this assessment.

- Peak Particle Velocity (PPV). The peak rate of speed at which soil particles move (e.g., inches per second) due to ground vibration.
- RCNM: Federal Highway Administration Roadway Construction Noise Model.

4.10.2 ENVIRONMENTAL SETTING

4.10.2.1 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 activates or uses in the project area; therefore, this analysis addresses only State and local standards.

State Regulations

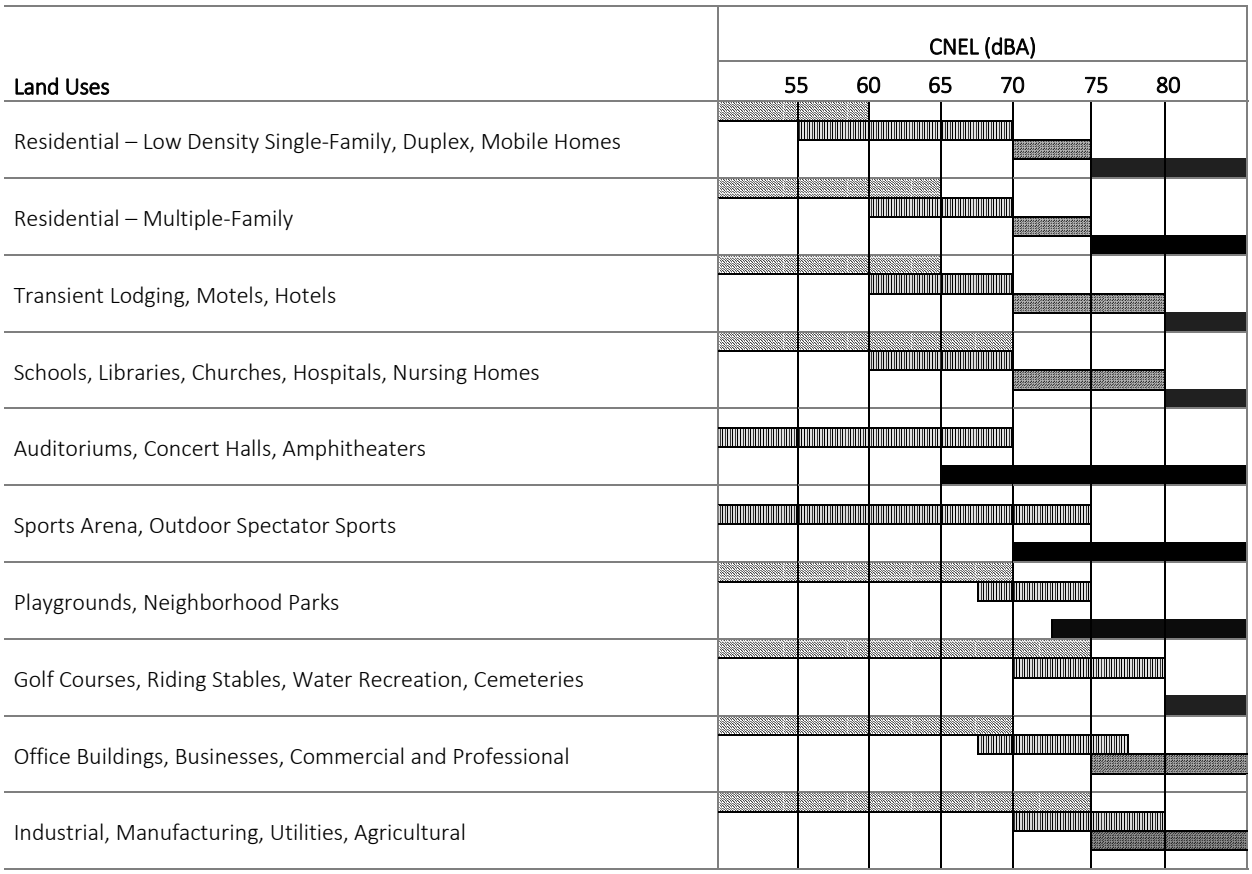
The California Office of Noise Control has prepared a land use compatibility chart for community noise to provide urban planners with a tool to gauge the compatibility of land uses relative to existing and future ambient noise levels. This land use compatibility chart identifies "normally acceptable," "conditionally acceptable," and "clearly unacceptable" noise levels for various land uses. A conditionally acceptable designation implies that 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 4.10-1 for reference.

Local Regulations

2001 Campbell General Plan

The Conservation and Natural Resources Element of the 2001 Campbell General Plan 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 noise goals, policies, and strategies applicable to the proposed project from the General Plan Conservation and Natural Resources Element are included in Table 4.10-2.

TABLE 4.10-1 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.

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.

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.

Clearly Unacceptable:
New construction or development generally should not be undertaken.

Source: Governor's Office of Planning and Research, 2003, General Plan Guidelines 2003.

TABLE 4.10-2 CITY OF CAMPBELL GENERAL PLAN NOISE GOALS, POLICIES, AND STRATEGIES APPLICABLE TO THE PROPOSED PROJECT

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-10.1d	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).

Source: City of Campbell, 2001, *City of Campbell General Plan*.

City of Campbell Municipal Code

The provisions of the Campbell Municipal Code relevant to the proposed project are listed below.

- Section 21.16.070(E)(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.
- Section 21.16.070(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.
  - 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.
- 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]

Town of Los Gatos Municipal Code

As described in Section 4.10.1.2, the sensitive receptors nearest to the project site are located within the town limits of Los Gatos. Therefore, the Town of Los Gatos' noise standards are also relevant to the project. The relevant provisions of the Los Gatos Code of Ordinances are listed below.

- Section 16.20.015 Exterior noise levels for residential zones. No person shall cause, make, suffer or allow to be made by any machine, animal, device or any combination of same in a residential zone, a noise level more than six (6) dB above the noise level specified for that particular noise zone, as shown on the Noise Zone Map, during that particular time frame, at any point outside of the property plane.
- Section 16.20.035 Construction. Notwithstanding any other provision of this chapter, between the hours of 8:00 a.m. to 8:00 p.m., weekdays and 9:00 a.m. to 7:00 p.m. weekends and holidays, construction, alteration or repair activities which are authorized by a valid Town permit or as otherwise allowed by Town permit, shall be allowed if they meet at least one of the following noise limitations:

  (1) No individual piece of equipment shall produce a noise level exceeding eighty-five (85) dBA at twenty-five (25) feet. If the device is located within a structure on the property, the measurement shall be made at distances as close to twenty-five (25) feet from the device as possible.

  (2) The noise level at any point outside of the property plane shall not exceed eighty-five (85) dBA.

4.10.2.2 EXISTING CONDITIONS

The proposed project is located outside the 60 dBA CNEL noise contour as shown in the General Plan's Traffic Related Noise Conditions Under General Plan Buildout Contour Map and based on Table CNR-2 of the General Plan. Existing noise conditions at the project site are mainly influenced by traffic on highways and roadways, commercial industrial operations, and, to a lesser extent, aircraft activity.

[1] McCormick, Cindy. Senior Planner, City of Campbell. Personal correspondence between Joshua Carman, PlaceWorks. November 14, 2018. Per discussions with City staff, the intention of this portion of the code is intended to prevent—to the greatest extent possible—the use of non-standard construction equipment, loud stereos, or equipment that is not appropriately muffled, and not to overall construction noise, in general, during allowable hours.

The nearest sensitive receptors are residences outside the City of Campbell located on the opposite side of Los Gatos Creek approximately 275 feet south of the project boundary on Mozart Way in the Town of Los Gatos. The nearest sensitive receptors in the City of Campbell are residences located approximately 1,200 feet northwest of the project boundary.

4.10.3 IMPACT DISCUSSION

4.10.3.1 STANDARDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in Section 4.10.3.2 uses the following standards of significance. The proposed project would result in a significant noise impact if it would cause:

1. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
2. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.
3. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
4. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
5. 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, would the project expose people residing or working in the project area to excessive noise levels.
6. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.

4.10.3.2 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance as identified in Section 4.10.3.1 above.

NOISE-1	**The proposed project would not cause exposure of people to, or generation of, noise levels in excess of standards established in the General Plan or the Municipal Code, and/or the applicable standards of other agencies.**

A significant stationary source would occur if the activities or equipment at the proposed project site produce noise levels at nearby sensitive receptors in excess of local regulations.

Project Operational Noise

The proposed project could introduce new stationary noise sources to the project vicinity such as, people gathering and conversing in the proposed open space area in the northeast corner of the site and rooftop mechanical equipment. Potential traffic noise impacts are addressed under impact discussion NOISE-3.

Typical conversation between people talking within three feet from one another is approximately 65 dBA. At a distance of approximately 330 feet from the proposed open space area to the nearest receptors (residences) on Mozart Way in the Town of Los Gatos, noise levels would attenuate to approximately 24 dBA and are not anticipated to be audible. Noise levels from the open space area are predicted to be more than 20 dBA below the ambient noise level shown on the Town's Noise Zone Map of 48 dBA for this location.

The exterior mechanical and heating, venting, and air conditioning (HVAC) equipment associated with the proposed project is expected to be similar to the equipment used in the surrounding commercial buildings. Typical HVAC units generate noise levels ranging up to 75 dBA at a distance of 10 feet. Current site plans show the closest proposed building approximately 350 from the residences on Mozart Way. At this distance, the noise level associated with project mechanical equipment noise would attenuate to approximately 44 dBA. This noise level would not be 6 dBA above the noise level shown on the Town's Noise Zone Map of 48 dBA for this location and would, therefore, not exceed the standard of 54 dBA set by Town of Los Gatos.

At a distance of 1,200 feet or greater to the nearest receptors (residences) in the City of Campbell, noise associated with project mechanical equipment and the proposed open space would attenuate to approximately 33 dBA or less, which would not be audible above the existing ambient noise levels in an urban environment. This would be a *less-than-significant* impact.

Construction Noise

The total duration for project construction would be approximately one and a half years beginning in January of 2020 and ending in June of 2021. Construction would consist of the following proposed construction activities; demolition, site preparation, grading, building construction, paving, and architectural coating. Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul and (2) stationary-source noise from use of construction equipment.

Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along site access roadways. Individual construction vehicle pass-bys may create momentary noise levels of up to approximately 85 dBA (Lmax) at 50 feet from the vehicle, but given that these occurrences would generally be infrequent and short lived, noise impacts from construction vehicles would be *less than significant*.

Construction Equipment

Noise generated by on-site construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each stage of construction involves different types of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest several pieces of equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels in excess of 80 to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on what specific activity is being performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dB per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and/or shielding/scattering effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements. Noise levels from project-related construction activities were calculated from the simultaneous use of the three loudest pieces of construction equipment during a given phase at spatially averaged distances (i.e., from the acoustical center of the general construction site) to the property line of the nearest receptors using the Federal Highway Administration Roadway Construction Noise Model (RCNM). Although construction may occur across the entire phase area, the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors.

The demolition, site preparation, grading, and paving phases are estimated to generate the loudest average construction noise levels of up to 68 dBA Leq at the nearest residences to the south in the Town of Los Gatos at approximately 400 feet as measured from the center of the construction site. Nearby commercial uses are not considered sensitive receptors. The loudest piece of equipment anticipated for use during any of the construction phases would be a concrete saw during the demolition phase. No pile driving is proposed as part of the project. Noise levels from the use of a concrete saw and pavement removal equipment could reach up to 75 dBA Lmax a at a distance of 275 feet (the distance from the project site boundary to the nearest residences to the south). Noise levels due to construction would not exceed the Town of Los Gatos' noise standard of 85 dBA. As discussed above, per the City of Campbell Municipal Code, 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. However, without best management practices such as ensuring that all equipment is adequately muffled and that unnecessary idling is prohibited, this impact would be considered *significant*.

Significance without Mitigation: Significant.

Impact NOISE-1: The project would not cause exposure of persons to or generation of noise levels in excess of standards established in the City of Campbell's and Town of Los Gatos' General Plan or Municipal Code, or applicable standards of other agencies. However, Mitigation Measure NOISE-1 is recommended to ensure that feasible measures, such as those included in the Municipal Code, are instated to minimize construction noise impacts.

Mitigation Measure NOISE-1: The project sponsor shall incorporate the following practices into the construction contract agreement documents to be implemented by the construction contractor during the entire construction phase of the project:

- The project sponsor and contractors shall prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the permit application drawing set and as part of the construction drawing set.
- At least 21 days prior to the start of construction activities, all off-site businesses and residents within 300' of the project site shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the City's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the City.
- During the entire active construction period, equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible.
- Require the contractor to use impact tools (e.g., jack hammers and hoe rams) that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- During the entire active construction period, stationary noise sources shall be located as far from sensitive receptors as possible, and they shall be muffled and enclosed within temporary enclosures or insulation barriers to the extent feasible.
- Select haul routes that avoid the greatest amount of sensitive use areas.

- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level, or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.

Significance with Mitigation: Less than significant.

NOISE-2 The proposed project would not cause exposure of people to, or generation of, excessive groundborne vibration or groundborne noise levels.

Vibration Standards

The City of Campbell Municipal Code has set forth vibration standards under Section 21.16.090 stating 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. Vibrations from temporary construction, demolition, and vehicles that enter and leave the subject parcel (e.g., construction equipment, trains, trucks, etc.) are exempt.

Vibration during Construction

Construction activities generate varying degrees of ground vibration, depending on the construction procedures, construction equipment used, and proximity to vibration-sensitive uses. The generation of vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels. Table 4.10-3 lists reference vibration levels for different types of commonly used construction equipment.

TABLE 4.10-3 VIBRATION SOURCE LEVELS FOR COMMON CONSTRUCTION EQUIPMENT

Equipment	Peak Particle Velocity (in/sec) at 25 Feet
Vibratory Roller	0.210
Small Bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large Bulldozer	0.089

Source: Federal Transit Administration, 2018.

The term “architectural damage” is defined as minor surface cracks (in plaster, drywall, tile, or stucco) or the sticking of doors and windows. This is below the severity of “structural damage” which entails the compromising of structural soundness or the threatening of the basic integrity of the building shell. Building damage is typically not a concern for most projects, with the occasional exception of blasting and pile driving during

construction.[2] Construction of the proposed project would not require blasting, pile driving, or hard rock ripping/crushing activities.

Since vibration-induced architectural damage could result from an instantaneous vibration event, distances are measured from the building façade to the nearest location of potential construction activities. For reference, a peak particle velocity (PPV) of 0.2 inches per second (in/sec) is used as the limit for "non-engineered timber and masonry buildings" (which would conservatively apply to the surrounding structures).[3] Construction equipment such as bulldozers, as shown in Table 4.10-3, generates vibration levels less than 0.1 in/sec PPV at 25 feet away. As shown in Table 4.10-3, construction-generated vibration levels would be less than the 0.2 in/sec PPV vibration damage criteria beyond about 25 feet. Since there are no buildings within 25 feet of proposed construction activity, impacts related to architectural damage due to construction vibration would be *less than significant* without mitigation. In addition, vibration from temporary construction is exempt from the Municipal Code standards.

Significance without Mitigation: Less than significant.

NOISE-3 The proposed project would not cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the proposed project.

As presented in impact discussion NOISE-1, project-generated operational noise from stationary noise sources (i.e. mechanical systems) would not result in a substantial permanent increase in ambient noise levels.

With respect to project-related increases, noise impacts can be put into three categories. The first is "audible" impacts, which refer to increases in noise level that are perceptible to humans. Audible increases in general community noise levels generally refer to a change of 3 dBA or more since this level has been found to be the threshold of perceptibility in exterior environments. The second category, "potentially audible" impacts, refers to a change in noise level between 1 and 3 dBA. The last category includes changes in noise level of less than 1 dBA that are typically "inaudible" to the human ear except under quiet conditions in controlled environments. Only "audible" changes in noise levels at sensitive receptor locations (i.e., 3 dBA or more) are considered potentially significant. Note that a doubling of traffic flows (i.e., 10,000 vehicles per day to 20,000 per day) would be needed to create a 3 dBA increase in traffic-generated noise levels. An increase of 3 dBA is often used as a threshold for a substantial increase.

The peak hour traffic volumes along roadways in the project area provided in Appendix I, Transportation Impact Study, were used to determine the permanent traffic noise level increase due to implementation of the proposed project. This analysis compares the Existing plus Project peak hour traffic volumes to the Existing traffic volumes logarithmically to estimate the project increase. The permanent noise level increase was estimated to be 0.64 dBA or less throughout all study roadway segments. Since the

[2] Federal Transit Administration, 2018, Transit Noise and Vibration Impact Assessment Manual.
[3] Federal Transit Administration, 2018, Transit Noise and Vibration Impact Assessment Manual.

permanent noise level increase due to project-generated traffic would be less than 3 dBA, the proposed project would not cause a substantial permanent noise level increase at surrounding noise-sensitive receptors. Under Cumulative plus Project conditions, the permanent noise level increase is estimated to be 1.1 dBA, which also would not exceed 3 dBA and would not be perceptible. This is a *less-than-significant* impact. Appendix H includes the traffic noise increase calculations.

Significance without Mitigation: Less than significant.

NOISE-4	**The proposed project would cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.**

As presented in impact discussion NOISE-1, project-related construction noise would temporarily increase ambient noise levels in the project vicinity. This would be considered a *significant* impact.

Significance without Mitigation: Significant.

Impact NOISE-4: The project would cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity, which would result in a *significant* impact.

Mitigation Measure NOISE-4: Implement Mitigation Measure NOISE-1.

Significance with Mitigation: Less than significant.

NOISE-5	**The proposed project would not cause exposure of people residing or working in the vicinity of the study 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 project area is not located within an airport land use plan and project development would not expose people on-site to excessive airport-related noise levels. There would be *no impact*.

Significance without Mitigation: No impact.

NOISE-6	**The proposed project would not cause exposure of people residing or working in the project site to excessive noise levels, for a project within the vicinity of a private airstrip.**

The project area is not located within the vicinity of a private airstrip. As such, development of the project would not expose people on-site to excessive noise levels from aircraft at private airstrips and *no impact* would occur.

Significance without Mitigation: No impact.

4.10.4 CUMULATIVE IMPACTS

NOISE-7 The proposed project would not result in a significant cumulative impact with respect to noise.

If the construction of the project were to overlap with cumulative projects in the project site vicinity, noise could combine to result in significant cumulative impacts. However, the closest planned and approved construction project (Medical Office Buildings – 250 East Hacienda Avenue) is located over 1,500 feet from the project. At this distance, cumulative impacts would be no greater than those described in Impact NOISE-1. Therefore, the project would not contribute to a significant cumulative noise impact from construction noise.

A significant cumulative traffic noise increase would be identified if project traffic were calculated to contribute 1 dBA or more under Cumulative plus Project conditions to a significant traffic noise increase over existing conditions. That is, if a cumulative traffic noise increase of greater than the 3 dBA significance threshold of perceptibility is calculated, and the relative contribution from project traffic is calculated to contribute 1 dBA or more to this cumulative impact, it would be considered cumulatively considerable. As discussed above under impact discussion NOISE-3, under Cumulative Plus Project conditions, the permanent traffic noise level increase is estimated to be 1.1 dBA, which also would not exceed 3 dBA and would not be perceptible.

As discussed, in impact discussion NOISE-1, non-traffic operational noise sources such as mechanical equipment would comply with the requirements of the Municipal Code. The noise level associated with project mechanical equipment noise would attenuate to approximately 44 dBA and would be below the existing ambient noise level at the nearest residence, which is approximately 48 dBA according to the Town's Noise Zone Map. Noise from stationary sources is highly localized and the cumulative development projects are far enough away from the project site such that the project would not contribute to a cumulative increase in noise in the project vicinity. Therefore, this is a *less-than-significant* impact.

Significance without Mitigation: Less than significant.

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4.11 POPULATION AND HOUSING

This chapter describes the regulatory framework and existing conditions on the project site related to population and housing, and the potential impacts of the project on population and housing.

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 project. There are no federal regulations regarding population and housing that are applicable to the proposed project.

State Regulations

California Housing Element Law[1] includes provisions related to the requirements for housing elements of local government General Plans. These requirements 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, local jurisdictions must 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 produces growth forecasts so that other regional agencies, including the Metropolitan Transportation Commission (MTC) and the Bay Area Air Quality Management District, 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 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.

[1] Government Code Sections 65580 through 65589.8.

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 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. ABAG calculates the RHNA for individual jurisdictions within Santa Clara County, including Campbell.

Plan Bay Area 2040

MTC and ABAG's *Plan Bay Area 2040* is the Bay Area's Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). *Plan Bay Area 2040* was prepared by MTC in partnership with ABAG, the Bay Area Air Quality Management District, and San Francisco Bay Conservation and Development Commission and adopted on July 26, 2017.[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 emissions from transportation (excluding goods movement) beyond the per capita reduction targets identified by California Air Resources Board. In 2008, MTC and ABAG initiated a regional effort (FOCUS) to link local planned development with regional land use and transportation planning objectives, and *Plan Bay Area 2040* reinforced the focus growth strategy. Through this initiative, local governments identified Priority Development Areas (PDAs). The PDAs form the implementing framework for *Plan Bay Area 2040.* The PDAs are existing neighborhoods served by public transit and have been identified for additional, compact 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 77 percent (or over 629,000 units) of new housing and 55 percent (or 707,000) of new jobs.[3]

There is one PDA within the City of Campbell: the Central Redevelopment Area 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 housing units and 2,340 new jobs by 2040 within its PDA.[4] The project site is not within a PDA.

Local Regulations

City of Campbell General Plan

The City of Campbell's 2001 General Plan contains several policies relevant to population and housing. There is one policy (Policy LUT-2.4) that specifically addresses maintaining a jobs and housing balance

[2] Association of Bay Area Governments, 2017, Plan Bay Area 2040, http://2040.planbayarea.org/, accessed on November, 15, 2018.

[3] Metropolitan Transportation Commission and Association of Bay Area Governments, 2013, Final Plan Bay Area, Strategy for a Sustainable Region.

[4] Metropolitan Transportation Commission and Association of Bay Area Governments, 2013, Final Plan Bay Area, Strategy for a Sustainable Region, Appendices A and B.

within the City of Campbell. The policy calls for maintaining Campbell's balance of jobs and housing units to encourage residents to work in Campbell, and to limit the overall impact on the regional transportation system that may be caused by population increase.[5]

City of Campbell 2015-2023 Housing Element

The City's Housing Element, adopted in February 2015, is part of the City's General Plan but is updated on a different cycle, consistent with State law. The City's 2015-2023 Housing Element 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 the vicinity of the proposed project. 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 Housing Element analyses housing opportunity sites through six housing opportunity site areas located throughout the city in areas that have potential to construct housing for very-low-, low- and/or 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 population as of January 2018 is 42,696, which is a 0.75 percent increase over the 2017 population of 42,373.[6] Campbell has an average household size of 2.5 persons, compared to 3.0 persons per household for Santa Clara County as a whole.[7]

As shown in Table 4.11-1, ABAG predicts that the population in Campbell is projected to grow to a 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 2018, Campbell had 17,868 housing units, with a 5.0 percent vacancy rate.[8] Of those units, approximately 58 percent are single-family homes, approximately 39 percent are multi-family units, and approximately 2 percent are mobile homes.

[5] City of Campbell, 2001, City of Campbell General Plan, Policy LUT-2.4, page LUT-46.

[6] State of California, Department of Finance, Report E-5, Population and Housing Estimates for Cities, Counties, and the State, 2011-2018 with 2010 Census Benchmark.

[7] State of California, Department of Finance, Report E-5, Population and Housing Estimates for Cities, Counties, and the State, 2011-2018 with 2010 Census Benchmark.

[8] State of California, Department of Finance, Report E-5, Population and Housing Estimates for Cities, Counties, and the State, 2011-2018 with 2010 Census Benchmark.

TABLE 4.11-1 ABAG PROJECTIONS 2013 POPULATION, HOUSEHOLDS, AND EMPLOYMENT FORECASTS FOR CAMPBELL

							Change 2015-2040	
	2015	2020	2025	2030	2035	2040	Number	Percent
Total Population	40,600	41,900	43,100	44,800	46,400	48,100	7,500	18.47%
Households	16,700	17,250	17,780	18,340	18,880	19,440	2,740	16.41%
Household Size	2.42	2.42	2.42	2.43	2.44	2.46	0.04	1.65%
Total Jobs	29,410	31,690	32,400	33,120	34,110	35,170	5,760	19.59%
Employed Residents	21,770	23,410	23,790	24,180	24,850	25,540	3,770	17.32%
Jobs/Employed Residents Ratio	1.35	1.35	1.36	1.37	1.37	1.38	0.03	2.22%

a. Calculated by dividing total jobs by employed residents.
Source: Association of Bay Area Governments, 2013, Projections 2013.

Employment

As shown above in Table 4.11-1, there were 21,770 employed residents in Campbell in 2015, and ABAG expects this number to grow by 17.3 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 2015. This ratio is expected to increase slightly by 2040 to 1.38 jobs per employed resident.

4.11.2 IMPACT DISCUSSION

4.11.2.1 STANDARDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in Section 4.11.2.2 uses the following standards of significance. The proposed project 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.

4.11.2.2 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance as identified in Section 4.11.2.1 above.

POP-1	**The proposed project would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).**

The proposed project would result in a significant impact related to population growth if it would lead to substantial unplanned growth, either directly or indirectly. As a non-residential project, the proposed project would not directly generate any additional housing units. The proposed project is a redevelopment of an existing office building, which will double the size of the existing structure. Overall, employment capacity of the site is expected to increase, and it is expected that future employees will include current residents of the City of Campbell in addition to employees living outside of the city. No residential units exist or are proposed on the project site. Therefore, the proposed project would not directly induce population growth. The project would have the potential to indirectly increase housing needs, as discussed below.

As described above, ABAG and MTC have responsibility for regional planning in the nine-county Bay Area, which includes the project site. ABAG and MTC have developed regional growth forecasts for the Bay Area as a whole and for constituent jurisdictions. Table 4.11-1 shows population, housing, and employment projections for the study area that are included in the regional forecasts. As shown in the table, ABAG projects that an additional 5,760 jobs could be added in the city between 2015 and 2040. Based on an employment generation ratio of 1 employee per 225 square feet of the building area, the proposed project would result in about 719 jobs. This is well within the ABAG projections. Therefore, the project would not exceed regional growth projections.

The employment opportunities created by the project could indirectly increase the city's population, if future employees move to Campbell. It is unknown how many future employees may move to Campbell to work at the project site. However, given the size of the project, indirect population growth created by the project's employment opportunities would fall well within ABAG projections.

The project site is served by utility and transportation infrastructure and, therefore, implementation of the proposed project would not extend utilities to a new area of the city or require significant off-site infrastructure improvements that may generate indirect population growth. Therefore, the proposed project would not indirectly induce substantial growth through the extension of roads or other new infrastructure that would lead to additional growth within the city. Accordingly, indirect impacts related to substantial population growth would not be significant.

Therefore, the proposed project would not directly or indirectly induce population growth in the city, and the impact would be *less-than-significant.*

Significance without Mitigation: Less than significant.

POP-2 The proposed project would not displace substantial numbers of existing housing units, necessitating the construction of replacement housing elsewhere.

The project site does not include any housing that would be displaced as part of the proposed project. In addition, the project site is designated and zoned for industrial and office use, and is not included as a housing site in the City's Housing Element. Therefore, there would be *no impact* related to displacement of on-site housing.

Significance without Mitigation: No impact.

POP-3 The proposed project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

As described under impact discussion POP-2, the project site does not contain any on-site housing or residents who would be displaced as part of the proposed project. The proposed project would demolish the existing office building, which would displace current employees on-site. However, the project would result in a net increase in the number of office jobs on-site, which would create a net increase in employment opportunities on-site. Therefore, there would be a *less-than-significant* impact related to displacement of people.

Significance without Mitigation: Less than significant.

4.11.3 CUMULATIVE IMPACTS

POP-4 The proposed project would not result in significant cumulative impact with respect to population and housing.

As discussed in Chapter 4.0, Environmental Analysis, the approved North Forty Specific Plan 0.5 miles to the southeast and the proposed Cresleigh Homes Mixed-Use Development 1.9 miles to the northeast of the project site includes 270 and 59 housing units, respectively. In addition, as described in Section 4.11.1.2 and shown in Table 4.11-1, population and housing in Campbell is projected to increase over the next 15 to 20 years. However, as described in impact discussion POP-1, the proposed project does not include any residential development that would directly induce population growth, nor would it indirectly induce population growth. The project site contains an existing office building and would therefore displace existing workers but would not have the potential to displace any existing housing units or residents. The displacement of existing on-site employees would be temporary as the project would result

in a net increase in on-site jobs. Therefore, the project would not result in or contribute to a significant cumulative impact to population and housing, and cumulative impacts would be *less than significant.*

Significance without Mitigation: Less than significant.

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4.12 PUBLIC SERVICES AND RECREATION

This chapter describes public services provided in the project vicinity and evaluates the potential impacts to public services that could result from development of the project. In each section, a summary of the relevant regulatory setting and existing conditions are followed by a discussion of project-specific and cumulative impacts.

This chapter covers the following public services:

- Fire Protection
- Police
- Schools
- Libraries
- Parks and Recreation Facilities

4.12.1 FIRE PROTECTION SERVICES

This section describes the current fire protection regulations, resources, and response times for fire protection services in the City of Campbell.

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 project.

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 2015 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. The 2016 CBC went into effect January 1, 2017. The 2019 CBC goes into effect starting January 1, 2020.

California Fire Code

The California Fire Code (CFC) incorporates, by adoption, the 2015 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 California Code of Regulations Title 24. The CFC is revised and published approximately every three years by the California Building Standards Commission. The proposed project is categorized in the CFC under Assembly Group A-2, which includes such uses as banquet halls, casinos, taverns and bars, night clubs, and restaurants. The A-2 occupancy group requires having an active sprinkler system on the interior of any establishment, with specific requirements based on square footage, internal occupancy load, and fire size. The 2016 CFC went into effect January 1, 2017. The 2019 CFC goes into effect starting January 1, 2020.

Local Regulations

City of Campbell General Plan

The City of Campbell General Plan, adopted on November 6, 2001, contains policies in the Health and Safety Element 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, 2001, City of Campbell General Plan.

City of Campbell Municipal Code

The Campbell Municipal Code, organized by Title, Article, and Chapter, 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 (Building Codes and Regulations) 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 protection and emergency medical services (EMS) 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 EMS.
- **Support Services Division:** The Support Services Division is responsible for all vehicle, facility, and communication services.

Staffing and Facilities

There are 300 SCCFD employees, with daily staffing of 66 firefighters and officers operating out of its 15 fire stations.[1] SCCFD equipment includes 21 staffed pieces of equipment per day, such as fire trucks and command vehicles.[2] The fire suppression staff includes approximately 25 trained volunteer firefighters.[3] The two stations located within the City of Campbell are the Sunnyoaks Fire Station and the Campbell Fire Station, 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 SCCFD. The station equipment consists of Engine 80 and Reserve Engine 180.[4] The Sunnyoaks Fire Station is located approximately 0.9 miles north of the project site. The Sunnyoaks Fire Station would be the station to service the proposed project.[5]
- **Station 11–Campbell Fire Station:** Located at 123 Union Avenue, this facility is owned by the City of Campbell and leased by the SCCFD. The station equipment consists of Engine 81 and Reserve Truck 181.[6] The Campbell Fire Station is located approximately 2 miles northeast of the project site.

These two stations are responsible for fire services for a population of approximately 42,000 people in the City of Campbell. If one of the fire engines is dispatched to an emergency, the next closest available unit responds. Additionally, if any engine from either station is dispatched to a fire, the SCCFD will "cover" the Sunnyoaks or Campbell Fire Station so that there is coverage in Campbell at all times.[7]

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, as well as mutual aid agreements with every department within Santa Clara County. Each agency has specified how many pieces of apparatus and what kind can be

[1] Santa Clara County Fire Department, 2015, Business Plan, January 2015-December 2019, page 20.

[2] Glass, Brian, Acting Deputy Chief of Operations, Santa Clara County Fire Department. Personal communication with Torina Wilson, PlaceWorks. July 24, 2018.

[3] Santa Clara County Fire Department, 2015, Business Plan, January 2015-December 2019, page i.

[4] Santa Clara County Fire Department, 2015, Business Plan, January 2015-December 2019, page 32.

[5] Glass, Brian, Acting Deputy Chief of Operations, Santa Clara County Fire Department. Personal communication with Torina Wilson, PlaceWorks. July 24, 2018.

[6] Santa Clara County Fire Department, 2015, Business Plan, January 2015-December 2019, page 32.

[7] Stocksick, Debbie, Operations Captain, Santa Clara County Fire Department. Personal communication with Travis Bradley, PlaceWorks. July 29, 2014.

offered so that no one agency will unreasonably deplete its own resources in furnishing mutual aid during extraordinary events.[8]

Average Response Times

The performance goal for structure fires is to have an effective firefighting force on scene in less than 8 minutes from dispatch, at least 85 percent of the time. The average response time to structure fires in metropolitan and urban areas within Campbell in 2017 was 7 minutes and 52 seconds. The performance goal for medical calls is for the first unit to arrive on scene with a paramedic in less than 7 minutes, at least 90 percent of the time.[9] The average response time for rescue and EMS calls in urban areas of Santa Clara County is approximately 7.5 minutes.[10]

Facilities Planning

The 2015-2019 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 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 EMS.

The primary source of the SCCFD's funding is from property taxes and fire service contracting. The SCCFD receives two percent of all taxable property taxes annually.[11] 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.[12] The SCCFD's fixed fees for fire code permitting, review, and inspection are current as of August 20, 2012.[13] In Fiscal Year 2017, the SCCFD had a total of $113 million, and spent $101 million,[14] which gave it a budget surplus for the following fiscal year. According to Campbell Fire Staff, there are currently no plans to expand or construct new facilities.[15]

4.12.1.2 IMPACT DISCUSSION

Standards of Significance

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance

[8] Stocksick, Debbie, Operations Captain, Santa Clara County Fire Department. Personal communication with Travis Bradley, PlaceWorks. July 29, 2014.

[9] Santa Clara County Fire Department, 2018, 2017 Annual Report.

[10] Santa Clara Fire Department. 2017. Santa Clara County Fire Department 2017 Annual Report.

[11] Santa Clara County Fire Department, 2010, Business Plan, January 2010-December 2014, pages 7-8.

[12] Santa Clara County Fire Department, 2013, 2012 Annual Report.

[13] 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 November 22, 2013.

[14] Santa Clara County Fire Department, 2018, 2017 Annual Report.

[15] Glass, Brian, Acting Deputy Chief of Operations, Santa Clara County Fire Department. Personal communication with Torina Wilson, PlaceWorks, July 24, 2018.

with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in the Impact Analysis below uses the following standards of significance:

> The proposed project 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.

Impact Analysis

The following impact discussion analyzes the project's impact using the standards of significance as identified in the Standards of Significance above.

PS-1	**The proposed project would not result in the 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.**

A significant environmental impact could result if implementation of the proposed project would increase demand for fire protection services to the extent that the construction of new or physically altered fire protection facilities would be needed.

The proposed project would increase demand for fire protection services that would be accommodated by the SCCFD. The Campbell General Plan includes policies and strategies that would ensure adequate fire protection services are available for the residents of Campbell. Under Policy HS-2.3, Fire and Emergency Medical Services, the City would ensure that fire protection and EMS 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.

The proposed development would also be required to comply with the City's Fire Code per Municipal Code Title 17 (Fire Protection), including compliance with permit processes and requirements for emergency access, hazardous material handling, and fire protection systems (including automatic sprinkler systems, fire extinguishers, and fire alarms).

The SCCFD has confirmed that the existing facilities, equipment, and staffing levels would be adequate to accommodate the proposed project, and no additional facilities are proposed at this time.[16] Additionally, compliance with the CFC and local regulations, and continuation of SCCFD's planning processes, would ensure that the proposed project would have a *less-than-significant* impact on the need for additional future fire facilities.

Significance without Mitigation: Less than significant.

4.12.1.3 CUMULATIVE IMPACTS

PS-2	**The proposed project would result in less-than-significant cumulative impacts with respect to fire protection services.**

The methodology used for the cumulative impact analysis is described in Chapter 4.0, Environmental Analysis, of this Draft EIR. The cumulative setting for fire protection services takes into account growth resulting from the proposed project, in combination with growth projected by the Association of Bay Area Governments (ABAG) in the service area of the SCCFD, which includes the communities of Campbell, Cupertino, Los Altos, Los Altos Hills, Los Gatos, Monte Sereno, and Saratoga. 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.

As described above, the proposed project 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. The SCCFD assesses its ability to service Campbell and neighboring cities through its 2015-2019 SCCFD Business Plan and 2014-2019 SCCFD Strategic Plan, which address planning for adequate equipment and facilities and identifying service demand growth patterns. All development in the SCCFD would be required also to comply with the CBC and CFC. The Samaritan Medical Campus Development cumulative project is within the City of San José, which is served by City of San José Fire Department. The proposed project is not served by the City of San José Fire Department, and therefore would not cause cumulative impacts to fire services.

As stated under impact discussion PS-1, the SCCFD has indicated that the existing facilities, equipment, and staffing levels would be adequate to accommodate the proposed project, and no additional facilities are proposed at this time. Therefore, the cumulative impact on the provision of fire services would be *less than significant*.

Significance without Mitigation: Less than significant.

[16] Glass, Brian, Acting Deputy Chief of Operations, Santa Clara County Fire Department. Personal communication with Torina Wilson, PlaceWorks, July 24, 2018.

4.12.2 POLICE SERVICES

This section describes the current police protection regulations, resources, and response times in Campbell, as well as the proposed project'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.

Policies and strategies in the Health and Safety Element of the Campbell General Plan 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, 2001, City of Campbell General Plan.

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 SCCFD for fire and medical emergency services. All emergency and public safety issues (police, fire, and 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 SCCFD. The CPD is primarily comprised of three major divisions:[17]

- 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.

[17] City of Campbell, http://www.ci.campbell.ca.us/253/Police-Department, accessed August 1, 2018.

Staffing and Facilities

The CPD headquarters is located at 70 North First Street in Campbell, approximately 2 miles northeast of the project site. The Department has 70 full-time employees. The Field Services Division is staffed by 20 police officers, 4 police agents, and 4 police sergeants.[18] The Investigative Services Unit of the Special Enforcement Division is comprised of one sergeant and five investigators and is managed by the Special Enforcement Division Captain.[19] Additionally, an investigator from the Investigative Service Unit is assigned to the Santa Clara County Specialized Enforcement Team 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.[20] Additional staff makes up the Communications Unit, Records Unit, and Property/Evidence Unit of the Support Services Division.[21] A total of 46 officers are employed by the CPD, which equates to a staffing ratio of slightly more than one sworn police officer to every 1,000 residents.[22]

Average Response Times

In 2017, CPD handled approximately 35,000 calls for service, wrote 5,474 police reports, and made approximately 2,093 arrests.[23] 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 2017, the CPD was able to meet this target 97 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 95 percent success rate for non-emergency calls in 2017.[24]

Facilities Planning

The City of Campbell currently has a need to improve police facilities given the deteriorated state of the existing facilities. The existing police facility at 70 North 1st Street lacks specific amenities for current policing practices and is the facilities are not seismically safe. A measure on the ballot in November of 2018 approved a bond to raise money to construct a new police facility and city library. The City of Campbell Police Department has adequate staffing to serve current City demand, and demand anticipated to increase in the coming few years.[25]

[18] City of Campbell, https://www.ci.campbell.ca.us/245/Field-Services, accessed on August 1, 2018.
[19] City of Campbell, https://www.ci.campbell.ca.us/281/Investigative-Services, accessed August 1, 2018.
[20] City of Campbell, https://www.ci.campbell.ca.us/282/Traffic, accessed August 1, 2018.
[21] City of Campbell, http://www.ci.campbell.ca.us/253/Police-Department, accessed July 30, 2014
[22] Cefalu, Joe, Captain, City of Campbell Police Department. Personal communication with Torina Wilson, PlaceWorks, August 1, 2018.
[23] Campbell Police Department, 2017, 2017 Year in Review.
[24] Cefalu, Joe, Captain, City of Campbell Police Department, Personal communication with Torina Wilson, PlaceWorks., August 1, 2018.
[25] Cefalu, Joe, Captain, City of Campbell Police Department, Personal communication with Torina Wilson, PlaceWorks., August 1, 2018.

4.12.2.2 IMPACT DISCUSSION

Standards of Significance

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in the Impact Analysis below uses the following standards of significance:

> The proposed project 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.

Impact Analysis

The following impact discussion analyzes the project's impact using the standards of significance as identified in the Standards of Significance above.

PS-3	**The proposed project would not result in 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.**

A significant environmental impact would result if implementation of the proposed project would increase demands for police protection services to the extent that the construction of new or physically altered police facilities would be needed.

Because it would increase the employee population of the project site, the proposed project could potentially increase demand for police protection services to the project site. However, the CPD has confirmed that future development allowed by the proposed project would not, by itself, contribute to the need for expansion or addition of facilities.[26] The CPD has already identified a need for an improved and expanded headquarters and is pursuing funding for a new facility. The need for this facility would exist

[26] Cefalu, Joe, Captain, City of Campbell Police Department. Personal communication with Torina Wilson, PlaceWorks, August 1, 2018.

with or without the proposed project. Future construction or expansion of police facilities would be subject to separate project-level CEQA review in order to identify potential environmental impacts and mitigation measures as needed.

Based on the assessment of the CPD, the proposed project would have a *less-than-significant* impact with respect to the need for new or physically altered police protection facilities.

Significance without Mitigation: Less than significant.

4.12.2.3 CUMULATIVE IMPACTS

PS-4 The proposed project would result in less-than-significant cumulative impacts with respect to police services.

The methodology used for the cumulative impact analysis is described in Chapter 4.0, Environmental Analysis, of this Draft EIR. The cumulative setting for police protection services takes into account growth caused by the proposed project, 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 ability of the CPD to adequately serve its service area, thereby requiring construction of new facilities or modification of existing facilities. CPD has indicated that, existing and future development would not have a cumulative impact on police services and would not require new facilities to adequately serve new development. Moreover, a new police station is already being planned to accommodate current and future needs of the City, which would ensure that adequate police services are provided without causing substantial environmental impacts.

Two cumulative projects, the North Forty Specific Plan and the Samaritan Medical Campus Development Plan, are located outside of Campbell in Los Gatos and San José, respectively. The North Forty Specific Plan area is served by the Los Gatos Monte Sereno Police Department and was determined to have no impact on the existing police services in Los Gatos.[27] The Samaritan Medical Campus Development Plan is served by the San José Police Department and was determined to not cause an expansion of the police department in the 2016 EIR.[28] Due to proposed project location in Campbell, there would not be cumulative impacts on the Los Gatos Monte Sereno Police Department or the San José Police Department.

As stated above, CPD has confirmed that new or physically altered facilities would not be needed to serve development allowed by the proposed project. [29] Therefore, growth caused by the proposed project would not make a considerable contribution to any cumulative impact to police services in or beyond Campbell, and the proposed project would have a *less-than-significant* cumulative effect with respect to police protection services.

[27] EMC Planning Group Inc., 2014, North Forty Specific Plan Draft EIR.

[28] City of San José, 2016, Environmental Impact Report Samaritan Medical Center Master Plan.

[29] Cefalu, Joe, Captain, City of Campbell Police Department. Personal communication with Torina Wilson, PlaceWorks, August 1, 2018.

Significance without Mitigation: Less than significant.

4.12.3 SCHOOLS

This section describes the existing regulations and conditions with regard to schools serving Campbell, as well as the proposed project'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 project.

State Regulations

Senate Bill 50

Senate Bill (SB) 50[30] (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 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. 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 Assembly Bill (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.[31] The agency must also demonstrate a reasonable relationship between the fee

[30] SB 50, approved in 1998, is different legislation than SB 50 as currently proposed by the State Legislature.

[31] California Government Code, Sections 66000-66008, https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=66000, accessed August 1, 2018.

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

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. Policy OSP-8.1 states: "Education. Support efforts by the Campbell Union and Moreland School Districts to maintain and enhance existing educational opportunities."

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 project site.

Campbell Union School District

The CUSD serves the entire City of Campbell, as well as surrounding areas, 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 $0.36 per square foot for commercial and industrial development.[32]

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. The CUHSD collects development impact fees, which fund improvements and new facilities to mitigate impacts from new developments. Development fees are $1.14 per square foot for residential development and $0.183 per square foot for commercial development.[33]

4.12.3.2 IMPACT DISCUSSION

Standards of Significance

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency

[32] Campbell Union High School District, https://www.cuhsd.org/apps/pages/developer_fees, accessed August 1, 2018.
[33] Campbell Union High School District, https://www.cuhsd.org/apps/pages/developer_fees, accessed August 1, 2018.

uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in the Impact Analysis below uses the following standards of significance:

> The proposed project would have a significant impact related to schools if, in order to maintain acceptable service ratios or other performance objectives, the proposed project 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.

Impact Analysis

The following impact discussion analyzes the project's impact using the standards of significance as identified in the Standards of Significance above.

PS-5	**The proposed project would not result in the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.**

Development of the proposed project would not include any housing that would generate new students or increase the need for local school facilities. Development of the proposed project would require payment of commercial developer impact fees to the school districts that serve the project site. The payment of school fees is deemed to fully mitigate the impacts of new development on school facilities, per SB 50. Therefore, there would be *no impact* on the need for school facilities.

Significance without Mitigation: No impact.

4.12.3.3 CUMULATIVE IMPACTS

PS-6	**The proposed project would result in less-than-significant cumulative impacts with respect to school services.**

The proposed project would not generate any new students and would pay commercial developed impact fees. Therefore, the project would not contribute to cumulative impacts with respect to school services and there would be *no impact*.

Significance without Mitigation: No impact.

4.12.4 LIBRARIES

This section describes the existing regulations and conditions regarding library services in Campbell, as well as the proposed project'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 project.

State Regulations

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

Santa Clara County Library Strategic Plan, 2008

The Santa Clara County Library District (SCCLD) adopted the Santa Clara County Library Strategic Plan on October 23, 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.[34]

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 4.12-3.

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

[34] Santa Clara County Library District, 2008, Santa Clara County Library District Strategic Plan.

TABLE 4.12-3 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, 2001, City of Campbell General Plan.

the SCCLD's member cities, Campbell has a community library located on 77 Harrison Avenue, located approximately 1.9 miles northeast of the project site.

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 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.[35]

The Campbell Community Library has enough capacity to serve the existing population of Campbell, and has room to accommodate growth in the coming years. Although the size of the facility is adequate for the current and near-future population of Campbell, the existing library facility does not meet earthquake, safety, and ADA standards, and the infrastructure within the building is not sufficient for the needs of a library. Campbell Community Library will start constructing a new facility at 1344 Dell Avenue. Future construction or expansion of library facilities would be subject to separate project-level CEQA review in order to identify potential environmental impacts and mitigation measures as needed. A ballot measure, in conjunction with the Campbell Police Department, was approved in November 2018, the approval of which provides funding for a new library facility that is seismically safe.[36]

[35] Santa Clara County Library District, http://sccl.evanced.info/signup/list?ag=729%2c727%2c728%2c731%2c725%2c730&kw=storytime&df=list&private=0&do=1&nd=60&ln=2, accessed August 1, 2018.

[36] Griffen, Chuck, Financial and Administrative Services Director, Santa Clara County Library District. Personal communication with Torina Wilson, PlaceWorks, July 27, 2018.

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, property within the SCCLD is also assessed for enhanced service through a Community Facilities District. In addition, the SCCLD receives many gifts of money, equipment, books, and time from friends of the library as well as from residents of the county.[37]

4.12.4.2 IMPACT DISCUSSION

Standards of Significance

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in the Impact Analysis below uses the following standards of significance:

> The proposed project would result in a significant impact if, in order to maintain acceptable service ratios or other performance objectives, the proposed project 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.

Impact Discussion

The following impact discussion analyzes the project's impact using the standards of significance as identified in the Standards of Significance above.

PS-7	**The proposed project would not result in the need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.**

Development allowed by the proposed project would not increase the number of residents or housing in the SCCLD's service area. It is possible that the 719 new employees at the proposed project site would use

[37] Griffen, Chuck, Financial and Administrative Services Director, Santa Clara County Library District, Personal communication with Travis Bradley, PlaceWorks, July 23, 2014.

the library and would therefore represent a slight increase in demand on library services provided at the Campbell Community Library. However, because it is expected that at least some of the future employees of the project would be existing residents of Campbell and surrounding communities, it is not anticipated that all new employees would represent new residents or users of Campbell and its services. Based on consultation by the SCCLD, the proposed project is not expected to add any additional strain on the existing Campbell Community Library capacity.[38]

A development plan to construct a new library facility is already proposed.

The City of Campbell has one policy and three strategies pertaining to libraries, as listed in Table 4.12-3. Policy OSP-7.1 focuses on library facilities and ensuring that those facilities offer adequate services for the residents of Campbell to have opportunities to obtain knowledge and information. This policy is implemented through three strategies that focus on provisions of library services, library outreach services, and funding sources. Strategy OSP-7.1a ensures coordination within the Santa Clara County Library System, Strategy OSP-7.1b encourages library outreach services within the system for seniors and disabled who cannot visit library facilities, and Strategy OSP-7.1c promotes coordination with the system to provide funding for library facilities and activities include County, State, federal, corporate, and private contributions. The proposed project would be consistent with these policies and strategies as it would not increase the number of residents or housing in the SCCLD's service area. Therefore, a *less-than-significant* impact would occur with respect to the need for new or physically altered library facilities.

Significance without Mitigation: Less than significant.

4.12.4.3 CUMULATIVE IMPACTS

PS-8	**The proposed project would result in less-than-significant cumulative impacts with respect to the construction of other public facilities.**

The methodology used for the cumulative impact analysis is described in Chapter 4.0, Environmental Analysis, of this Draft EIR. This section analyzes potential impacts to library services that could occur from development allowed by the proposed project in combination with reasonably foreseeable growth in the SCCLD service area. The proposed project, in conjunction with the cumulative projects within and outside of Campbell, would increase demands on library services. However, SCCLD is already planning for a new library to accommodate current and future needs in Campbell, which would ensure that adequate library services are provided without causing substantial environmental impacts. A library was recently constructed in the Town of Los Gatos to accommodate the increase in patrons from the North Forty Specific Plan Area. The Samaritan Medical Center Master Plan would not impact library services within the City of San José. Moreover, future construction or expansion of library facilities would be subject to separate project-level CEQA review in order to identify potential environmental impacts and mitigation measures as needed. Finally, the potential increase in demand generated by new employees at the

[38] Griffen, Chuck, Financial and Administrative Services Director, Santa Clara County Library District, Personal email communications with Torina Wilson, PlaceWorks, July 27, 2018.

proposed project site would not be a considerable contribution to any cumulative impact on library services.

As a result, a *less-than-significant* cumulative impact associated with libraries would occur.

Significance without Mitigation: Less than significant.

4.12.5 PARKS AND RECREATION FACILITIES

This section describes the regulatory framework and existing conditions related to parks and recreation in Campbell, as well as the proposed project'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 project.

State Regulations

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.[39] 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 1,000 persons. 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.

[39] 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, accessed August 31, 2018.

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.[40]

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 4.12-4.

TABLE 4.12-4 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-3.2	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, 2001, City of Campbell General Plan.

[40] City of Campbell, 2001, City of Campbell General Plan EIR, page 214.

City of Campbell Municipal Code

The Campbell Municipal Code, organized by Title, Article, and Chapter contains all ordinances for the city. Title 13 of Campbell Municipal Code sets regulations and standards for parks and recreation facilities and buildings in the city. 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.

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 and other public agencies own and operate 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. 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.

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.[41] 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 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.

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.

[41] City of Campbell, 2001, City of Campbell General Plan EIR, page 214.

Los Gatos Creek Trail

The Los Gatos Creek Trail runs from San José 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, 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. The project site is located directly to the west of the Los Gatos Creek Trail.[42]

4.12.5.2 IMPACT DISCUSSION

Standards of Significance

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in the Impact Analysis below uses the following standards of significance. The proposed project 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.

Impact Analysis

The following impact discussion analyzes the project's impact using the standards of significance as identified in the Standards of Significance above.

[42] City of Campbell, Facilities, http://www.ci.campbell.ca.us/Facilities/Facility/Details/Los-Gatos-Creek-Trail-29, accessed August 1, 2018.

PS-9	**The proposed project would not result in the need for new or physically altered park facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives.**

Development of the proposed project would not include new permanent residents that could increase the demand for the parks and recreational facilities in the city. It is likely that the employees of the proposed office building will utilize Campbell parks and recreational facilities, including the adjacent Los Gatos Creek County Park. However, the proposed project includes the construction of a public open space area, which will be an on-site amenity that is expected to reduce the employee use of the Los Gatos Creek County Park and Trail. This publicly accessible on-site amenity would be adjacent to the Los Gatos Creek Trail and would be available for trail users to enjoy.[43] This open space area will include picnic benches, pavers, and shade trees, in addition to other landscaping improvements and benches along the border of the site adjacent to the Los Gatos Creek Trail. The number of employees that may use the trail is small in comparison to the number of people that currently use the trail. Therefore, the project would not generate a need to physically alter or construct new facilities and impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

PS-10	**The proposed project 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.**

Development of the proposed project would not include new permanent residents that could increase the demand for the parks and recreational facilities in the city. It is possible that some or all of the 719 employees at the proposed project site could utilize public parks and recreational facilities in Campbell, including the Los Gatos Creek County Park and Los Gatos Creek Trail. However, this number of new users represents a small increase in comparison to the approximately 43,000 residents and approximately 30,000 workers that are currently served by local facilities. Therefore, the increase in potential park users from the proposed project would not result in the need for new or physically altered park facilities, and impacts would be *less than significant*. No mitigation measures are required.

Significance without Mitigation: Less than significant.

PS-11	**The proposed project would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.**

[43] While project plans show the on-site open space area as having a direct connection to the Los Gatos Creek Trail, the City will require, as a condition of approval, that this connection be removed, as the Santa Clara Valley Water District has requested that no new connections be constructed between the project site and the trail.

As described under impact discussion PS-10, development of the proposed project would not include new permanent residents that could increase the demand for the parks and recreational facilities in the city. While some or all of the 719 employees at the project site could utilize public recreational facilities, including the Los Gatos Creek County Park and Los Gatos Creek Trail, this number of new users is small in comparison to the number of current users of local facilities. Therefore, the increase in potential recreational facility users from the proposed project would not result in the need for new or physically altered recreational facilities, and impacts would be *less than significant*. No mitigation measures are required.

Significance without Mitigation: Less than significant.

4.12.5.3 CUMULATIVE IMPACTS

PS-12 The proposed project would result in less-than-significant cumulative impacts with respect to parks.

The methodology used for the cumulative impact analysis is described in Chapter 4.0, Environmental Analysis, of this Draft EIR. The cumulative setting for parks and recreation facilities takes into account growth resulting from the proposed project, in combination with growth projected by the Association of Bay Area Governments (ABAG) in the City of Campbell and in nearby communities that may use park or recreational facilities within Campbell City limits. A significant cumulative environmental impact would result if this cumulative growth would exceed the ability of the Campbell Parks Department to adequately serve its service area, thereby requiring construction of new facilities or modification of existing facilities.

As described above, the proposed project would not create a need for new or physically altered park or recreational facilities. The proposed project does not include a residential component, and will not significantly impact the number of people accessing and using parks or recreational facilities. Three cumulative projects, including the Medical Office Buildings, Samaritan Medical Campus Development Plan, and the Office Building on 95 East Hamilton Avenue do not include residential development and would not create a need for new or physically altered park or recreational facilities. The North Forty Specific Plan and the Cresleigh Homes Mixed-Use Development would add residential units to the area. However these residents would not significantly impact parks and recreational facilities to the point where new or physically altered recreational facilities are needed. Therefore, growth caused by the proposed project and cumulative projects would not make a considerable contribution to any cumulative impact parks and recreational facilities in or beyond Campbell, and the proposed project would have a *less-than-significant* cumulative effect.

Significance without Mitigation: Less than significant.

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4.13 TRANSPORTATION AND TRAFFIC

This chapter describes the regulatory framework, existing and potential impacts of the project on transportation and traffic. The analysis in this section is based in part on the *Traffic Impact Study for 1700 Dell Avenue*, prepared by W-Trans in March 2019, and referred to herein as the TIA (Transportation Impact Analysis). A complete copy of this traffic study is in the technical appendix to this Draft EIR (Appendix I).

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 project's consistency with the applicable regulatory conditions.

Federal Regulations

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 study 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 in the study 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.

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 its facilities. Where an existing facility is operating at less than the LOS C/D threshold, the existing measure of effectiveness should be maintained.
- 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.
- 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 (Assembly Bill 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 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.

Senate Bill 743

Governor Jerry Brown signed California Senate Bill 743 on September 27, 2013, which recommends Vehicle Miles Traveled (VMT) as the sole measure of a project's impact on transportation infrastructure as opposed to the current methods which focus on metrics related to vehicular roadway capacity and LOS.

The shift to VMT will decouple the LOS analysis approach from environmental analysis this has the potential to streamline the CEQA review process in cases where LOS-based traffic impacts could not be mitigated to less than significant levels.

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.

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. 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 two years. If the minimum level-of-service standards are not met, Member Agencies must develop multimodal improvement plans to address the congestion.

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, the most recent plan, was adopted by the VTA Board in October 2014 and builds upon the previous VTP 2035.

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 system improvements. 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 VTA's June 2018 *Santa Clara Countywide Bicycle Plan* identifies planned bicycle network improvements within the study 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 points across physical barriers were identified where there was more than one mile between accessible crossings. This distance was determined to be a deterrent to pedestrian and bicycle activity. Several of these gap locations are within the study area. Potential connections across barriers are recommended to provide access 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 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. As 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 with federal, State, and regional regulations.

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 José, VTA, and Town of Los Gatos. The City of Campbell's General Plan (adopted on November 6, 2001) provides a framework for development within the city. Policies and strategies that are pertinent to the transportation analysis for the proposed project are shown in Table 4.13-1.

In 2016, the City began an effort to update the General Plan called Envision Campbell. The Envision Campbell General Plan Update is currently being developed with an anticipated adoption to occur in 2020/2021.

TABLE 4.13-1 CITY OF CAMPBELL GENERAL PLAN POLICIES AND STRATEGIES PERTAINING TO TRANSPORTATION AND TRAFFIC

Policy/ Strategy Number	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.
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.

TABLE 4.13-1 CITY OF CAMPBELL GENERAL PLAN POLICIES AND STRATEGIES PERTAINING TO TRANSPORTATION AND TRAFFIC

Policy/ Strategy Number	Policy/Strategy Text
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, 2001, City of Campbell General Plan.

4.13.1.2 EVALUATION METHODOLOGIES

Study Area

Study Intersections

A list of study intersections is provided below with the governing agency and inclusion of the location in the Santa Clara County CMP network indicated. Each intersection is further described on the following page. The numbers below are used throughout this chapter and the TIA to identify the intersections:

- #1) San Tomas Expressway/Hamilton Avenue (County, CMP)
- #2) San Tomas Expressway/Campbell Avenue (County, CMP)
- #3) Winchester Boulevard/West Sunnyoaks Avenue (Campbell)
- #4) Dell Avenue/East Sunnyoaks Avenue (Campbell)
- #5) Bascom Avenue/Curtner Avenue (San José, CMP)
- #6) San Tomas Expressway/SR 17 Southbound Ramps (County, CMP)
- #7) Camden Avenue/White Oaks Road-Curtner Avenue (County, CMP)
- #8) Winchester Boulevard/West Hacienda Avenue (Campbell)

- #9) Dell Avenue/Hacienda Avenue (Campbell)
- #10) Bascom Avenue/Camden Avenue (San José, CMP)
- #11) Winchester Boulevard/Knowles Drive (Los Gatos)
- #12) Winchester Boulevard/SR 85 Northbound Ramp (Caltrans)
- #13) Winchester Boulevard/SR 85 Southbound Ramp (Caltrans)
- #14) Winchester Boulevard /Albright Way (Los Gatos)
- #15) Winchester Boulevard /Wimbledon Drive (Los Gatos)
- #16) Bascom Avenue/SR 85 Northbound Ramps (San José, CMP)
- #17) Bascom Avenue/SR 85 Southbound Ramps (San José, CMP)
- #18) Los Gatos Boulevard /Burton Road-Samaritan Drive (San José, CMP)
- #19) Winchester Boulevard/Lark Avenue (Los Gatos)
- #20) SR 17 South Ramp/Lark Avenue (Caltrans)
- #21) SR 17 North Ramp/Lark Avenue (Caltrans)
- #22) Los Gatos Boulevard/Lark Avenue (Los Gatos, CMP)

Study intersections are described below:

- **#1) San Tomas Expressway/Hamilton Avenue** is a signalized intersection with protected left-turn phasing on all four approaches. The right-most northbound through lane is a carpool-only lane during the AM peak hour and the right-most southbound through lane is a carpool only lane during the PM peak hour. Pedestrian refuge islands and crosswalks are provided on all four legs. This intersection is operated by Santa Clara County and is part of the County's CMP network.
- **#2) San Tomas Expressway/Campbell Avenue** is a signalized intersection with protected left-turn phasing on all four approaches. The right-most northbound through lane is a carpool-only lane during the AM peak hour and the right-most southbound through lane is a carpool only lane during the PM peak hour. All four legs have pedestrian refuge islands and crosswalks. This intersection is operated by Santa Clara County and is part of the County's CMP network.
- **#3) Winchester Boulevard/W. Sunnyoaks Avenue** is a signalized intersection with three approach legs with protected left-turn phasing on the northbound Winchester Boulevard approach. Crosswalks are provided on the west and south legs of the intersection. This intersection is operated by the City of Campbell.
- **#4) East Sunnyoaks Avenue/Dell Avenue** is an all-way stop-controlled intersection with three approach legs. The intersection has with pavement markings are present to provide additional separation between right turn and through traffic at the northbound and westbound approaches. The intersection has no crosswalks. This intersection is under the jurisdiction of the City of Campbell.
- **#5) Bascom Avenue/Curtner Avenue** is a signalized intersection with protected left-turn phasing on all approaches. Crosswalks are provided on every leg. This intersection is operated by the City of San José and is part of the County's CMP network.
- **#6) San Tomas Expressway/SR 17 Southbound Ramps** is a signalized intersection with protected left-turn phasing for northbound San Tomas Expressway. Crosswalks are provided on the north and west legs only. This intersection is operated by Santa Clara County and is part of the County's CMP network.

- #7) Camden Avenue/White Oaks Road-Curtner Avenue is a four-legged signalized intersection with protected left-turn phasing on northbound and southbound Camden Avenue approaches and split-phasing on the Curtner Avenue and White Oaks Road approaches. Crosswalks are provided on the south, west and east legs of the intersection with channelized right-turn lanes on the eastbound White Oaks Road and southbound Camden Avenue approaches. Right turns are prohibited on red for the northbound Camden Avenue to Curtner Avenue movement. This intersection is operated by Santa Clara County and is part of the County's CMP network.
- #8) Winchester Boulevard/W. Hacienda Avenue is a four-legged signalized intersection with protected left-turn phasing on Winchester Boulevard and split-phasing on Hacienda Avenue. Crosswalks are provided on all four legs of the intersection. There is a railroad track parallel to Winchester Boulevard just east of the crosswalk over East Hacienda Avenue. This intersection is operated by the City of Campbell.
- #9) Dell Avenue/Hacienda Avenue a three-way stop-controlled intersection. A crosswalk is provided on the south leg of the intersection. This intersection is under the jurisdiction of the City of Campbell.
- #10) Bascom Avenue/Camden Avenue is a signalized intersection with protected left-turn phasing on all approaches. Crosswalks are provided on every leg. This intersection is operated by the City of San José and is part of the County's CMP network.
- #11) Winchester Boulevard/Knowles Drive is a signalized intersection with protected left-turn phasing along Winchester Boulevard and split-phasing on Knowles Drive. There is a railroad track parallel to Winchester Boulevard just east of the intersection. Crosswalks are provided on the south and west legs only. This intersection is operated by the City of Los Gatos.
- #12) Winchester Boulevard/Winchester Circle-SR 85 North Ramp is a signalized intersection with protected left-turn phasing on Winchester Boulevard and Winchester Circle. There is a railroad track parallel to Winchester Boulevard between Winchester Boulevard and the crosswalk. Crosswalks are provided on the north and east legs only. This intersection is operated by Caltrans.
- #13) Winchester Boulevard/SR 85 Southbound Ramp is a three-legged signalized intersection with left-turn movements prohibited along Winchester Boulevard. There is a railroad track parallel to Winchester Boulevard just east of the intersection that also curves and crosses Winchester Boulevard with an at-grade crossing just south of this intersection. Only the west leg has a crosswalk. This intersection is operated by Caltrans.
- #14) Winchester Boulevard/Albright Way is a signalized intersection with protected left-turn phasing on Winchester Boulevard and split-phasing on Albright Way. Crosswalks are provided on the east, west and north legs only. This intersection is operated by the City of Los Gatos.
- #15) Winchester Boulevard/Wimbledon Drive is a three-legged signalized intersection with protected left-turn phasing on the northbound and eastbound approaches. Crosswalks are provided on the west and north legs only. This intersection is operated by the City of Los Gatos.
- #16) Bascom Avenue/SR 85 Northbound Ramps is a signalized intersection with protected left turns from northbound Bascom Avenue. Crosswalks are provided on the north and south legs only. This intersection is operated by the City of San José and is part of the County's CMP network.

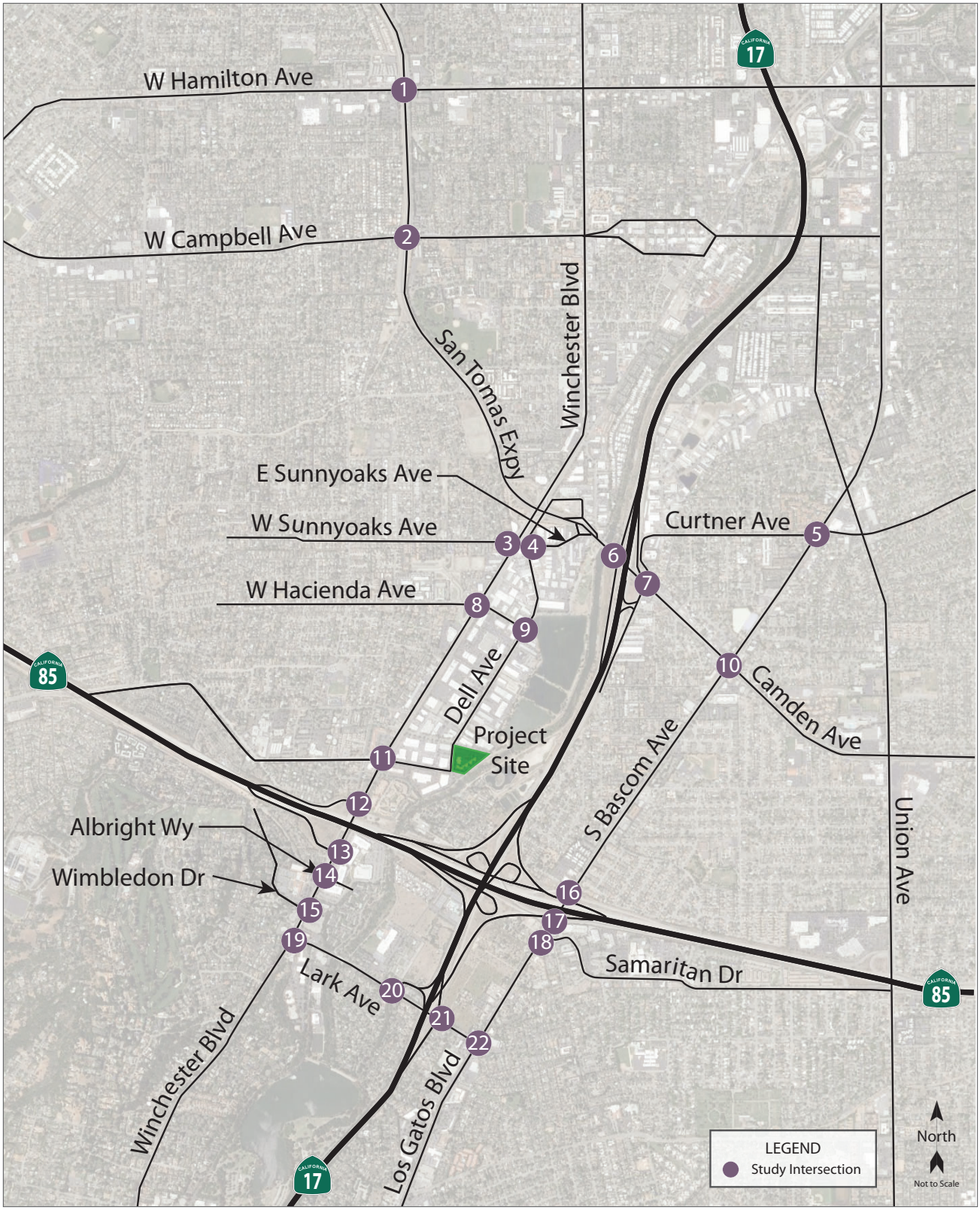
- #17) Bascom Avenue/SR 85 Southbound Ramps is a signalized intersection with protected left-turns at southbound Bascom Avenue. Crosswalks are provided at the north and south legs only. This intersection is operated by the City of San José and is part of the County's CMP network.
- #18) Los Gatos Boulevard/Burton Road-Samaritan Drive is a signalized intersection with protected left-turn phasing along Los Gatos Boulevard and split-phasing along Samaritan Drive. Crosswalks are provided at the south and east legs only. This intersection is operated by the City of San José and is part of Santa Clara County's CMP network.
- #19) Winchester Boulevard/Lark Avenue is a three-legged signalized intersection with protected left-turn phasing on the southbound and westbound approaches. Crosswalks are provided on the north and east legs only. This intersection is operated by the City of Los Gatos.
- #20) SR 17 South Ramp-Garden Hill Drive/Lark Avenue is a signalized intersection with protected left-turn phasing along Lark Avenue and split-phasing on the SR 17-Garden Hill Drive approaches. Crosswalks are provided on the north and south legs only. This intersection is operated by Caltrans.
- #21) SR 17 North Ramp/Lark Avenue is a signalized intersection with protected left-turn phasing on the eastbound Lark Avenue approach only. Crosswalks are provided at the north and south legs only. This intersection is operated by Caltrans.
- #22) Los Gatos Boulevard/Lark Avenue is a signalized intersection with protected left-turn phasing along Los Gatos Boulevard and split-phasing along Lark Avenue. Channelized right turns are provided at the southbound and eastbound approaches. Crosswalks are provided at the south and west legs only. This intersection operated by the City of Los Gatos and is part of Santa Clara County's CMP network.

The intersections included in the study are shown in Figure 4.13-1. Existing lane configurations and controls are shown in Figure 4.13-2.

Study Local Roadways

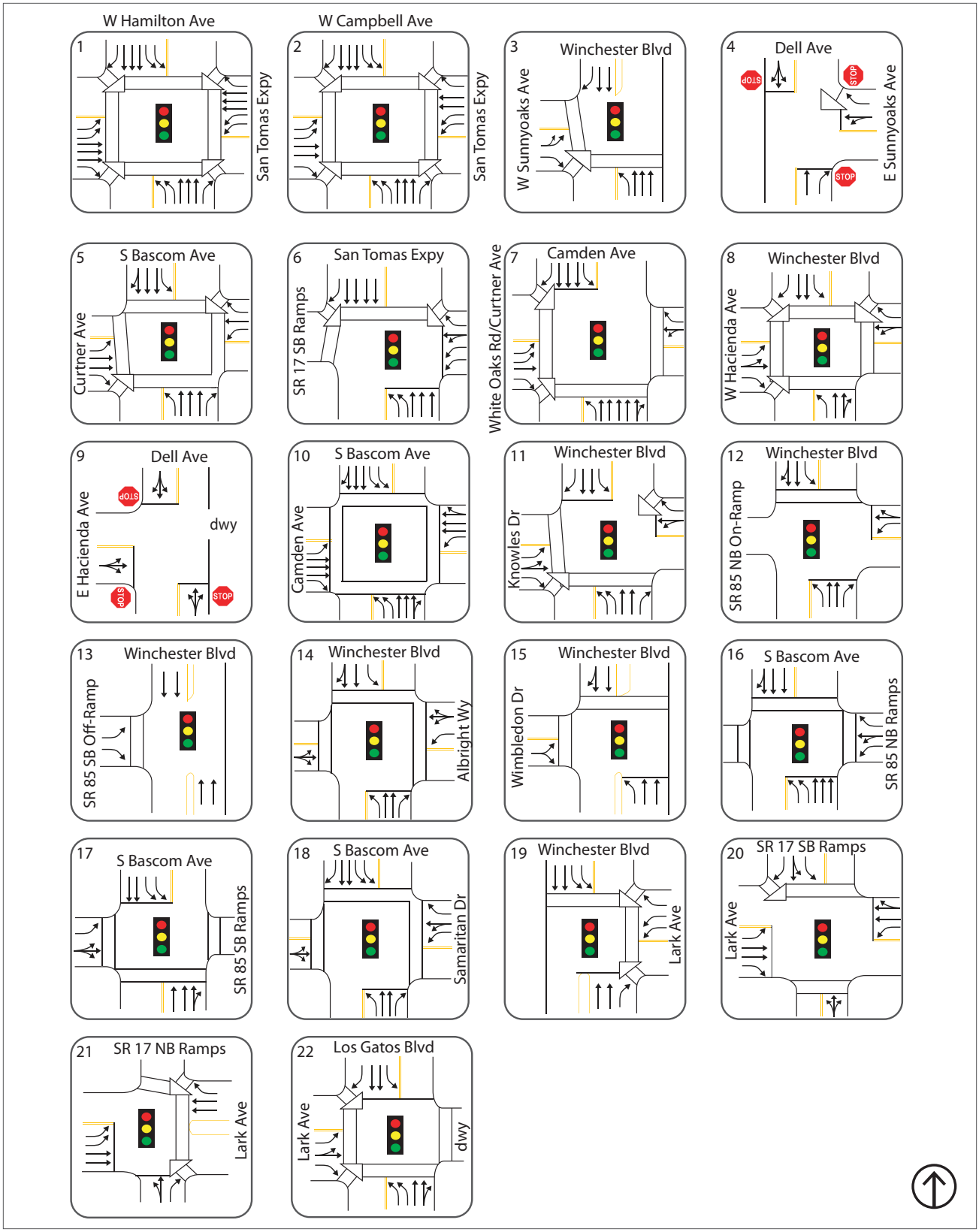
The following nearby residential streets were evaluated for potential impacts:

1. Hacienda Avenue from Winchester Boulevard to Capri Drive
2. Hacienda Avenue from Capri Drive to Virginia Avenue



Source: W-Trans, 2018.

Figure 4.13-1
Study Intersections



Source: W-Trans, 2019.

Figure 4.13-2
Existing Lane Configurations

Study Freeway Segments

Operation of the following freeway segments designated as CMP facilities was also evaluated.

- #1) Northbound SR 17 between Saratoga Avenue and Lark Avenue
- #2) Northbound SR 17 between Lark Avenue and SR 85
- #3) Northbound SR 17 between SR 85 and San Tomas Expressway/Camden Avenue
- #4) Northbound SR 17 between San Tomas Expressway/Camden Avenue and Hamilton Avenue
- #5) Southbound SR 17 between Hamilton Avenue and San Tomas Expressway/Camden Avenue
- #6) Southbound SR 17 between San Tomas Expressway/Camden Avenue to SR 85
- #7) Southbound SR 17 between SR 85 and Lark Avenue
- #8) Southbound SR 17 between Lark Avenue and Saratoga Avenue
- #9) Northbound SR 85 between Union Avenue and Bascom Avenue
- #10) Northbound SR 85 between Bascom Avenue and SR 17
- #11) Northbound SR 85 between SR 17 and Winchester Boulevard
- #12) Northbound SR 85 between Winchester Boulevard and Saratoga Avenue
- #13) Southbound SR 85 between Saratoga Avenue and Winchester Boulevard
- #14) Southbound SR 85 between Winchester Boulevard and SR 17
- #15) Southbound SR 85 between SR 17 and Bascom Avenue
- #16) Southbound SR 85 between Bascom Avenue and Union Avenue

Trip Generation, Distribution, and Assignment

The amount of traffic associated with a project is estimated using a three-step process: 1) trip generation; 2) trip distribution; and 3) trip assignment.

Trip generation is the process of predicting the number of peak-hour trips a proposed development would contribute to the roadways, and whether these trips would be entering or exiting the site. After the number of trips is determined, the distribution process predicts the direction these trips use to approach and depart the site, from a regional perspective. Trip assignment involves determining which specific roadways a vehicle would use to travel between its origin and destination. These procedures are described further below.

Trip Generation

The anticipated trip generation for the proposed project was estimated using fitted curve equations published by the Institute of Transportation Engineers (ITE) in *Trip Generation Manual*, 10th Edition, 2017 for “General Office Building” (ITE LU #710). Because the site is currently occupied by an office building, the trip generation for “General Office Building” was also used to estimate the existing trips at the site. These trips were reduced by 68 percent which is the current proportion of the building that is not occupied (according to information provided by the project sponsor, the current building occupancy was 32 percent in May 2018 when the traffic counts were conducted). Internal capture trips are a portion of the total trips generated by a development project that both begin and end within the development. Internal capture trips are commonly applied in development projects with multiple land uses (such as various combinations of office, retail, and residential). Vehicle trips which 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 trips." These trips are typically associated with retail and commercial land uses such as gas stations and fast-food restaurants. Since the proposed project is not proposing a mixed-use development with retail and commercial components, it is not anticipated to generate any internal capture trips or have pass-by trip credits or trip reductions resulting from nearby transit options. The trips associated with the open public space area are assumed to be zero as all the expected users would be employees of the development and would already be on-site or people who are passing by on the Los Gatos Creek Trail.

The expected trip generation potential for the proposed project as indicated in Table 4.13-2 includes a net average of 1,447 additional trips per day, including 149 trips during the AM peak hour and 153 trips during the PM peak hour.

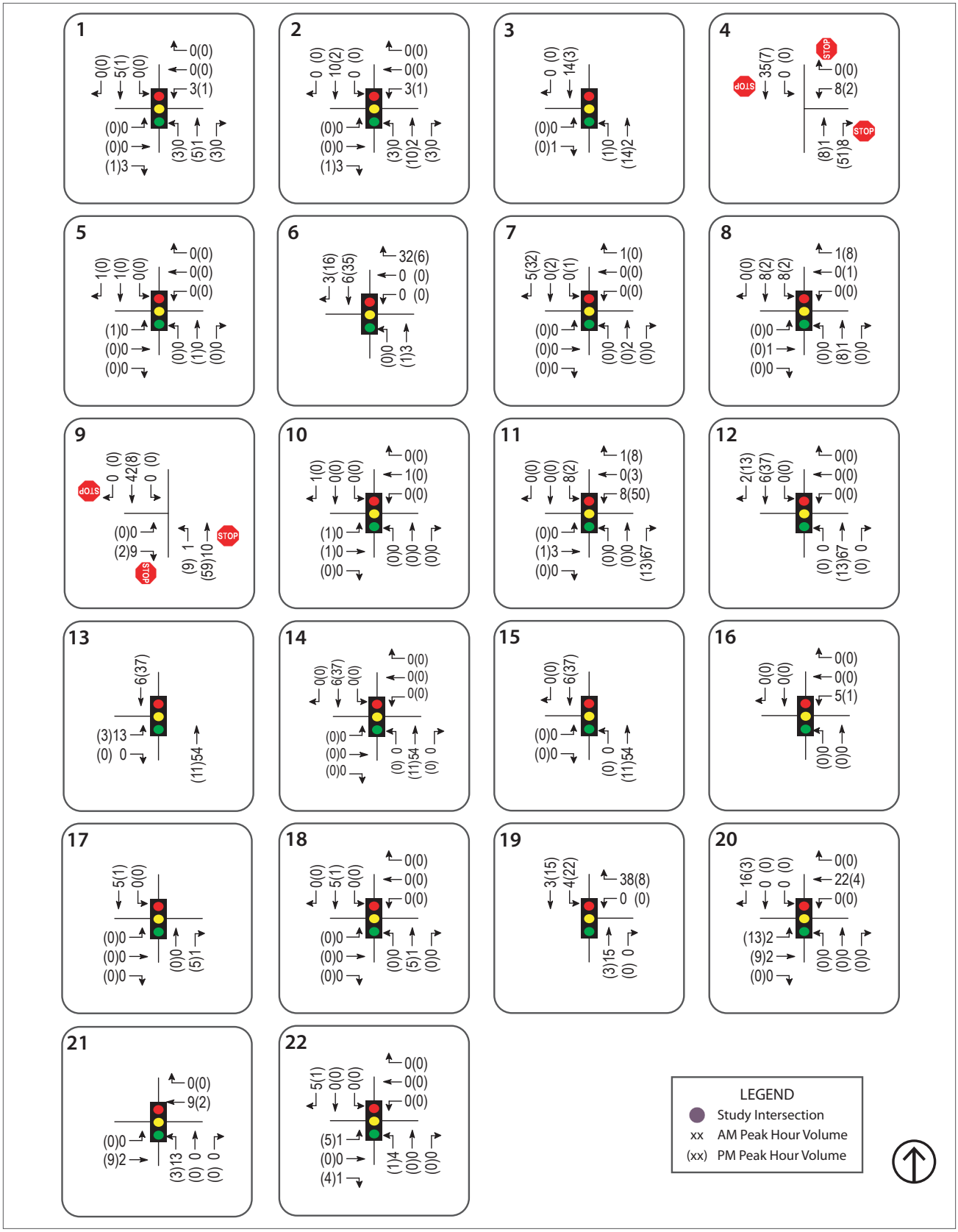
TABLE 4.13-2 TRIP GENERATION SUMMARY

Land Use	Size (ksf)	Daily		AM Peak Hour				PM Peak Hour			
		Rate	Trips	Rate	Trips	In	Out	Rate	Trips	In	Out
Existing											
General Office Building	71.62	10.72	-768	1.31	-94	-81	-13	1.16	-83	-13	-70
Occupancy Adjustment		68%	522	68%	64	55	9	68%	56	9	47
Subtotal (Occupied)			*-246*		*-30*	*-26*	*-4*		*-27*	*-4*	*-23*
Proposed											
General Office Building	161.87	10.46	1,693	1.10	179	154	25	1.11	180	29	151
Total			**1,447**		**149**	**128**	**21**		**153**	**25**	**128**

Note: ksf = 1,000 square feet
Source: W-Trans, 2018.

Trip Distribution and Assignment

Trip distribution reflects the origin and destination of trips, such as north to Alameda County or south to Santa Cruz. Trip assignment is the routing of vehicle trips on local and regional roadways from one place to another. The trip distribution pattern used to assign new project trips to the street network was determined by field observations, land uses in the area, traffic count data, as well as consistency with assumptions applied in previous traffic impact analyses in the area. Since major modifications to the roadway network in Campbell are not anticipated, the same trip distribution was used for all study periods and conditions. Project trip turning movement volumes for study intersections are shown in Figure 4.13-3 and the applied distribution assumptions and resulting trips are shown in Table 4.13-3.



Source: W-Trans, 2019.

Figure 4.13-3
Project Trip Turning Movement Volumes

TABLE 4.13-3 TRIP DISTRIBUTION AND ASSIGNMENT ASSUMPTIONS

Route	Percent	Daily Trips	AM Trips	PM Trips
to/from north via SR 17	25%	174	19	18
to/from north via Winchester Boulevard	5%	14	1	2
to/from north via Bascom Avenue	1%	362	37	38
to/from south via SR 17	10%	145	15	15
to/from south via Los Gatos Boulevard	3%	145	15	15
to/from south via Winchester Boulevard	12%	247	26	26
to/from east via SR 85	17%	14	1	2
to/from east via Camden Avenue	1%	14	1	2
to/from west via San Tomas Expressway	12%	29	3	3
to/from west via SR 85	10%	72	7	7
to/from west via Knowles Drive	2%	174	19	18
to/from west via West Sunnyoaks Avenue	1%	14	1	2
to/from west via Hacienda Avenue	1%	43	4	5
Total	**100%**	**1,447**	**149**	**153**

Source: W-Trans, 2018.

Study Periods

Operating conditions during the a.m. and p.m. peak periods were evaluated to capture the highest potential impacts for the proposed project as well as the highest volumes on the local transportation network. The morning peak hour occurs between 7:00 and 9:00 a.m. and reflects conditions during the home to work or school commute, while the PM peak hour occurs between 4:00 and 6:00 p.m. and typically reflects the highest level of congestion during the homeward bound commute. Where available, traffic counts from the Santa Clara County Congestion Management Program (sources from various dates in October through December 2016) were used for the PM peak hour analysis. Intersection counts are included in the technical appendix to this Draft EIR (Appendix I). The AM and PM peak hours for the following scenarios were evaluated:

1. Existing Conditions. Existing peak hour volume, lane geometry, and traffic control (e.g., signal timing, signal phasing, etc.)
2. Existing plus Project Conditions. Existing peak hour volumes plus net-new Project-generated trips estimated for the proposed office building with multilevel parking structure.
3. Background Conditions. (Existing plus Approved but Not Yet Built Projects). Existing peak hour volumes plus trips from approved but not yet constructed developments in the study area vicinity.

4. Background plus Project Conditions. (Existing Plus Approved Plus Project). Background condition volumes plus net-new Project-generated trips estimated for the proposed office building with multilevel parking structure.
5. Cumulative Conditions. Existing peak hour volumes plus anticipated forecasted growth for the year 2040 derived from the Santa Clara County Travel Demand Model.
6. Cumulative plus Project Conditions. Cumulative year condition volumes plus net-new Project-generated trips estimated for the proposed office building with multilevel parking structure.

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, Level of Service A represents free flow conditions and Level of Service F represents forced flow or breakdown conditions. A unit of measure that indicates a level of delay generally accompanies the LOS designation.

Study intersections were evaluated using the signalized intersection methodology published in the *Traffic Level of Service Analysis Guidelines*, Santa Clara County Transportation Authority, Congestion Management Program (CMP), 2003. This methodology is based on the signalized methodology published in the *Highway Capacity Manual* (HCM), Transportation Research Board, 2000, which has been modified for use in Santa Clara County. This methodology is based on factors including traffic volumes, green time for each movement, phasing, whether the signals are coordinated or not, truck traffic, and pedestrian activity. Average stopped delay per vehicle in seconds is used as the basis for evaluation in this LOS methodology. VTA has adopted modified default values for HCM analysis as well as modified LOS thresholds. These modified default values were applied to all study intersections. The City of Campbell employs the CMP default values used by the VTA for the analysis parameters and shown in Table 4.13-4.

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 overall intersection, which is then related to an LOS. The ranges of delay associated with the various levels of service are indicated in Table 4.13-5.

TABLE 4.13-4 SANTA CLARA VTA LEVEL OF SERVICE CRITERIA

LOS	Control Delay (sec per veh)	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: Santa Clara Valley Transportation Authority, 2003, Traffic Level of Service Analysis Guidelines.

TABLE 4.13-5 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: Transportation Research Board, 2000, Highway Capacity Manual.

Freeway Levels of Service

Freeways in the study area identified as being in the CMP in Santa Clara County were analyzed using the data published in VTA's 2016 Annual Monitoring and Conformance Report, which is based on the density of traffic flow using methods described in the 2000 HCM and on VTA's *Traffic Level of Service Analysis Guidelines* (June 2003). Density is expressed in passenger's cars per mile per lane. Vehicle density is calculated using the following formula:

$$D = \frac{V}{N \times S}$$, 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 with three lanes or more in one direction, a capacity of 2,200 vphpl be used for segments two lanes in one direction and a capacity of 1,650 vphpl be used on HOV lanes. VTA CMP definitions for freeway segment levels of service are summarized in Table 4.13-6.

TABLE 4.13-6 FREEWAY SEGMENT LEVEL OF SERVICE DEFINITIONS (SANTA CLARA COUNTY)

LOS	Density (Passenger Cars/ Mile/Lane)	Travel Speed (mph)	Description
A	Density < 11.0	60-65	Free flow operations.
B	11.0 < density < 18.0	57-60	Reasonably free flow, and free flow speeds are maintained.
C	18.0 < density < 26.0	54-57	Flow with speeds and or near the free-flow speed.
D	26.0 < density < 46.0	46-54	Level at which speed begins to decline with increasing flow.
E	46.0 < density < 58.0	35-46	Operation at capacity.
F	58.0 < density	< 35	Breakdown in vehicular flow.

Source: Santa Clara Valley Transportation Authority, 2016, 2016 CMP Monitoring and Conformance Report.

Traffic Signal Warrant Analysis

A traffic signal warrant analysis was performed to determine the potential need for a traffic signal at each unsignalized study intersection that is projected to operate below the LOS standards. A warrant is a set of criteria used to define the relative need for, and appropriateness of a particular traffic control device (e.g., stop sign, signal, etc.) Chapter 4C of the *California Manual on Uniform Traffic Control Devices* (CA-MUTCD) provides guidance on when a traffic signal should be considered. There are nine warrants in all. Many are not applicable to every situation. Warrant 3 is the most commonly used and is most appropriate for the purposes of this study. Warrant 3 is satisfied when an engineering study finds that the criteria in either of the following two categories are met:

A. If all three of the following conditions exist for the same one hour (any four consecutive 15-minute periods) of an average day:

    1. The total stopped time delay experienced by the traffic on one minor-street approach (one direction only) controlled by a STOP sign equals or exceeds: four vehicle-hours for a one-lane approach; or five vehicle-hours for a two-lane approach, and

2. The volume on the same minor-street approach (one direction only) equals or exceeds 100 vehicles per hour for one moving lane of traffic or 150 vehicles per hour for two moving lanes, and
3. The total entering volume serviced during the hour equals or exceeds 650 vehicles per hour for intersections with three approaches or 800 vehicles per hour for intersections with four or more approaches.

B. The plotted point representing the vehicles per hour on the major street (total of both approaches) and the corresponding vehicles per hour on the higher-volume minor-street approach (one direction only) for one hour (any four consecutive 15-minute periods) of an average day falls above the applicable curve for the existing combination of approach lanes.

Traffic Infusion on Residential Environment (TIRE) Index

The potential effect of adding project-related traffic on residential streets near the project site 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 depending on daily traffic volume. An index of 0.0 represents the least infusion of traffic and 5.0 the greatest, and, thereby the poorest residential environment. A TIRE index of 3.0 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. According to this methodology, an impact occurs on the residential street when the difference in index between no project and project conditions is 0.10 or more. An abbreviated list of the TIRE indices is presented in Table 4.13-7, while the entire TIRE index table is provided in the technical appendix to this Draft EIR (Appendix I).

TABLE 4.13-7 TIRE INDEX TABLE

Existing Volume Range (Daily Volume)	TIRE Index	Minimum Daily Volume Increase to Produce +0.1 Change in the TIRE Index
561-710	2.8	140
711-890	2.9	170
891-1,100	3.0	220
1,101-1,400	3.1	290
1,401-1800	3.2	380
1,801-2,200	3.3	500
2,201-2800	3.4	650

Source: Goodrich Traffic Group, 2018.

Queuing at Freeway Ramps

The following select freeway on- and off-ramps were evaluated to determine whether there is adequate storage for the anticipated queues for conditions under the Existing and Existing plus Project, Background and Background plus Project, and Cumulative and Cumulative plus Project volumes:

- Northbound SR 85 Winchester Boulevard Diagonal On-Ramp
- Southbound SR 85 Winchester Boulevard Diagonal Off-Ramp
- Northbound SR 17 On- and Off-Ramp to/From White Oaks Road
- Southbound SR 17 On- and Off-Ramp to/From San Tomas Expressway

At the SR 85 Northbound On-Ramp from Winchester Boulevard and the SR 17 Southbound On-Ramp from San Tomas Expressway standard queue approximating formulas were used to estimate the 95th percentile[1] queue lengths at the ramp metering lights on each on-ramp. Metering rates used for the analysis were provided by Caltrans.

At the Winchester Boulevard/SR 85 Off-Ramp and San Tomas Expressway/SR 17 South Ramps intersections the 95th percentile queue length of the off-ramp was estimated using a Poisson Probability Distribution to determine if the anticipated queue length would be expected to exceed the storage length of the off-ramp.

At the White Oaks Road/SR 17 Northbound Ramps intersection, SimTraffic was used to evaluate the 95th percentile queue length on the off-ramp from SR 17 North. SimTraffic is a stochastic microsimulation tool that is capable of tracking vehicles across multiple intersections such as is the case with the operation of the closely spaced intersections of White Oaks Road/SR 17 North Ramps and Camden Avenue/White Oaks Road. SimTraffic is a useful tool when analyzing congested traffic conditions that span multiple roadway segments or intersections where queued sections are likely to impact the performance of other segments upstream of the traffic flow. SimTraffic estimates of the 95th percentile queue lengths are based off the measured average queue length plus 1.65 standard deviations.

SimTraffic can vary the arrival of vehicles to replicate probable real-world conditions. Since these occur randomly in the model, each run of the model produces a slightly different outcome. For this reason, the SimTraffic model was run ten times and results shown here represent the average.

[1] The 95th-percentile queue is defined to be the queue length (in number of vehicles) that has only a 5-percent probability of being exceeded during the analysis time period. It is a useful parameter for determining the appropriate length of turn pockets, but it is not typical of what an average driver would experience.

4.13.1.3 EXISTING CONDITIONS

Vehicular Circulation

Roadway Network

Regional Roadway Network

Within the study area, regional access is provided primarily 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 respectively, San Tomas Expressway transitions to Camden Avenue and Montague Expressway. Within the study 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 José. North of I-280, SR 17 transitions into I-880 to Oakland. Access to the study 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 José, where it once again joins with US 101. Within the study area, SR 85 runs generally in the east-west direction and consists of two mixed-flow lanes plus an HOV lane in each direction. Interchanges with Winchester Boulevard and Los Gatos Boulevard provide access to the study area from SR 85.

Local Roadway Network

The study 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:

- Albright Way is a two-lane local roadway, located in Los Gatos, that provides direct access between the Bay Club Courtside Tennis Club, The Netflix Campus and Winchester Boulevard.
- Campbell Avenue is a two-to four-lane east-west minor arterial roadway that provides access between Downtown Campbell, Bascom Avenue and Saratoga Avenue in San José.
- Curtner Avenue is a two- to four-lane east-west minor arterial roadway providing access between Camden Avenue and the Willow Glen area of San José.
- Camden Avenue is a four-lane north-south principal arterial roadway that extends from Campbell to Los Gatos where it terminates at Blossom Hill Road.
- 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 study area.
- 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.

- Hacienda Avenue is an east-west residential collector with one lane in each direction of travel. It extends between Del Loma Drive in San Jose, just north of SR 85, eastward past Winchester Boulevard to Dell Avenue in Campbell, where it terminates. Hacienda Avenue provides access to the study area.
- Hamilton Avenue is a six-to eight-lane east-west principal arterial roadway that provides access between Saratoga Avenue and San José where it becomes Pine Avenue east of Hicks Avenue.
- Knowles Drive is an east-west local street that connects Pollard Road and Dell Avenue. Within the study area, Knowles Drive has one to two lanes in each direction. It provides access to the study area.
- Lark Avenue is a four-lane east-west arterial that runs between Winchester Boulevard and Los Gatos Boulevard in Los Gatos.
- Los Gatos Boulevard-Bascom Avenue is a four- to six-lane north-south arterial that extends from East Main Street in Los Gatos, south of Saratoga Los Gatos Road, to I-880 in San José. North of Samaritan Drive it is known as Bascom Avenue; south of Samaritan Drive it is called 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 two-way left-turn lane.
- Samaritan Drive is a two- to four-lane east-west major collector road that extends from Bascom Avenue/Los Gatos Boulevard (Campbell/Los Gatos border) eastward to Union Avenue in San José.
- West Sunnyoaks Avenue is an east-west residential collector with one lane in each direction, connecting Virginia Avenue and Winchester Boulevard.
- White Oaks Road is a two-lane north-south local roadway connecting Bascom Avenue in San José with Camden Avenue.
- Wimbledon Drive is a two-lane east-west local roadway connecting Winchester Boulevard with Wedgewood Avenue in Los Gatos.
- Winchester Boulevard is a four-lane north-south arterial roadway extending from Santa Clara southward to Los Gatos. North of Division Street, Winchester Boulevard consists of four-lanes (two lanes in each direction) plus a two-way left-turn lane (TWLTL). Between Lark Avenue and Division Street, the northbound and southbound directions on Winchester Boulevard are separated by a raised median with openings at each intersection for cross-street access. Winchester Boulevard changes to Santa Cruz Avenue south of Blossom Hill Road, in Los Gatos, and to Lincoln Street north of Market Street, in Santa Clara. Access between Winchester Boulevard and the areas to the north is provided via the partial interchange with SR 85.

Bicycle Facilities

The *Highway Design Manual*, California Department of Transportation (Caltrans), 2012, classifies bikeways into three categories that are used by the City of Campbell:

- 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 study 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 José. The trail lies between the Los Gatos Creek and the project site. The project site is adjacent to the trail. A Class II bike lane exists on Winchester Boulevard south of Albright Way. Knowles Drive is classified as a Class III Bike Route from Dell Avenue to Parr Avenue. Bicyclists ride in the roadway and/or on sidewalks along all other streets within the project study area. Table 4.13-8 summarizes the existing and planned bicycle facilities in the project vicinity.

TABLE 4.13-8 BICYCLE FACILITY SUMMARY

Status/Facility	Class	Length (Miles)	Begin Point	End Point
Existing				
Los Gatos Creek Trail	I	9.7	Lexington Reservoir (Los Gatos)	Meridian Ave (San José)
Winchester Blvd	II	1.6	Albright Way	Blossom Hill Rd
Winchester Blvd	III	1.8	Hamilton Ave	Hacienda Ave
Knowles Dr	III	0.8	Dell Ave	Parr Ave
Planned				
Dell Ave	II	0.7	E. Sunnyoaks Ave	Division St
Dell Ave	III	0.1	Division St	Knowles Dr

Source: Santa Clara Valley Bikeways Map, 2016, Santa Clara Valley Transportation Authority.

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 study area; however, sidewalk gaps, obstacles, and barriers can be found along some or all of the roadways. 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. This includes the area of Dell Avenue along the project frontage, which currently has no sidewalks.
- Winchester Boulevard. Within the study 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, intermittent sidewalks are provided on both sides of Winchester Boulevard.

- Hacienda Avenue. Intermittent sidewalks exist on both sides of the roadway east of Winchester Boulevard.
- Knowles Drive. A continuous sidewalk exists on the south side of Knowles Drive, east of Winchester Boulevard; however, no sidewalk is provided on the north side of the roadway. West of Winchester Boulevard, 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 sides of Hacienda Avenue just east of Winchester Boulevard, pedestrian connectivity to the study 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 side of Dell Avenue at Hacienda Avenue. A sidewalk exists only at the southwest corner of this intersection.
- Dell Avenue/Division Street. The addition of painted crosswalks is planned at the south and west legs.

Transit Services

The VTA provides fixed route bus service and light rail train service in Santa Clara County. Two bicycles can be carried on VTA light rail trains and most VTA buses. Bike rack space is on a first come, first served basis. Additional bicycles are allowed on VTA buses at the discretion of the driver. VTA provides bus service to the immediate study area via two local routes that are described below. Specific routes and schedules are subject to change in the future at the choice of the operating agency.

- Bus Route 37 provides weekday service between the Capitol LRT station and West Valley College, connecting Camden Avenue, Winchester LRT Station, Winchester Boulevard, and Hacienda Avenue. Service is provided between 6:00 a.m. and 10:00 p.m. with an approximately 30-minute headway during the AM and PM peak hours. The nearest bus stop to the project site is located approximately one-half-mile away near the intersection of Winchester Boulevard/Hacienda Avenue.
- Bus Route 48 provides both weekday and weekend service between Los Gatos Civic Center and the Winchester Transit Center in Campbell via Winchester Boulevard, Hacienda Avenue, and Knowles Drive. During weekdays, service is provided 6:00 a.m. to 7:30 p.m. with approximately 30- to 60-minute headways. On weekends, service is provided between 7:30 a.m. and 7:30 p.m. with an approximately 60-minute headway. The nearest bus stop to the project site is located approximately 2,000 feet away near the intersection of Capri Drive/Knowles Drive.

Additionally, the Winchester Transit Center is located approximately 1.5 miles north of the study area at 2400 Winchester Boulevard. 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 Station Area. Line 902 operates on weekdays between 5:00 a.m. and 12:00 a.m. with 10- to 20-minute headways and from 6:00 a.m. to 12:00 a.m. with 30-minute headways. The Winchester Transit Center is also served by VTA Bus Routes 37, 48, 49, 60, and 101.

Dial-a-ride, also known as paratransit, or door-to-door service, is available for those who are unable to independently use the transit system due to a physical or mental disability. VTA Paratransit is designed to serve the needs of individuals with disabilities within the City of Campbell and greater Santa Clara County.

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 (LRT) Extension. The proposed Vasona LRT Extension includes 1.6 miles of new double light rail tracks running in the existing railroad right-of-way parallel to 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 off-peak periods and on 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, approximately one-half-mile from the project site (see Figure 4.13-4). Construction of this station would require acquisition of additional right-of-way to the east of the railroad right-of-way and removal of 80 parking spaces at the Vasona Technology Park. The station would also require partial removal of the center turn lane on Winchester Boulevard to accommodate the expanded rail 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 and 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 northbound on-ramp. The Vasona Junction Station is planned to include a park-and-ride lot as well as two bus stops in a currently vacant parcel to the south of the Netflix development. 135 parking spaces are also currently planned. 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.

Source: Google Earth Professional, 2018. PlaceWorks, 2019.

Project Site Boundary

Proposed VTA Light Rail Extension

0 700
Scale (Feet)

Figure 4.13-4
Proposed VTA Light Rail Station Locations

Existing Condition Traffic Operations

Existing Intersection Levels of Service

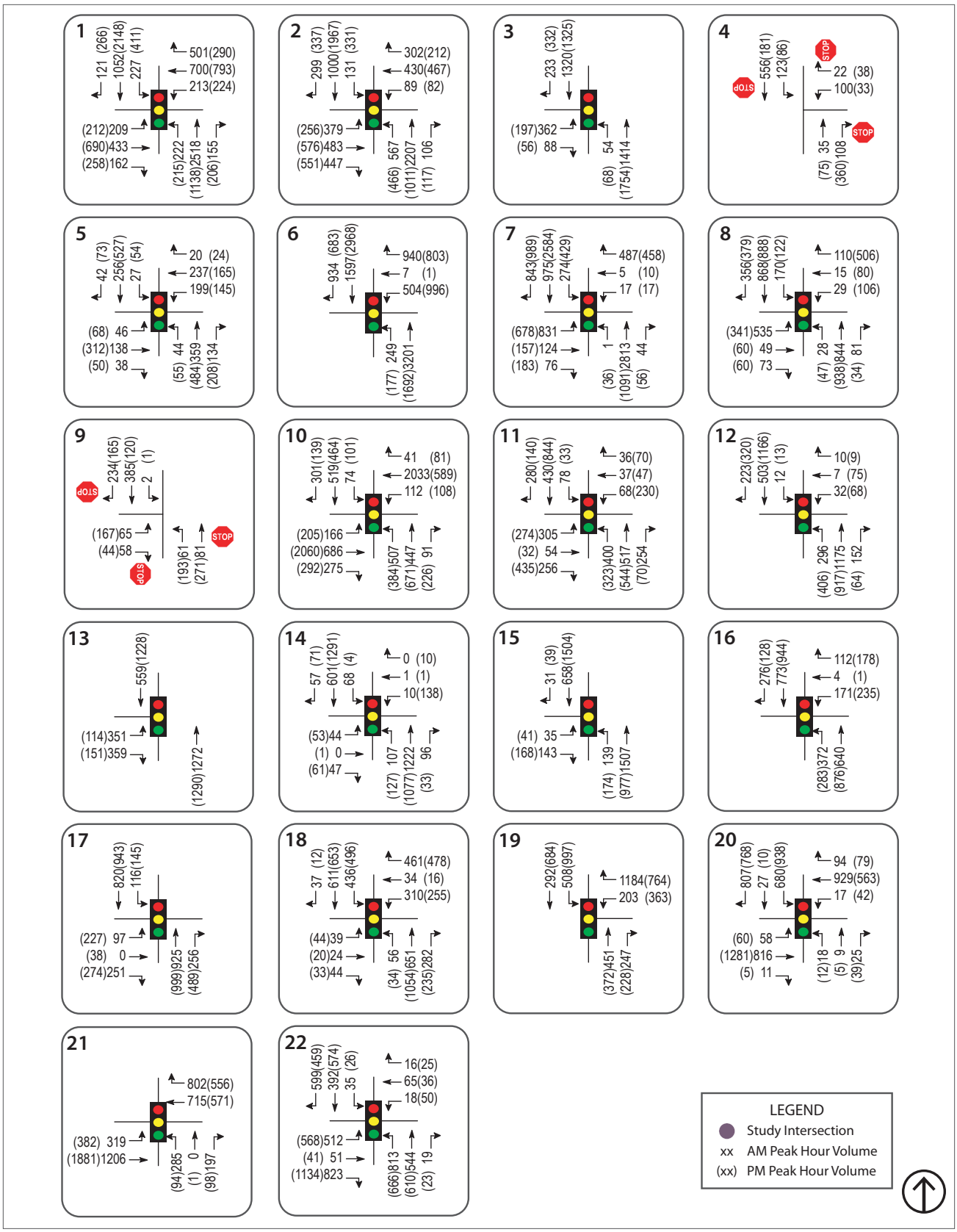
The Existing Conditions scenario provides an evaluation of current operation based on existing traffic volumes during the AM and PM peak periods. This condition does not include project-generated traffic volumes.

Where available, traffic counts conducted during the Fall or Winter of 2016 from the Santa Clara County CMP were used for the PM peak hour analysis. At all remaining locations, traffic data was collected either in May 2018 or September 2018 while local schools were in session.

Under existing conditions, all study intersections are operating at acceptable Levels of Service during the AM and PM peak hours except for the following intersections and periods:

- #2) San Tomas Expressway/Campbell Avenue during the PM peak hour (LOS F);
- #6) San Tomas Expressway/SR 17 South Ramps during the AM peak hour (LOS F); and
- #7) Camden Avenue/White Oaks Road-Curtner Avenue during the AM peak hour (LOS F)

Existing intersection traffic volumes are shown in Figure 4.13-5, a summary of existing intersection Levels of Service is contained in Table 4.13-9, and copies of the Level of Service calculations are provided in the technical appendix to this Draft EIR (Appendix I).



Source: W-Trans, 2019.

Figure 4.13-5
Existing Conditions Traffic Volumes

TABLE 4.13-9 EXISTING PEAK HOUR INTERSECTION LEVELS OF SERVICE

		AM Peak		PM Peak	
	Study Intersection	Avg Delay	LOS	Avg Delay	LOS
#1)	San Tomas Exp/Hamilton Ave (CMP)	59.9	E+	59.8	E+
#2)	San Tomas Exp/Campbell Ave (CMP)	66.1	E	**87.9**	**F**
#3)	Winchester Blvd/W. Sunnyoaks Ave	20.0	C+	12.4	B
#4)	Dell Ave/E. Sunnyoaks Ave	48.3	E	11.0	B
#5)	Bascom Ave/Curtner Ave (CMP)	32.9	C-	38.4	D+
#6)	San Tomas Exp/SR 17 SB Ramps (CMP)	**90.4**	**F**	68.3	E
#7)	Camden Ave/White Oaks Rd-Curtner Ave (CMP)	**90.8**	**F**	49.1	D
#8)	Winchester Blvd/W. Hacienda Ave	28.8	C	40.3	D
#9)	Dell Ave/Hacienda Ave	17.9	C	32.9	D
#10)	Bascom Ave/Camden Ave (CMP)	56.4	E+	49.0	D
#11)	Winchester Blvd/Knowles Dr	30.8	C	39.2	D
#12)	Winchester Blvd/SR 85 NB Ramp	12.2	B	25.0	C
#13)	Winchester Blvd/SR 85 SB Ramp	15.8	B	6.8	A
#14)	Winchester Blvd/Albright Wy	9.3	A	11.7	B+
#15)	Winchester Blvd/Wimbledon Dr	11.8	B+	13.7	B
#16)	Bascom Ave/SR 85 NB Ramps (CMP)	20.7	C+	21.4	C+
#17)	Bascom Ave/SR 85 SB Ramps (CMP)	21.2	C+	24.8	C
#18)	Los Gatos Blvd/Burton Rd-Samaritan Dr (CMP)	32.1	C-	32.2	C-
#19)	Winchester Blvd/Lark Ave	28.6	C	15.1	B
#20)	SR 17 SB Ramp/Lark Ave	30.5	C	36.0	D+
#21)	SR 17 NB Ramp/Lark Ave	20.9	C+	12.9	B
#22)	Los Gatos Blvd/Lark Ave (CMP)	50.0	D	37.1	D+

Notes: **BOLD** = unacceptable LOS; delay is measured in average seconds per vehicle; LOS = Level of Service; SB = southbound
Source: W-Trans, 2018.

Existing Freeway Levels of Service

A summary of freeway segments and existing levels of service for both SR 17 and SR 85 are provided in Table 4.13-10 and Table 4.13-11. Potential changes from the Existing to the Existing plus Project level of service of freeway segments near the project site were analyzed. According to *Transportation Impact Analysis Guidelines,* VTA, 2014, a freeway segment shall be included in the analysis if it meets any one of the following conditions:

- The proposed project is expected to add traffic equal to or greater than one-percent of the freeway segment's capacity.
- The proposed project is adjacent to one of the freeway segment's access or egress points.
- Based on engineering judgment, Lead Agency staff determines that the freeway segment should be included in the analysis.

The proposed project would not add more than one percent to any freeway segment, and is not located adjacent to a freeway access or egress point. Therefore, a freeway segment analysis is not required per the VTA traffic impact analysis guidelines. However, a brief analysis was conducted to document existing freeway conditions and potential changes to levels of service attributable to the project.

As reported in the most recent Congestion Management Program Monitoring Study (2016), mixed-flow lanes on nine of the sixteen directional freeway segments analyzed operate at an unacceptable LOS F during at least one of the two peak hours evaluated. For HOV lanes, six out of eight freeway segments currently operate at an unacceptable LOS F during at least one of the two peak hours assessed.

TABLE 4.13-10 EXISTING FREEWAY LEVELS OF SERVICE (SR 17)

					Mixed-Flow Lane					HOV Lane				
#	Freeway	Segment	Dir	Peak Hour	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS
#1)	SR 17	Saratoga Ave to Lark Ave	NB	AM	42	2	4,200	50	E	–	–	–	–	–
				PM	66	2	3,170	24	C	–	–	–	–	–
#2)	SR 17	Lark Ave to SR 85	NB	AM	64	2	4,100	32	D	–	–	–	–	–
				PM	66	2	2,640	20	C	–	–	–	–	–
#3)	SR 17	SR 85 to San Tomas Exp-Camden Ave	NB	AM	66	3	4,760	24	C	–	–	–	–	–
				PM	66	3	3,770	19	C	–	–	–	–	–
#4)	SR 17	San Tomas Exp-Camden Ave to Hamilton Ave	NB	AM	40	3	6,240	52	E	–	–	–	–	–
				PM	67	3	3,600	18	B	–	–	–	–	–
#5)	SR 17	Hamilton Ave to San Tomas Exp-Camden Ave	SB	AM	66	3	4,490	20	C	–	–	–	–	–
				PM	65	3	6,860	31	D	–	–	–	–	–
#6)	SR 17	San Tomas Exp-Camden Ave to SR 85	SB	AM	66	3	3,770	19	C	–	–	–	–	–
				PM	66	3	4,950	25	C	–	–	–	–	–
#7)	SR 17	SR 85 to Lark Ave	SB	AM	66	2	2,510	19	C	–	–	–	–	–
				PM	**24**	**2**	**3,560**	**74**	**F**	–	–	–	–	–
#8)	SR 17	Lark Ave to Saratoga Ave	SB	AM	38	2	4,110	54	E	–	–	–	–	–
				PM	**25**	**2**	**3,650**	**73**	**F**	–	–	–	–	–

Notes: **Bold** indicates segment operating at LOS F conditions; NB = northbound; SB = southbound; – indicates no HOV lane provided on segment
a. 2016 CMP Monitoring and Conformance Report, Santa Clara Valley Transportation Authority, 2016.
Source: W-Trans, 2018.

TABLE 4.13-11 EXISTING FREEWAY LEVELS OF SERVICE (SR 85)

					Mixed-Flow Lane					HOV Lane				
#	Freeway	Segment	Dir	Peak Hour	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS	Avg. Speed[a]	# of Lanes	Volume[a]	Density	LOS
#9)	SR 85	Union Ave to Bascom Ave	NB	AM	**17**	**2**	**3,100**	**91**	**F**	**14**	**1**	**1,400**	**100**	**F**
				PM	66	2	3,170	24	C	70	1	980	14	B
#10)	SR 85	Bascom Ave to SR 17	NB	AM	**10**	**2**	**2,280**	**114**	**F**	**10**	**1**	**1,160**	**116**	**F**
				PM	67	2	2,130	16	B	70	1	1,540	22	C
#11)	SR 85	SR 17 to Winchester Blvd	NB	AM	**10**	**2**	**2,340**	**117**	**F**	**9**	**1**	**1,100**	**122**	**F**
				PM	67	2	2,000	15	B	70	1	560	8	A
#12)	SR 85	Winchester Blvd to Saratoga Ave	NB	AM	**21**	**2**	**3,410**	**81**	**F**	**29**	**1**	**1,890**	**65**	**F**
				PM	65	2	4,030	31	D	70	1	700	10	A
#13)	SR 85	Saratoga Ave to Winchester Blvd	SB	AM	66	2	3,170	24	C	67	1	470	7	A
				PM	35	2	4,060	58	E	60	1	2,340	39	D
#14)	SR 85	Winchester Blvd to SR 17	SB	AM	67	2	1,600	12	B	67	1	670	10	A
				PM	**16**	**2**	**3,010**	**94**	**F**	50	1	2,300	46	D
#15)	SR 85	SR 17 to Bascom Ave	SB	AM	67	2	2,400	18	B	67	1	740	11	A
				PM	**9**	**2**	**2,200**	**122**	**F**	**20**	**1**	**1,760**	**88**	**F**
#16)	SR 85	Bascom Ave to Union Ave	SB	AM	66	2	2,910	22	C	67	1	470	7	A
				PM	**14**	**2**	**2,780**	**99**	**F**	**30**	**1**	**1,950**	**65**	**F**

Notes: **Bold** indicates segment operating at LOS F conditions; NB = northbound; SB = southbound; – indicates no HOV lane provided on segment
a. 2016 CMP Monitoring and Conformance Report, Santa Clara Valley Transportation Authority, 2016.
Source: W-Trans, 2018.

Background Condition Intersection Levels of Service

Background operating conditions include existing vehicle turning movements plus trips from approved developments in the study area.

Nearby approved project, that have either been approved or are currently under review and pending a decision, were identified by the City of Campbell, City of San José, and Town of Los Gatos and include:

- Medical Office Buildings at 250 East Hacienda Avenue
- North Forty Specific Plan – Project Alternative A
- Samaritan Medical Campus Development Plan
- Cresleigh Homes Mixed Use Development (under review)
- Office Building at 95 East Hamilton Avenue

Although the Cresleigh Homes Mixed Use Development and Office Building at 95 East Hamilton Avenue are not near the proposed project site, trips from these two projects are included with the Background Conditions because of their proximity to the study intersections of San Tomas Expressway/Hamilton Avenue and San Tomas Expressway/Campbell Avenue.

With traffic associated with each of these projects added to existing volumes, all the study intersections are expected to continue operating at acceptable service levels except for the following intersections and periods (see Table 4.13-12):

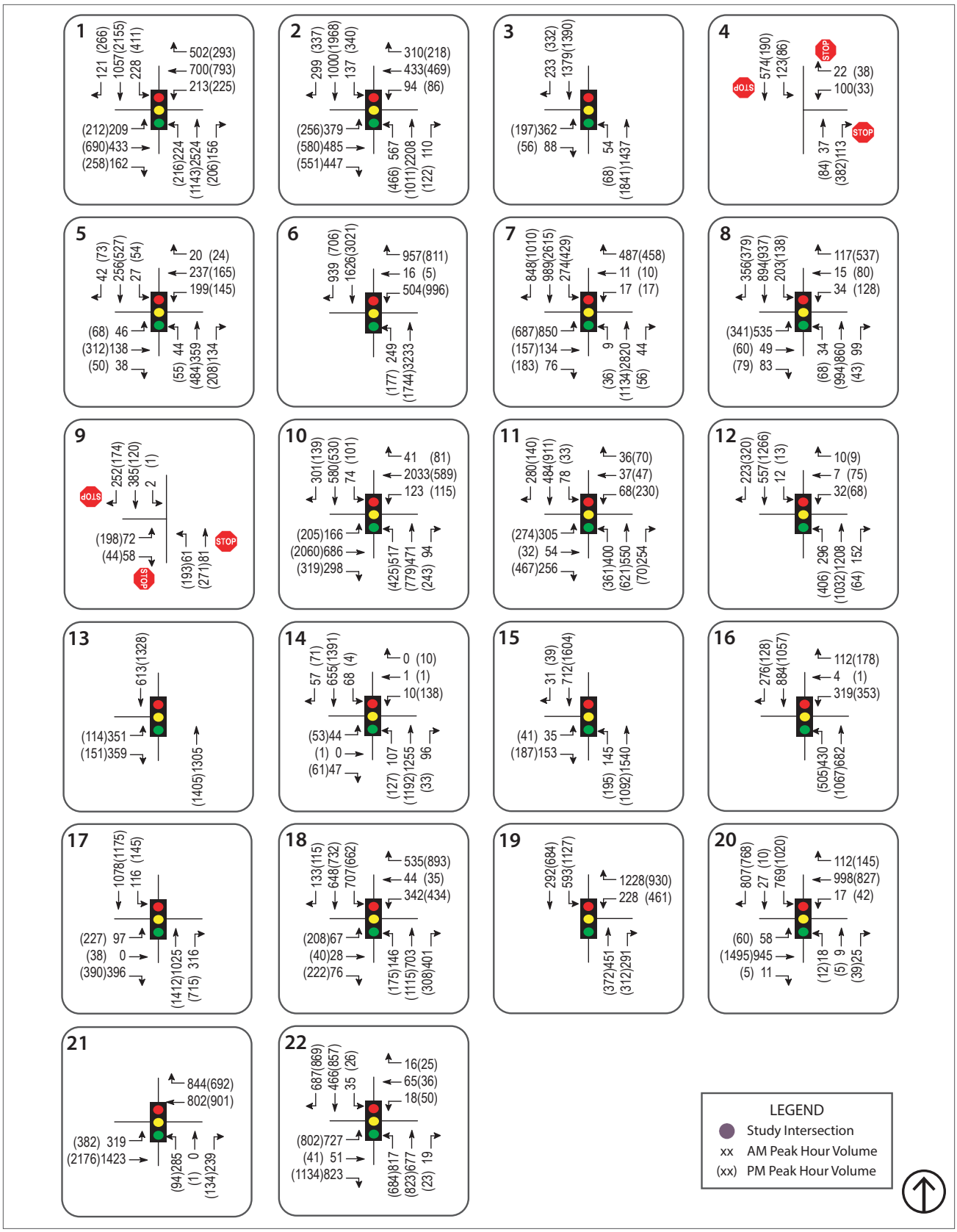
- #2) San Tomas Expressway/Campbell Avenue during both the AM and PM peak hours (LOS F).
- #6) San Tomas Expressway/SR 17 Southbound (SB) Ramps during the AM peak hour (LOS F).
- #7) Camden Avenue/White Oaks Road-Curtner Avenue during the AM peak hour (LOS F).
- #18) Los Gatos Boulevard/Burton Road-Samaritan Drive during the PM peak hour (LOS F).
- #22) Los Gatos Boulevard/Lark Avenue during the PM peak hour (LOS F).

Background intersection levels of service are summarized in Table 4.13-12 and Background condition volumes are shown in Figure 4.13-6.

TABLE 4.13-12 BACKGROUND PEAK HOUR INTERSECTION LEVELS OF SERVICE

		AM Peak		PM Peak	
	Study Intersection	Avg Delay	LOS	Avg Delay	LOS
#1)	San Tomas Exp/Hamilton Ave (CMP)	60.3	E	60.0	E
#2)	San Tomas Exp/Campbell Ave (CMP)	**84.2**	**F**	**109.2**	**F**
#3)	Winchester Blvd/W. Sunnyoaks Ave	18.7	B-	11.9	B+
#4)	Dell Ave/E. Sunnyoaks Ave	34.4	D	10.2	B+
#5)	Bascom Ave/Curtner Ave (CMP)	32.9	C-	38.4	D+
#6)	San Tomas Exp/SR 17 SB Ramps (CMP)	**93.0**	**F**	68.9	E
#7)	Camden Ave/White Oaks Rd-Curtner Ave (CMP)	**93.0**	**F**	49.9	D
#8)	Winchester Blvd/W. Hacienda Ave	28.2	C	40.6	D
#9)	Dell Ave/Hacienda Ave	15.6	C	14.1	B
#10)	Bascom Ave/Camden Ave (CMP)	57.1	E+	50.7	D
#11)	Winchester Blvd/Knowles Dr	30.5	C	39.0	D
#12)	Winchester Blvd/SR 85 NB Ramp	11.9	B+	21.3	C+
#13)	Winchester Blvd/SR 85 SB Ramp	13.8	B	6.4	A
#14)	Winchester Blvd/Albright Wy	9.1	A	11.2	B+
#15)	Winchester Blvd/Wimbledon Dr	11.9	B+	15.1	B
#16)	Bascom Ave/SR 85 NB Ramps (CMP)	23.3	C	23.6	C
#17)	Bascom Ave/SR 85 SB Ramps (CMP)	25.3	C	27.0	C
#18)	Los Gatos Blvd/Burton Rd-Samaritan Dr (CMP)	36.1	D+	**106.9**	**F**
#19)	Winchester Blvd/Lark Ave	28.6	C	16.1	B
#20)	SR 17 SB Ramp/Lark Ave	30.4	C	40.8	D
#21)	SR 17 NB Ramp/Lark Ave	20.7	C+	13.5	B
#22)	Los Gatos Blvd/Lark Ave (CMP)	77.9	E-	**91.4**	**F**

Notes: **BOLD** = unacceptable LOS; delay is measured in average seconds per vehicle; LOS = Level of Service
Source: W-Trans, 2018.



Source: W-Trans, 2019.

Figure 4.13-6
Background Conditions Traffic Volumes

Cumulative Condition Intersection Levels of Service

Recent AM and PM peak hour forecasts from the Santa Clara County Travel Demand model were provided by VTA in June 2018 and reviewed for roadway segments within the vicinity of the study area. The 2015 and 2040 growth forecasts (roadway segment link volumes) were used to derive an annual growth rate of 0.54 percent for the AM and 0.53 percent for the PM peak hours. Since this growth rate was based on the County Travel Demand model, it accounts for any potential future developments not yet identified or approved, overall regional traffic growth and regional roadway capacity improvements (such as the SR 85 Express Lane Project). These growth rates were applied to existing volumes for both the AM and PM peak hours to forecast the Cumulative condition future traffic demand. Use of the Santa Clara County Travel Demand model is consistent with Section 11.1.2 of the *VTA Transportation Impact Analysis Guidelines* and provides a reasonable growth profile for expected traffic demands for the future year analysis.

It was assumed that the existing roadway network would not undergo any widening improvements at the study intersections and the intersection geometry for the Existing condition would remain unchanged for the cumulative condition.

Under the anticipated Cumulative volumes (without any roadway network improvements), the study intersections would be expected to continue operating at acceptable Levels of Service, except for the following intersections and periods (see Table 4.13-13):

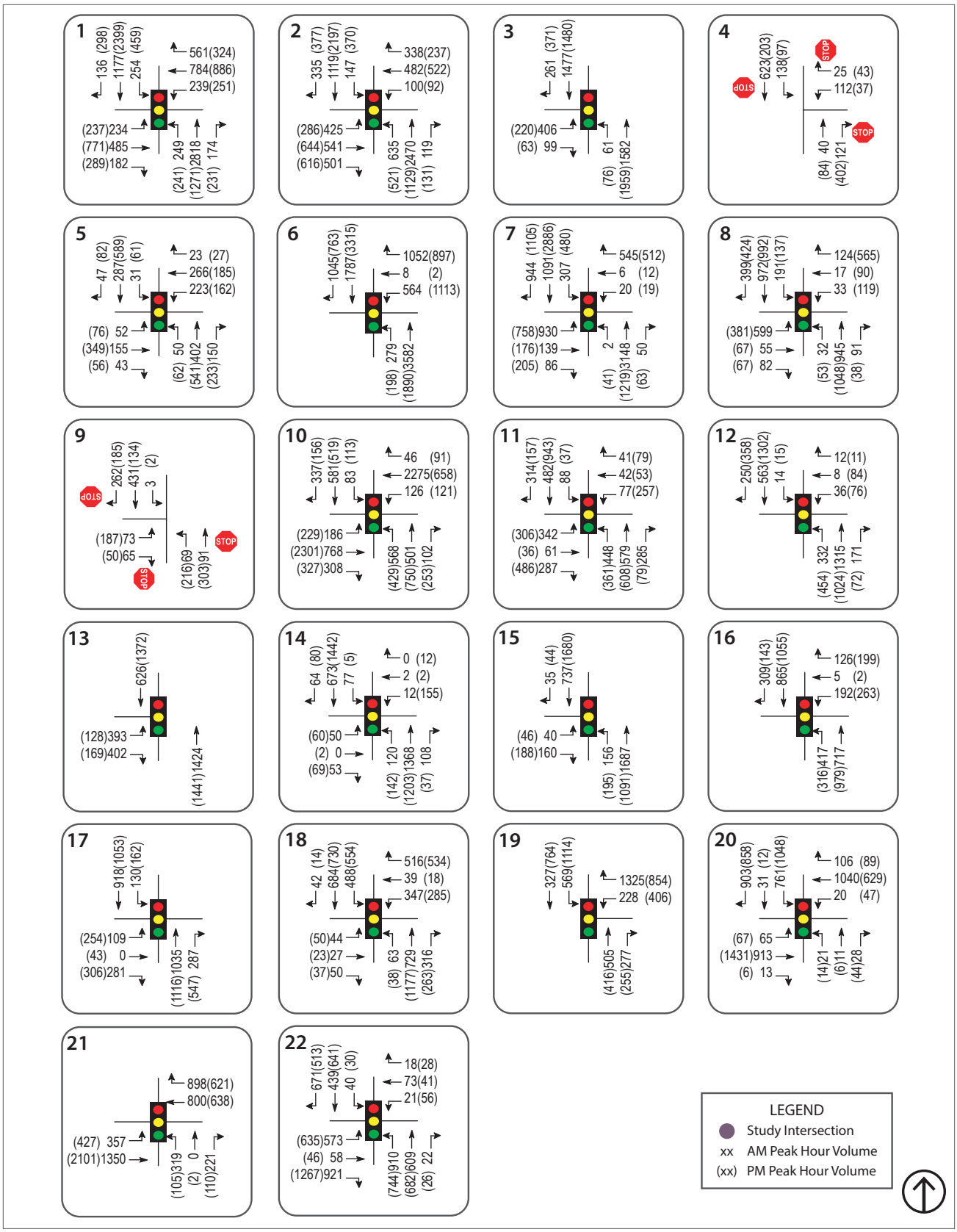
- #1) San Tomas Expressway/Hamilton Avenue during both the AM and PM peak hours (LOS F).
- #2) San Tomas Expressway/Campbell Avenue during both the AM and PM peak hours (LOS F).
- #4) Dell Avenue/E. Sunnyoaks Avenue during the AM peak hour (LOS F).
- #6) San Tomas Expressway/SR 17 SB Ramps during the AM peak hour (LOS F).
- #7) Camden Avenue/White Oaks Road-Curtner Avenue during the AM peak hour (LOS F).

Cumulative traffic volumes are summarized in Table 4.13-13 and shown in Figure 4.13-7.

TABLE 4.13-13 CUMULATIVE PEAK HOUR INTERSECTION LEVELS OF SERVICE

		AM Peak		PM Peak	
	Study Intersection	Avg Delay	LOS	Avg Delay	LOS
#1)	San Tomas Exp/Hamilton Ave (CMP)	**107.5**	**F**	**99.1**	**F**
#2)	San Tomas Exp/Campbell Ave (CMP)	**116.9**	**F**	**143.2**	**F**
#3)	Winchester Blvd/W. Sunnyoaks Ave	20.2	C+	12.8	B
#4)	Dell Ave/E. Sunnyoaks Ave	**53.3**	**F**	10.7	B
#5)	Bascom Ave/Curtner Ave (CMP)	33.1	C-	38.7	D+
#6)	San Tomas Exp/SR 17 SB Ramps (CMP)	**111.3**	**F**	79.7	E-
#7)	Camden Ave/White Oaks Rd-Curtner Ave (CMP)	**124.2**	**F**	57.3	E+
#8)	Winchester Blvd/W. Hacienda Ave	29.0	C	45.1	D
#9)	Dell Ave/Hacienda Ave	19.5	C	16.3	C
#10)	Bascom Ave/Camden Ave (CMP)	64.0	E	51.4	D-
#11)	Winchester Blvd/Knowles Dr	31.1	C	41.8	D
#12)	Winchester Blvd/SR 85 NB Ramp	12.3	B	25.8	C
#13)	Winchester Blvd/SR 85 SB Ramp	14.9	B	7.0	A
#14)	Winchester Blvd/Albright Wy	9.7	A	12.7	B
#15)	Winchester Blvd/Wimbledon Dr	12.2	B	15.9	B
#16)	Bascom Ave/SR 85 NB Ramps (CMP)	21.1	C+	21.9	C+
#17)	Bascom Ave/SR 85 SB Ramps (CMP)	21.9	C+	26.0	C
#18)	Los Gatos Blvd/Burton Rd-Samaritan Dr (CMP)	33.2	C-	34.1	C-
#19)	Winchester Blvd/Lark Ave	41.8	D	15.5	B
#20)	SR 17 SB Ramp/Lark Ave	30.5	C	40.6	D
#21)	SR 17 NB Ramp/Lark Ave	24.1	C	13.2	B
#22)	Los Gatos Blvd/Lark Ave (CMP)	72.0	E	42.9	D

Notes: **BOLD** = unacceptable LOS; delay is measured in average seconds per vehicle; LOS = Level of Service, SB = southbound
Source: W-Trans, 2018.



Source: W-Trans, 2019.

Figure 4.13-7
Cumulative Conditions Traffic Volumes

4.13.2 IMPACT DISCUSSION

4.13.2.1 STANDARDS OF SIGNIFICANCE

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in Section 4.13.2.2 uses the following standards of significance. The project would result in a significant transportation and traffic impact if it would:

1. 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, 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.
2. 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.
3. 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. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
5. Result in inadequate emergency access.
6. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

For the analysis of transportation impacts, more specific criteria are needed to determine whether significant impacts would occur. This Draft EIR applies the significance criteria as discussed below to evaluate the impacts of the project per the standards of significance listed above. The following criteria, based on the guidelines from the City of Campbell, City of San José, Town of Los Gatos, and VTA, were used to determine whether the proposed project would result in a significant impact to the transportation system.

Santa Clara County Valley Transportation Authority

The VTA has established criteria to determine the level of significance of traffic impacts based on standards set by the Santa Clara County CMP in the *Transportation Impact Analysis Guidelines*, adopted in October 2014 which states that significant traffic impacts at signalized CMP intersections are defined to occur when the addition of project-generated trips causes one of the following:

- For intersection operations deteriorate from LOS E (or better) to LOS F; or
- For intersections operating at LOS F under background or cumulative conditions, the project condition increases the average control delay for critical movements by four seconds or more and project traffic increases the critical volume-to-capacity (v/c)[2] ratio by 0.01 or more.

For a CMP freeway segment, a significant impact for a project is defined as:

- When addition of project traffic under the project condition causes a freeway segment LOS to deteriorate from LOS E (or better) to LOS F; or
- If a freeway segment already operates at LOS F, and under the project condition scenario, traffic increases by 1 percent or more of capacity.

City of Campbell

For local signalized intersections not on the CMP network, a traffic impact is considered significant if:

- The addition of project-generated traffic causes operation of an intersection to deteriorate from an acceptable level of service (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.

For unsignalized intersections , the City of Campbell does not have a formally adopted minimum threshold for. Thus, for the purposes of this report, a traffic impact is considered significant if the addition of project-generated traffic causes operation of an unsignalized intersection to deteriorate from an acceptable level of service (LOS E or better) to LOS F in combination with the satisfaction of the peak hour traffic warrant as defined in the *California Manual on Uniform Traffic Control Devices* (CA-MUTCD).

City of San José

Significant traffic impacts at signalized intersections are defined to occur when the addition of project-generated trips causes one of the following:

- Intersection operations deteriorate from an acceptable LOS D or better to an unacceptable LOS E or F.

[2] Volume-to-Capacity (v/c) is a measure that reflects the mobility and quality of travel within a roadway facility. It compares the number of vehicles using the roadway to the theoretical capacity of that facility. For example, a v/c of 1.00 indicates the facility is operating at its capacity while a higher v/c ratio would indicate that the facility is operating above its capacity.

- Critical delay increases four seconds or more and the V/C ratio increases 0.01 or more at 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 (LOS E or F).

The Town of Los Gatos guidelines listed above apply to signalized intersections only.

Caltrans

In the *Guide for the Preparation of Traffic Impact Studies* (2002), Caltrans indicates that they endeavor to maintain operation at the transition from LOS C to LOS D for all its facilities. Where an existing facility is operating at less than LOS C/D threshold, the existing measure of effectiveness should be maintained.

4.13.2.2 IMPACT ANALYSIS

The following impact discussion analyzes the project's impact using the standards of significance and criteria identified in Section 4.13.2.1 above.

TRANS-1	**The proposed project 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.**

This section focuses on impacts associated with vehicular travel, including level-of-service impacts at intersections and on freeway segments, queuing at freeway ramps, and potential intrusion into neighborhood roadways. Impacts associated with bicycle, pedestrian, and transit modes are addressed under impact discussion TRANS-6.

Intersections

Traffic conditions at study intersections were evaluated under Existing plus Project, Background plus Project, and Cumulative plus Project conditions. The following discussion describes the potential impacts with the project under each scenario.

Existing plus Project Conditions

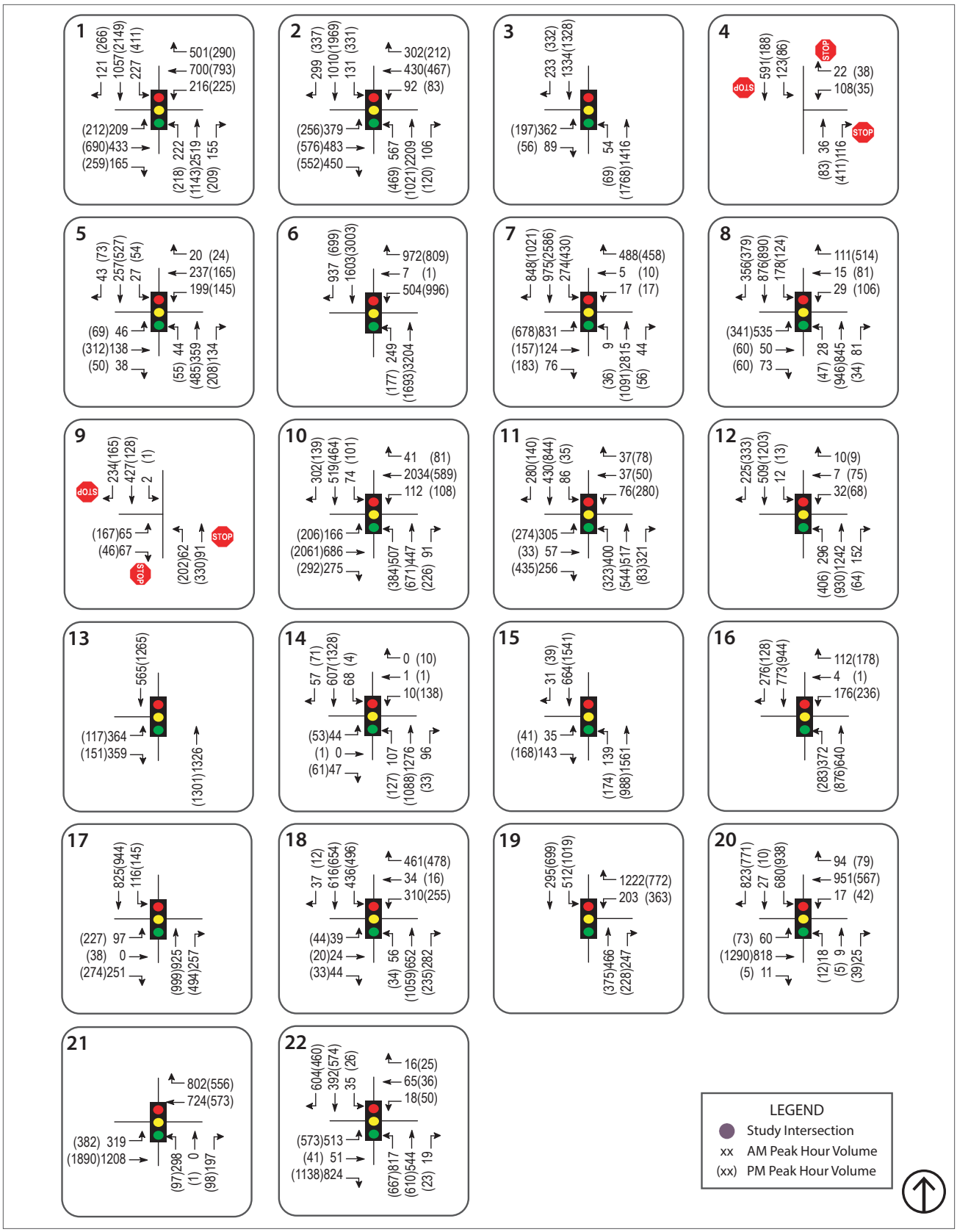
Upon the addition of project-related traffic to the Existing volumes, all the study intersections are expected to continue operating at the same Levels of Service as without the project-generated trips, except that the intersection of Winchester Boulevard/W. Sunnyoaks Avenue (Intersection #3) would improve from LOS C+ to B-, Dell Avenue/E. Sunnyoaks Avenue (Intersection #4) is expected to deteriorate from E to LOS F during the AM peak hour and Dell Avenue/Hacienda Avenue (Intersection #9) would drop from D to LOS F operation during the PM peak hour. Existing plus Project traffic volumes are shown in Figure 4.13-8. These results are summarized in Table 4.13-14.

The intersection level of service at Winchester Boulevard/W. Sunnyoaks Avenue (Intersection #3) would improve from LOS C+ to LOS B. This condition occurs when a project adds trips to movements that are currently underutilized or have delays that are below the intersection average, resulting in a better balance between intersection approaches and lower overall average delay. The conclusion could incorrectly be drawn that the project actually improves operation based on this data alone; however, it is more appropriate to conclude that the project trips are expected to make use of excess capacity, so drivers will experience little, if any, change in conditions as a result of the project.

Although, as noted above, the LOS would improve, there would be no change in average vehicle delay with the addition of project-generated trips. Because of mathematical rounding default settings in the TRAFFIX analysis software, both average delay results are presented as 20.0 seconds per vehicle. However, it is more likely that the Existing condition is slightly more than 20.0 seconds per vehicle and the Existing plus Project condition is slightly less than 20.0 seconds per vehicle. According to the LOS thresholds summarized in Table 4.13-4, an average delay between 18.0 and 20.0 seconds of delay is considered to be an LOS B- and an average delay between 20.0 and 23.0 seconds of delay is an LOS C+.

The addition of project-generated vehicle trips would cause the level of service to deteriorate from LOS D or E to an unacceptable LOS F at the unsignalized intersections of Dell Avenue/E. Sunnyoaks Avenue (Intersection #4) during the AM peak hour and Dell Avenue/Hacienda Avenue (Intersection #9) during the PM peak hour. However, since these intersections do not satisfy the peak hour volume warrant, they are not considered a significant impact.

During the AM peak hour, the intersection of San Tomas Expressway/SR 17 SB Ramps (Intersection #6) would be expected to continue operating at an unacceptable LOS F with or without the addition of project-generated vehicle trips. However, the addition of project-generated trips would increase the volume-to-capacity ratios by more than 0.01 and increase the average control delay for critical movements by more than four seconds. Therefore, the project's contribution would result in a *significant* impact at this intersection (see Impact TRANS-1a and Mitigation Measure TRANS-1a below).



Source: W-Trans, 2019.

Figure 4.13-8
Existing Plus Project Traffic Volumes

TABLE 4.13-14 EXISTING AND EXISTING PLUS PROJECT PEAK HOUR INTERSECTION LEVELS OF SERVICE

		Existing Conditions				Existing + Project			
		AM Peak		PM Peak		AM Peak		PM Peak	
	Study Intersection	Avg Delay	LOS	Avg Delay	LOS	Avg Delay	LOS	Avg Delay	LOS
#1)	San Tomas Exp/Hamilton Ave (CMP)	59.9	E+	59.8	E+	60.0	E+	59.8	E+
#2)	San Tomas Exp/Campbell Ave (CMP)	66.1	E	**87.9**	**F**	66.2	E	**88.0**	**F**
#3)	Winchester Blvd/W. Sunnyoaks Ave	20.0	C+	12.4	B	20.0	B-	12.4	B
#4)	Dell Ave/E. Sunnyoaks Ave	48.3	E	11.0	B	**62.2**	**F**	11.9	B
#5)	Bascom Ave/Curtner Ave (CMP)	32.9	C-	38.4	D+	34.3	C-	38.4	D+
#6)	San Tomas Exp/SR 17 SB Ramps (CMP)	**90.4**	**F**	68.3	E	**95.7**	**F**	69.0	E
	With Westbound Approach Widening	-	-	-	-	44.7	D	38.3	D+
#7)	Camden Ave/White Oaks Rd-Curtner Ave (CMP)	**90.8**	**F**	49.1	D	**90.9**	**F**	49.1	D
#8)	Winchester Blvd/W. Hacienda Ave	28.8	C	40.3	D	29.0	C	41.0	D
#9)	Dell Ave/Hacienda Ave	17.9	C	32.9	D	22.2	C	**56.4**	**F**
#10)	Bascom Ave/Camden Ave (CMP)	56.4	E+	49.0	D	56.4	E+	49.0	D
#11)	Winchester Blvd/Knowles Dr	30.8	C	39.2	D	30.8	C	41.8	D
#12)	Winchester Blvd/SR 85 NB Ramp	12.2	B	25.0	C	12.2	B	26.6	C
#13)	Winchester Blvd/SR 85 SB Ramp	15.8	B	6.8	A	16.2	B	6.8	A
#14)	Winchester Blvd/Albright Wy	9.3	A	11.7	B+	9.1	A	11.6	B+
#15)	Winchester Blvd/Wimbledon Dr	11.8	B+	13.7	B	11.7	B+	13.8	B
#16)	Bascom Ave/SR 85 NB Ramps (CMP)	20.7	C+	21.4	C+	20.7	C+	21.4	C+
#17)	Bascom Ave/SR 85 SB Ramps (CMP)	21.2	C+	24.8	C	21.2	C+	24.7	C
#18)	Los Gatos Blvd/Burton Rd-Samaritan Dr (CMP)	32.1	C-	32.2	C-	32.1	C-	32.2	C-
#19)	Winchester Blvd/Lark Ave	28.6	C	15.1	B	32.5	C-	15.1	B
#20)	SR 17 SB Ramp/Lark Ave	30.5	C	36.0	D+	30.5	C	36.2	D+
#21)	SR 17 NB Ramp/Lark Ave	20.9	C+	12.9	B	21.4	C+	12.9	B
#22)	Los Gatos Blvd/Lark Ave (CMP)	50.0	D	37.1	D+	50.9	D	37.2	D+

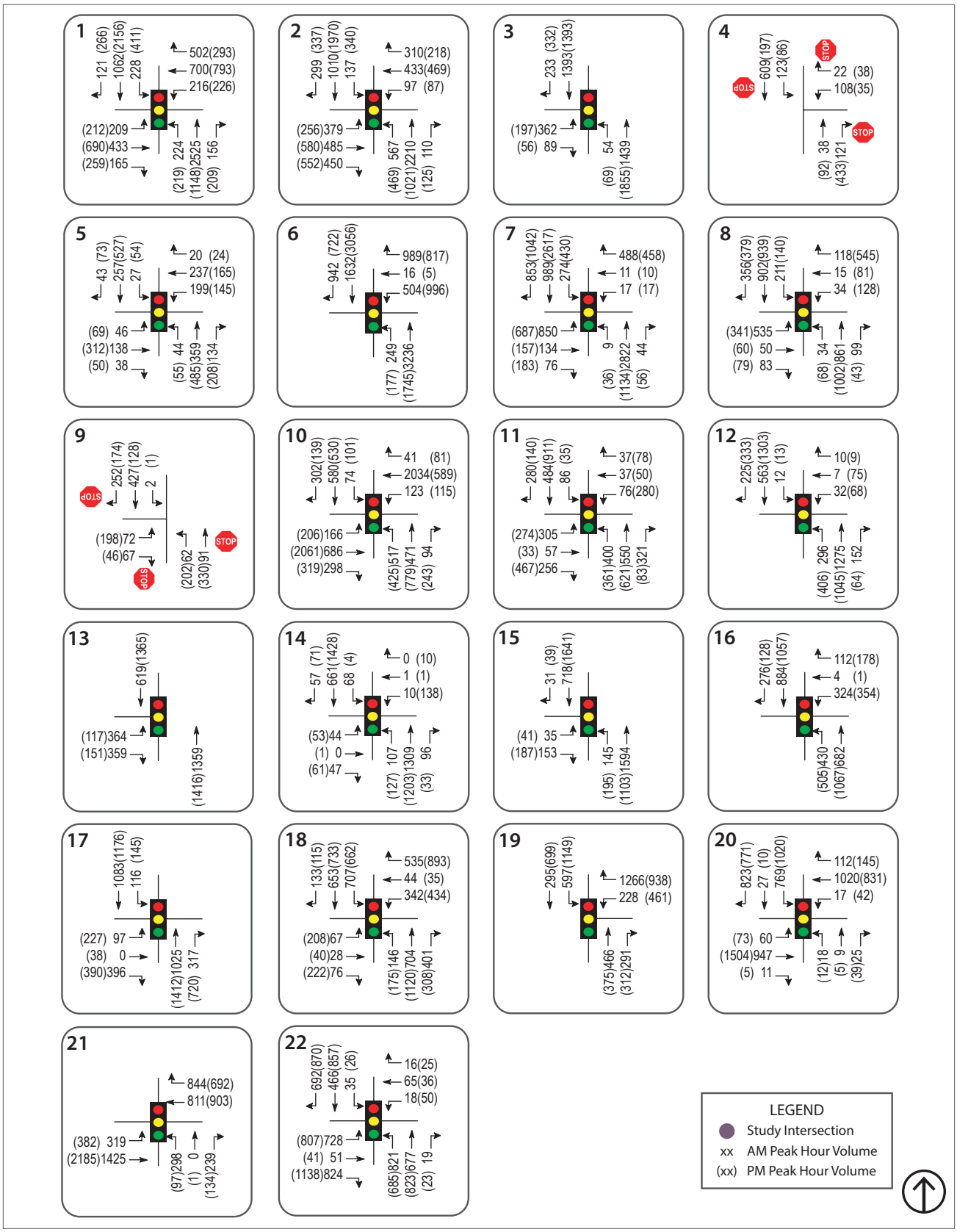
Notes: **BOLD** = unacceptable LOS; Shaded indicates mitigated conditions; delay is measured in average seconds per vehicle; LOS = Level of Service
Source: W-Trans, 2018.

Background plus Project Conditions

Upon the addition of project-related traffic to the Background condition volumes, all the study intersections are expected to continue operating at the same Levels of Service as without the project-generated trips, except that Dell Avenue/E. Sunnyoaks Avenue (Intersection #4) is expected to drop from LOS D to LOS E operation during the AM peak hour and Dell Avenue/Hacienda Avenue (Intersection #9) would drop from LOS B to LOS C during the PM peak hour. Background plus Project traffic volumes are shown in Figure 4.13-9. These results are summarized in Table 4.13-15.

The intersections of San Tomas Expressway/Campbell Avenue (Intersection #2), Camden Avenue/White Oaks Road-Curtner Avenue (Intersection #7), Los Gatos Boulevard/Burton Road-Samaritan Drive (Intersection #18), and Los Gatos Boulevard/Lark Avenue (#22) would operate at LOS F for one or both peak periods. However, these are not considered a significant impact because they do not satisfy the conditions described by the VTA *Transportation Impact Analysis Guidelines* (namely, the volume-to-capacity ratio would not increase by more than 0.01 or the average control delay for critical movements does not increase by more than four seconds).

For the AM peak hour, the intersection of San Tomas Expressway/SR 17 Southbound (SB) Ramps (Intersection #6) would operate at an unacceptable LOS F with or without the addition of project-generated vehicle trips. The addition of project-generated trips would increase the volume-to-capacity ratios by more than 0.01 and increase the average control delay for critical movements by more than four seconds. Therefore, the project's contribution would result in a *significant* impact at this intersection (see Impact TRANS-1a and Mitigation Measure TRANS-1a below).



Source: W-Trans, 2019.

Figure 4.13-9

Background Plus Project Conditions Traffic Volumes

TABLE 4.13-15 BACKGROUND AND BACKGROUND PLUS PROJECT PEAK HOUR INTERSECTION LEVELS OF SERVICE

		Background Conditions				Background + Project			
		AM Peak		PM Peak		AM Peak		PM Peak	
	Study Intersection	Avg Delay	LOS	Avg Delay	LOS	Avg Delay	LOS	Avg Delay	LOS
#1)	San Tomas Exp/Hamilton Ave (CMP)	60.3	E	60.0	E	60.3	E	60.1	E
#2)	San Tomas Exp/Campbell Ave (CMP)	**84.2**	**F**	**109.2**	**F**	**84.4**	**F**	**109.4**	**F**
#3)	Winchester Blvd/W. Sunnyoaks Ave	18.7	B-	11.9	B+	18.7	B-	11.9	B+
#4)	Dell Ave/E. Sunnyoaks Ave	34.4	D	10.2	B+	43.8	E	10.8	B
#5)	Bascom Ave/Curtner Ave (CMP)	32.9	C-	38.4	D+	34.3	C-	38.4	D+
#6)	San Tomas Exp/SR 17 SB Ramps (CMP)	**93.0**	**F**	68.9	E	**98.4**	**F**	69.7	E
	With Westbound Approach Widening	-	-	-	-	45.9	D	38.6	D+
#7)	Camden Ave/White Oaks Rd-Curtner Ave (CMP)	**93.0**	**F**	49.9	D	**93.1**	**F**	49.9	D
#8)	Winchester Blvd/W. Hacienda Ave	28.2	C	40.6	D	28.4	C	41.3	D
#9)	Dell Ave/Hacienda Ave	15.6	C	14.1	B	18.5	C	16.9	C
#10)	Bascom Ave/Camden Ave (CMP)	57.1	E+	50.7	D	57.1	E+	50.7	D
#11)	Winchester Blvd/Knowles Dr	30.5	C	39.0	D	30.4	C	41.6	D
#12)	Winchester Blvd/SR 85 NB Ramp	11.9	B+	21.3	C+	11.8	B+	22.1	C+
#13)	Winchester Blvd/SR 85 SB Ramp	13.8	B	6.4	A	13.9	B	6.4	A
#14)	Winchester Blvd/Albright Wy	9.1	A	11.2	B+	8.9	A	11.1	B+
#15)	Winchester Blvd/Wimbledon Dr	11.9	B+	15.1	B	11.9	B+	15.3	B
#16)	Bascom Ave/SR 85 NB Ramps (CMP)	23.3	C	23.6	C	23.4	C	23.6	C
#17)	Bascom Ave/SR 85 SB Ramps (CMP)	25.3	C	27.0	C	25.3	C	26.9	C
#18)	Los Gatos Blvd/Burton Rd-Samaritan Dr (CMP)	36.1	D+	**106.9**	**F**	36.1	D+	**107.2**	**F**
#19)	Winchester Blvd/Lark Ave	28.6	C	16.1	B	32.5	C-	16.2	B
#20)	SR 17 SB Ramp/Lark Ave	30.4	C	40.8	D	30.4	C	41.2	D
#21)	SR 17 NB Ramp/Lark Ave	20.7	C+	13.5	B	21.2	C+	13.5	B
#22)	Los Gatos Blvd/Lark Ave (CMP)	77.9	E-	**91.4**	**F**	79.3	E-	**92.1**	**F**

Notes: **BOLD** = unacceptable LOS; Shaded indicates mitigated conditions; delay is measured in average seconds per vehicle; LOS = Level of Service
Source: W-Trans, 2018.

Cumulative plus Project Conditions

Upon the addition of project-generated traffic to the anticipated Cumulative volumes, all the study intersections would be expected to continue operating at the same levels of service as without the project-generated trips. Because the increase in delay at intersections already expected to operate at LOS F without the project is less than four seconds, the impact is considered less than significant except at San Tomas Expressway/SR 17 SB Ramps (Intersection #6). Cumulative plus Project traffic volumes are shown in Figure 4.13-10. The Cumulative plus Project operating conditions are summarized in Table 4.13-16.

The unsignalized intersection of Dell Avenue/E. Sunnyoaks Avenue (Intersection #4) would operate at an unacceptable LOS F with or without the addition of project-generated vehicle trips during the AM peak hour. However, since this intersection does not satisfy the peak hour volume warrant for the AM peak hour, it is not considered a significant impact.

The intersections of San Tomas Expressway/Hamilton Avenue (Intersection #1), San Tomas Expressway/Campbell Avenue (Intersection #2), and Camden Avenue/White Oaks Road-Curtner Avenue (Intersection #7) would operate at LOS F for one or both peak periods. However, these are not considered a significant impact because they do not satisfy the conditions described by the VTA *Transportation Impact Analysis Guidelines* (namely, the volume-to-capacity ratio would not increase by more than 0.01 or the average control delay for critical movements does not increase by more than four seconds).

For the AM peak hour, the intersection of San Tomas Expressway/SR 17 SB Ramps (Intersection #6) would operate at an unacceptable LOS F with or without the addition of project-generated vehicle trips. The addition of project-generated trips would increase the volume-to-capacity ratios by more than 0.01 and increase the average control delay for critical movements by more than four seconds. Therefore, the project's contribution would result in a *significant* impact at this intersection.

Similarly, for the PM peak hour, the intersection of San Tomas Expressway/SR 17 SB Ramps (Intersection #6) would worsen from LOS E to LOS F with the addition of project-generated vehicle trips. Therefore, the project's contribution would result in a *significant* impact at this intersection (see Impact TRANS-1a and Mitigation Measure TRANS-1a below).

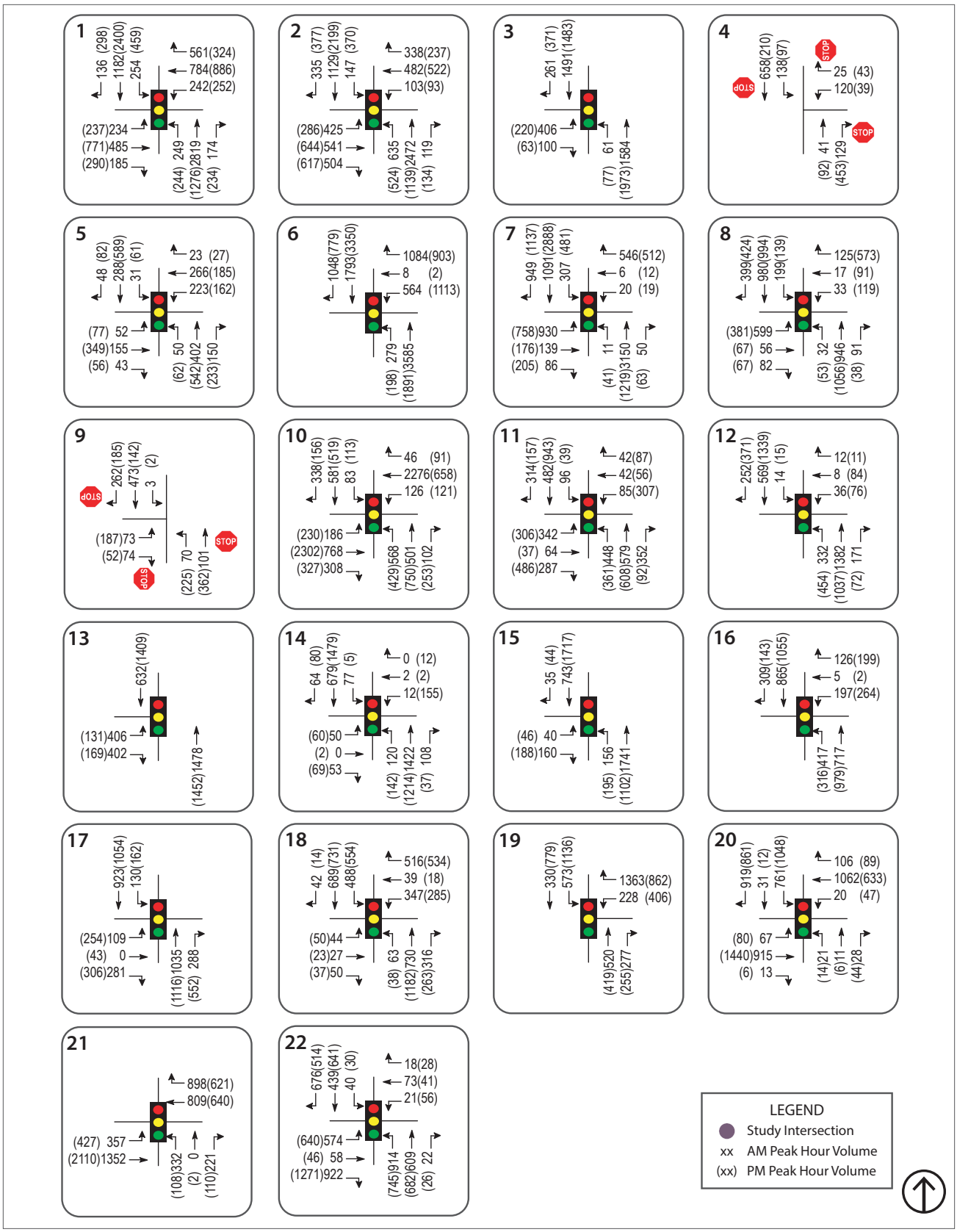
Significance without Mitigation: Significant.

Impact TRANS-1a: During the AM peak hour under Existing plus Project, Background plus Project, and Cumulative plus Project conditions, the intersection of San Tomas Expressway/SR 17 Southbound Ramps (Intersection #6) would continue to operate at an unacceptable LOS F with or without the addition of project-generated vehicle trips. However, the addition of project-generated trips would increase the volume-to-capacity ratios by more than 0.01 and increase the average control delay for critical movements by more than four seconds. During the PM peak hour under Cumulative plus Project conditions, this intersection would worsen from LOS E to LOS F with the addition of project-generated vehicle trips. During the AM and PM peak hours under Cumulative plus Project conditions, the queue on the SR 17 southbound off-ramp right-turn lane would extend to 26 vehicles, which is two vehicles more than the estimated storage capacity.

Mitigation Measure TRANS-1a: The recommended mitigation measure would be to widen the westbound (off-ramp) approach at the intersection of the San Tomas Expressway/SR 17 southbound ramps (Intersection #6) to include a second right turn lane, resulting in two left-turn lanes, one through shared left-turn lane, and two right-turn lanes (with the right-turn-on-red (RTOR) movement prohibited). Also, the right-turn lane should be extended by 50 linear feet (plus a 120-foot transition taper) for the off-ramp to accommodate the anticipated vehicle queuing. Extension of the existing right-turn lane would include modification of the roadway pavement, pavement striping, metal beam guardrails and roadside embankment to accommodate the added length.

However, 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. The SR 17 off-ramp is a Caltrans facility and any improvements to the off-ramp would be within the Caltrans right-of-way. Additionally, as San Tomas Expressway is a County-operated route and part of the CMP network, any modifications to the intersection would require coordination and approval from Caltrans, the County of Santa Clara, and the VTA. This mitigation measure is not part of VTA's current VTA Measure B regional improvements list. As such, given these limits on feasibility, including physical constraints and the need for inter-jurisdictional approval, the project's impact is considered to be significant and unavoidable.

Significance with Mitigation: Significant and unavoidable.



Source: W-Trans, 2019.

Figure 4.13-10
Cumulative Plus Project Conditions Traffic Volumes

TABLE 4.13-16 CUMULATIVE AND CUMULATIVE PLUS PROJECT PEAK HOUR INTERSECTION LEVELS OF SERVICE

		Cumulative Conditions				Cumulative + Project			
		AM Peak		PM Peak		AM Peak		PM Peak	
	Study Intersection	Avg Delay	LOS	Avg Delay	LOS	Avg Delay	LOS	Avg Delay	LOS
#1)	San Tomas Exp/Hamilton Ave (CMP)	**107.5**	**F**	**99.1**	**F**	**107.4**	**F**	**99.1**	**F**
#2)	San Tomas Exp/Campbell Ave (CMP)	**116.9**	**F**	**143.2**	**F**	**117.1**	**F**	**143.3**	**F**
#3)	Winchester Blvd/W. Sunnyoaks Ave	20.2	C+	12.8	B	20.2	C+	12.8	B
#4)	Dell Ave/E. Sunnyoaks Ave	**53.3**	**F**	10.7	B	**66.7**	**F**	11.4	B
#5)	Bascom Ave/Curtner Ave (CMP)	33.1	C-	38.7	D+	33.1	C-	38.7	D+
#6)	San Tomas Exp/SR 17 SB Ramps (CMP)	**111.3**	**F**	79.7	E-	**116.9**	**F**	**80.6**	**F**
	With Westbound Approach Widening	**-**	**-**	-	-	58.7	E+	42.9	D
#7)	Camden Ave/White Oaks Rd-Curtner Ave (CMP)	**124.2**	**F**	57.3	E+	**124.3**	**F**	57.4	E+
#8)	Winchester Blvd/W. Hacienda Ave	29.0	C	45.1	D	29.2	C	46.2	D
#9)	Dell Ave/Hacienda Ave	19.5	C	16.3	C	24.4	C	20.9	C
#10)	Bascom Ave/Camden Ave (CMP)	64.0	E	51.4	D-	64.1	E	51.4	D-
#11)	Winchester Blvd/Knowles Dr	31.1	C	41.8	D	31.2	C	45.2	D
#12)	Winchester Blvd/SR 85 NB Ramp	12.3	B	25.8	C	12.3	B	27.3	C
#13)	Winchester Blvd/SR 85 SB Ramp	14.9	B	7.0	A	15.1	B	7.0	A
#14)	Winchester Blvd/Albright Wy	9.7	A	12.7	B	9.5	A	12.6	B
#15)	Winchester Blvd/Wimbledon Dr	12.2	B	15.9	B	12.1	B	16.1	B
#16)	Bascom Ave/SR 85 NB Ramps (CMP)	21.1	C+	21.9	C+	21.2	C+	21.9	C+
#17)	Bascom Ave/SR 85 SB Ramps (CMP)	21.9	C+	26.0	C	21.9	C+	26.0	C
#18)	Los Gatos Blvd/Burton Rd-Samaritan Dr (CMP)	33.2	C-	34.1	C-	33.1	C-	34.2	C-
#19)	Winchester Blvd/Lark Ave	41.8	D	15.5	B	47.8	D	15.5	B
#20)	SR 17 SB Ramp/Lark Ave	30.5	C	40.6	D	30.6	C	40.9	D
#21)	SR 17 NB Ramp/Lark Ave	24.1	C	13.2	B	24.7	C	13.3	B
#22)	Los Gatos Blvd/Lark Ave (CMP)	72.0	E	42.9	D	73.4	E	43.2	D

Notes: **BOLD** = unacceptable LOS; Shaded indicate mitigated conditions; delay is measured in average seconds per vehicle; LOS = Level of Service
Source: W-Trans, 2018.

Traffic Signal Warrant Analysis

Based on projected traffic volumes for the all scenarios considered, a traffic signal is not expected to be warranted at either Dell Avenue/E. Sunnyoaks Avenue (Intersection #4) or Dell Avenue/Hacienda Avenue (Intersection #9).

The intersection of Dell Avenue/E. Sunnyoaks Avenue (Intersection #4) is projected to operate at LOS F for the AM peak hour under existing plus project, cumulative, and cumulative plus project conditions. However, the evaluation confirmed that Warrant 3 would not be satisfied by the projected volumes at the intersection of Dell Avenue/E. Sunnyoaks Avenue for any of these scenarios and therefore does not warrant a new signal.

The intersection of Dell Avenue/Hacienda Avenue (Intersection #9) is projected to operate at LOS F during the PM peak hour under existing plus project conditions. The traffic signal warrant evaluation confirmed that volumes at the intersection of Dell Avenue/Hacienda Avenue would be insufficient to satisfy Warrant 3 for any of these scenarios. Therefore, this is considered to be a *less-than-significant* impact.

It should be noted that the satisfaction of a traffic signal warrant or warrants does not, in and of itself, require the installation of a traffic control signal, as other factors (warrants) should also be considered. Copies of the Warrant 3 worksheet is provided in the technical appendix to this Draft EIR (Appendix I).

Significance without Mitigation: Less than significant.

Freeway Segments

Under Existing plus Project conditions, the mixed-flow lanes on ten of the sixteen directional freeway segments analyzed on SR 17 (see Table 4.13-17) and SR 85 (see Table 4.13-18) would operate at an unacceptable LOS F during at least one of the peak hours studied. Of these ten segments that would operate at an unacceptable level, nine were previously identified as unacceptable under existing conditions (see Tables 4.13-10 and 4.13-11). The addition of project-generated trips onto southbound SR 85 between Saratoga Avenue and Winchester Boulevard would result in a level of service change from LOS E to F. Both the Existing and Existing plus Project conditions would have six out of eight HOV lane segments on SR 17 and SR 85 that are expected to operate at an unacceptable LOS F. Therefore, the project's contribution would result in a *significant* impact at these freeway segments, as discussed further below under Impact TRANS-1b.

A summary of freeway segments and Existing plus Project condition levels of service for both SR 17 and SR 85 are provided in Table 4.13-17 and Table 4.13-18.

Significance without Mitigation: Significant.

Impact TRANS-1b: During the PM peak hour under Existing plus Project conditions, the addition of project-generated traffic would cause the freeway segment of southbound SR 85 from Saratoga Avenue to Winchester Boulevard to deteriorate from LOS E to F.

Mitigation Measure TRANS-1b: 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 not under the jurisdiction of the City of Campbell, and as such implementation cannot be assured. 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. A proportional (or fair share) contribution cannot be calculated for the project because the cost for this improvement has not been developed.

Significance with Mitigation: Significant and unavoidable.

TABLE 4.13-17 EXISTING PLUS PROJECT FREEWAY LEVELS OF SERVICE (SR 17)

					Mixed-Flow Lane					HOV Lane				
#	Freeway	Segment	Dir	Peak Hour	Added Volume	# of Lanes	Volume	Density	LOS	Added Volume	# of Lanes	Volume	Density	LOS
#1)	SR 17	Saratoga Ave to Lark Ave	NB	AM	13	2	4,213	50.2	E	–	–	–	–	–
				PM	2	2	3,172	24	C	–	–	–	–	–
#2)	SR 17	Lark Ave to SR 85	NB	AM	0	2	4,100	32	D	–	–	–	–	–
				PM	0	2	2,640	20	C	–	–	–	–	–
#3)	SR 17	SR 85 to San Tomas Exp-Camden Ave	NB	AM	0	3	4,760	24	C	–	–	–	–	–
				PM	0	3	3,770	19	C	–	–	–	–	–
#4)	SR 17	San Tomas Exp-Camden Ave to Hamilton Ave	NB	AM	5	3	6,245	52	E	–	–	–	–	–
				PM	32	3	3,632	18.1	C	–	–	–	–	–
#5)	SR 17	Hamilton Ave to San Tomas Exp-Camden Ave	SB	AM	32	3	4,522	22.8	C	–	–	–	–	–
				PM	6	3	6,866	35.2	D	–	–	–	–	–
#6)	SR 17	San Tomas Exp-Camden Ave to SR 85	SB	AM	3	3	3,773	19.1	C	–	–	–	–	–
				PM	16	3	4,966	25.1	C	–	–	–	–	–
#7)	SR 17	SR 85 to Lark Ave	SB	AM	3	2	2,513	19	C	–	–	–	–	–
				PM	**16**	**2**	**3,576**	**74.5**	**F**	–	–	–	–	–
#8)	SR 17	Lark Ave to Saratoga Ave	SB	AM	5	2	4,115	54.1	E	–	–	–	–	–
				PM	**29**	**2**	**3,679**	**73.6**	**F**	–	–	–	–	–

Notes: **Bold** indicates segment operating at LOS F conditions; – indicates no HOV lane provided on segment.
Source: W-Trans, 2018.

TABLE 4.13-18 EXISTING PLUS PROJECT FREEWAY LEVELS OF SERVICE (SR 17)

					Mixed-Flow Lane					HOV Lane				
#	Freeway	Segment	Dir	Peak Hour	Added Volume	# of Lanes	Volume	Density	LOS	Added Volume	# of Lanes	Volume	Density	LOS
#9)	SR 85	Union Ave to Bascom Ave	NB	AM	**3**	**2**	**3,103**	**91.3**	**F**	**2**	**1**	**1,402**	**100.1**	**F**
				PM	1	2	3,171	24	C	0	1	980	14	B
#10)	SR 85	Bascom Ave to SR 17	NB	AM	**0**	**2**	**2,280**	**114**	**F**	**0**	**1**	**1,160**	**116**	**F**
				PM	0	2	2,130	15.9	B	0	1	1,540	22	C
#11)	SR 85	SR 17 to Winchester Blvd	NB	AM	**0**	**2**	**2,340**	**117**	**F**	**0**	**1**	**1,100**	**122.2**	**F**
				PM	0	2	2,000	14.9	B	0	1	560	8	A
#12)	SR 85	Winchester Blvd to Saratoga Ave	NB	AM	**1**	**2**	**3,411**	**81.2**	**F**	**1**	**1**	**1,891**	**65.2**	**F**
				PM	11	2	4,041	31.1	D	2	1	702	10	A
#13)	SR 85	Saratoga Ave to Winchester Blvd	SB	AM	11	2	3,181	24.1	C	2	1	472	7	A
				PM	**2**	2	**4,062**	**58**	**F**	1	1	2,341	39	D
#14)	SR 85	Winchester Blvd to SR 17	SB	AM	0	2	1,600	11.9	B	0	1	670	10	A
				PM	**0**	**2**	**3,010**	**94.1**	**F**	0	1	2,300	46	E
#15)	SR 85	SR 17 to Bascom Ave	SB	AM	0	2	2,400	17.9	B	0	1	740	11	B
				PM	**0**	**2**	**2,200**	**122.2**	**F**	**0**	**1**	**1,760**	**88**	**F**
#16)	SR 85	Bascom Ave to Union Ave	SB	AM	1	2	2,911	22.1	C	0	1	470	7	A
				PM	**3**	**2**	**2,783**	**99.4**	**F**	**2**	**1**	**1,952**	**65.1**	**F**

Notes: **Bold** indicates segment operating at LOS F conditions; - indicates no HOV lane provided on segment.
Source: W-Trans, 2018.

Queuing at Freeway Ramps

An evaluation of the freeway ramp queues is not a requirement contained in the *VTA TIA Guidelines* but is provided for informational purposes only. A summary of queue lengths at select freeway ramps is provided in Table 4.13-19 for every scenario considered and queue estimating worksheets or SimTraffic Output reports are included in the technical appendix to this Draft EIR (Appendix I).

Vehicle storage at the selected ramp facilities is anticipated to be sufficient to accommodate the 95th percentile queues for every scenario considered; therefore, the project would have a *less-than-significant* impact at the freeway ramps.

Significance without Mitigation: Less than significant.

TABLE 4.13-19 COMPARISON OF QUEUE LENGTHS AT FREEWAY RAMPS

Location / Scenarios	Storage	95th Percentile Queue Length AM Peak	95th Percentile Queue Length PM Peak
SR 85 Northbound Diagonal On-Ramp from Winchester Boulevard			
Existing Condition	820	100	250
Existing + Approved Project Trips (Background) Condition		100	250
Existing + Project Condition		100	250
Background + Project Condition		100	250
Cumulative Condition		125	250
Cumulative + Project Condition		125	250
SR 85 Southbound Diagonal Off-Ramp to Winchester Boulevard			
Existing Condition	1,300	450	175
Existing + Approved Project Trips (Background) Condition		450	175
Existing + Project Condition		475	200
Background + Project Condition		450	175
Cumulative Condition		475	200
Cumulative + Project Condition		500	200
SR 17 Northbound Off-Ramp to White Oaks Road			
Existing Condition	940	372	189
Existing + Approved Project Trips (Background) Condition		387	176
Existing + Project Condition		365	193
Background + Project Condition		395	172
Cumulative Condition		481	435
Cumulative + Project Condition		477	475
SR 17 Southbound On-Ramp from San Tomas Expressway			
Existing Condition	1,000	250	125
Existing + Approved Project Trips (Background) Condition		250	150
Existing + Project Condition		250	125
Background + Project Condition		250	150
Cumulative Condition		250	175
Cumulative + Project Condition		250	175
SR 17 Southbound Off-Ramp to San Tomas Expressway			
Existing Condition	1,500	850	1,500
Existing + Approved Project Trips (Background) Condition		850	1,500

TABLE 4.13-19 COMPARISON OF QUEUE LENGTHS AT FREEWAY RAMPS

Location / Scenarios	Storage	95th Percentile Queue Length AM Peak	95th Percentile Queue Length PM Peak
Existing + Project Condition		925	1,500
Background + Project Condition		850	1,500
Cumulative Condition		925	1,500
Cumulative + Project Condition		925	1,500

Source: W-Trans, 2018.

Neighborhood Traffic Analysis

The average daily traffic (ADT) volumes on the study neighborhood street segments was determined based on 24-hour machine counts conducted across three days from September 12 through September 14, 2017 on the segments of Hacienda Avenue between Winchester Boulevard and Capri Drive and Capri Drive to Virginia Avenue. The volumes used for the analysis represent the average of the three-day count. Roadway segment counts are provided in the technical appendix to this Draft EIR (Appendix I).

It is estimated that one percent of the project-generated traffic would access the project via Hacienda Avenue. This represents 43 trips per day. The number of daily trips needed to change the TIRE index calculation by 0.1 (or greater) is much higher than the volume of project-generated traffic that is anticipated to use these roadways. Based on likely travel routes and the surrounding roadway network, it is unlikely that the project-related traffic would result in an imperceptible change in the volume of traffic on these streets. Table 4.13-20 summarizes the average daily traffic of the neighborhood streets, the TIRE index for the street segments under Existing Conditions, and the project-added trips.

The addition of project-related trips would not result in an increase to the TIRE index for Hacienda Avenue; therefore, the project would have a *less-than-significant* impact on these neighborhood street segments.

Significance without Mitigation: Less than significant.

TABLE 4.13-20 TIRE INDEX SUMMARY

Study Segment	Existing Conditions ADT	Existing Conditions TIRE Index	Volume Needed to Cause +0.1 Increase in TIRE Index	Daily Project Trips	Significant Impact
Hacienda Avenue - Winchester Blvd to Capri Dr	10,134	4.0	2,300	43	No
Hacienda Avenue - Capri Dr to Virginia Ave	8,767	3.9	1,800	43	No

Notes: ADT = Average Daily Traffic; Dates of Counts = September 12-14, 2017
Source: W-Trans, 2018.

Vehicle Miles Traveled Analysis

Senate Bill 743 recommends VMT as the sole measure of a project's impact on transportation infrastructure, as opposed to the current methods which focus on metrics related to vehicular roadway capacity and level of service. In November 2017, the California Governor's Office of Planning and Research (OPR) released a Technical Advisory on Evaluating Transportation Impacts in CEQA that contained recommendations regarding the assessment of VMT, proposed thresholds of significance, and potential mitigation measures for lead agencies to use while implementing the required changes contained in Senate Bill 743. The "Final Adopted Text for Revision to the CEQA Guidelines" became effective December 28, 2018 and included updated text for Section 15064.3, Determining the Significance of Transportation Impacts, of the CEQA Guidelines. This updated Section included updated language regarding the criteria for analyzing transportation impacts for land use projects and transportation projects and directs lead agencies to "choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure." OPR recommends that for most instances a per service population threshold should be adopted and that a fifteen percent reduction below that of existing development would be a reasonable threshold. Specifically, for office projects OPR proposes the following threshold "a proposed project exceeding a level of 15-percent below existing regional VMT per employee may indicate a significant transportation impact," where the regional VMT per employee represents the entire Bay Area as reported by the Metropolitan Transportation Commission. Conversely, where the region is substantially larger than the geography over which most workers would be expected to live, it might be appropriate to refer to a smaller geography, such as the county, that includes the area over which nearly all workers would be expected to live. The City of San José adopted OPR's proposed language as its significance threshold for "General Employment Uses" on February 27, 2018. Additionally, screening thresholds can be adopted for land use projects to identify projects that would be expected to result in a less-than-significant without conducting a detailed VMT study. Lead agencies may screen out VMT impacts using project size, map-based screening tools, and transit availability. The City of San José has adopted all three strategies.

The City of Campbell has not yet adopted updated CEQA significance criteria for transportation analysis, but intends to update the criteria prior to the July 1, 2020 statewide application deadline. However, in recognition of the emerging requirements under Senate Bill 743 to consider VMT as an alternative metric to LOS, the discussion below compares the existing and proposed VMT per employee to the regional average VMT per employee threshold as reported in the City of San José's Transportation Analysis Handbook, April 2018.

The City of San José adopted OPR's proposed language as its significance threshold for "General Employment Uses" on February 27, 2018. Additionally, screening thresholds can be adopted for land use projects to identify projects that would be expected to result in a less-than-significant without conducting a detailed VMT study. Lead agencies may screen out VMT impacts using project size, map-based screening tools, and transit availability. The City of San José has adopted all three strategies. The existing and proposed VMT per employee was calculated using the California Emissions Estimator Model (CalEEMod, version 2016.3.2). CalEEMod is a statewide land use emissions model used to quantify potential emissions impacts associated with a variety of land use projects. The model quantifies direct emissions, including vehicle use, and indirect emissions, including energy and water use. The model was developed for the

California Air Pollution Control Officers Associations and incorporates the air quality mitigation measures outlined in Quantifying Greenhouse Gas Mitigation Measures, CAPCOA 2010. Under Existing Conditions, based on the existing building footprints and overall building occupancy, it was estimated that the project site generates approximately 14.04 VMT per employee. The proposed project would be expected to generate approximately 13.72 VMT per employee, if it were to include a transportation demand management (TDM) program. However, a TDM program has not yet been developed for the project. The threshold of significance for general employment use development projects as determined by the City of San José is 12.21 VMT per employee. Only the implementation of a trip reduction program was modeled as a TDM strategy for both the existing and proposed scenarios. CalEEMod can quantify the trip reduction potential of other TDM strategies. Quantifying the VMT per employee for the proposed project helps to understand the larger impact to regional travel patterns; however, VMT is not the basis for a standard of significance used in this EIR. Therefore, no impact finding regarding VMT is made.

TRANS-2	**The proposed project 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.**

Of the 22 study intersections in this analysis, 10 are included in the Santa Clara County's CMP. Impact discussion TRANS-1, which presents the results of the impact analysis under the Existing plus Project, and Background plus Project conditions for all 22 study intersections, includes these CMP intersections. The proposed project would result in *significant* impacts to the CMP intersection of San Tomas Expressway/SR 17 Southbound Ramps (Intersection #6) during the AM peak hour.

Significance without Mitigation: Significant.

Impact TRANS-2: During the AM peak hour under Existing plus Project and Background plus Project conditions, the intersection of San Tomas Expressway/SR 17 Southbound Ramps (Intersection #6) would operate at an unacceptable LOS F with or without the addition of project-generated vehicle trips. The addition of project-generated trips would increase the volume-to-capacity ratios by more than 0.01 and increase the average control delay for critical movements by more than four seconds.

Mitigation Measure TRANS-2: The recommended mitigation measure would be to widen the westbound (off-ramp) approach at the intersection of the San Tomas Expressway/SR 17 southbound ramps (Intersection #6) to include a second right turn lane. Although recommended widening of the southbound off-ramp would improve traffic levels sufficient to reduce this impact to a less-than-significant level, implementation of the widening cannot be guaranteed as the off-ramp is a Caltrans facility and the intersection is County-operated. Furthermore, the recommended improvement is not part of VTA's Measure B regional improvements list.

Significance with Mitigation: Significant and unavoidable.

TRANS-3	The proposed project 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 project would have no effect on air traffic patterns leading to a safety risk as the proposed project would not include any buildings taller than typical building heights in the project area or other hazards that would affect the operation of air traffic patterns. Therefore, the project would have *no impact*.

Significance without Mitigation: No impact.

TRANS-4	The proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersection) or incompatible uses (e.g., farm equipment).

The project would not alter the existing location of the driveways on Dell Avenue or the existing Los Gatos Creek Trail access pathway on the adjacent to the northern edge of the site. There are two full access driveways located 340 feet apart. The south driveway is located within 50 feet of two other driveways serving adjacent properties (one on the west side of Dell Avenue and another just south of the project site on Knowles Avenue) as well as the 90-degree curve between Dell Avenue and Knowles Drive.

Sight Distance at Driveways

At driveways, a substantially clear line of sight should be maintained between the driver of a vehicle waiting at the crossroad and the driver of a approaching vehicle on Dell Avenue. Adequate time must be provided for the waiting vehicle to either cross, turn left, or turn right, without requiring the through traffic to radically alter their speed. Sight distance along Dell Avenue at the project driveways was evaluated based on sight distance criteria contained in the *Highway Design Manual* published by Caltrans. The recommended sight distances for driveways are based on stopping sight distance, which uses the approach travel speeds as the basis for determining the recommended sight distance. Based on the posted speed limits near the project of 30 mph on Knowles Drive and Dell Avenue, the minimum stopping sight distance needed is 200 feet.

Sight distances at the proposed driveways were field measured, taking into consideration existing and proposed trees and vegetation along Dell Avenue. The available sight distance at each driveway along Dell Avenue would exceed 200 feet in every direction.

Sight distances along Dell Avenue at the project driveways would be adequate for the approach speeds. Therefore, the project would have a *less-than-significant* impact in regards to sight distances at each driveway access.

Significance without Mitigation: Less than significant.

Driveway Separation

The southernmost project driveway is located within 35 feet of an existing driveway serving the neighboring land use on Knowles Avenue. Although it is desirable to provide greater separation between driveways, the proposed close spacing between these two driveways is acceptable based on the availability of unobstructed sight lines between vehicles at each driveway, combined with the expected slow operating speeds of vehicles.

The project is proposing to improve the pedestrian and bicycle access by providing a new sidewalk along the project frontage of Dell Avenue. The proposed sidewalk on Dell Avenue would connect the trail access pathway along the northern site boundary to the existing sidewalk at Knowles Drive, providing continuous pedestrian access to both the northern and southern project boundaries. Potential conflicts between pedestrians or bicyclists using the trail and vehicles accessing either driveway is not anticipated due to the relatively slow vehicle travel speeds and favorable sight distances near the trail entrance.

Ingress and egress would be provided via two full access driveways on Dell Avenue. Although the southernmost driveway would be closely spaced with another driveway on Knowles Avenue, the line of sight between driveways is clear of obstructions and is considered acceptable. Therefore, the project would have a *less-than-significant* impact in regards to driveway spacing along Dell Avenue.

Significance without Mitigation: Less than significant.

Site Circulation, Safety, and Access

On-site circulation was evaluated to determine if the layout would provide adequate circulation and room for interaction between pedestrians walking and vehicles maneuvering through the parking lot. Based on a review of the site plan, the internal roadways are expected to provide acceptable circulation for motorized vehicles and clearly marked paths for pedestrians between the building entrances, the parking structure and sidewalks along Dell Avenue.

The site plan included an exhibit showing access for a standard fire truck. The exhibit demonstrates that a fire truck has sufficient (minimum outside turning radius of 42 feet) space to enter from Dell Avenue, maneuver within the at-grade parking lot and exit onto Dell Avenue without striking permanent fixtures on the project site.

Vehicle access to all areas of the site would be adequate. Sidewalks to be provided between the project building and Dell Avenue would result in adequate access for pedestrians. Therefore, the project would have a *less-than-significant* impact in regards to site circulation, safety and access within the site.

Significance without Mitigation: Less than significant.

Off-Street Parking

The proposed project off-street parking supply was analyzed to determine whether it would be sufficient for the anticipated parking demand. The project would include 736 parking stalls, with 513 spaces within

the multi-level parking structure and the remaining 223 spaces located in the surface parking lot. These spaces are not anticipated to be shared with adjacent land uses. Neither the public open space or the adjacency to the trail is expected to produce any additional demand for parking, as discussed earlier in this chapter. The parking demand was estimated using two separate resources to determine a reasonable number of parking spaces for an office land use; the City Municipal Code and published ITE rates. The estimated parking requirements were determined by calculating the demand using both sources and choosing the more conservative result.

Parking supply requirements are in the City of Campbell Municipal Code, Chapter 21.28; Parking and Loading for "Professional Offices." The City requirement states that one space is required per 225 square feet of gross floor area.

Parking demand for the proposed project was estimated using standard rates published by ITE in *Parking Generation*, 4th Edition, 2010. The parking demand of the project was estimated using the published 85th-percentile rates for Office Building (ITE LU 701) in a suburban setting.

The City requirement of 719 spaces is higher than the calculated ITE demand of 559 spaces. The project is proposing to provide 736 spaces which is greater than either the City requirement or the ITE calculated demand. The proposed parking supply, expected demand, and City requirements are summarized in Table 4.13-21.

TABLE 4.13-21 PARKING ANALYSIS SUMMARY

			ITE Parking Generation		City Requirements	
Land Use	Units (ksf)	Supply (Spaces)	Rate[a]	Estimated Parking Demand	Rate[b]	Spaces Required
Office Building	161.87	736	3.45	559	1 space for each 225 sf of gross floor area	719

Notes: sf = square feet; ksf = 1,000 square feet
a. Parking Generation 4th Edition, Institute of Transportation Engineers, 2010.
b. Chapter 21.28.040 Number of Parking Spaces Required, *Campbell Municipal Code,* Municipal Code Corporation, 2017.
Source: W-Trans, 2018.

The City of Campbell Municipal Code requires that parking spaces for the disabled be provided in compliance with the California Building Code and the ADA requirements. The requirements stipulated by the Federal Accessibility Guidelines state that two-percent of the total number of stalls must be categorized as accessible stalls for disabled persons. To satisfy this requirement, at least 15 stalls for disabled persons must be provided. The site plan shows that out of the 736 spaces available at the proposed project, there are 18 stalls designated for this type of use (7 surface level stalls and 11 parking garage stalls). Thus, the project complies with these Federal Accessibility Guidelines.

In summary, the project would provide an adequate number of parking spaces to accommodate the anticipated demand per ITE rates and City requirements. The number of stalls for disabled persons satisfies applicable requirements. Therefore, the project would have a *less-than-significant* impact in regards to potential design issues and hazards associated with off-street parking at the project site.

Significance without Mitigation: Less than significant.

TRANS-5 The proposed project would not result in inadequate emergency access.

The proposed project would not alter the capacity or physical characteristics of the roadways serving Dell Avenue and the surrounding area. Although there would be an increase in project-generated trips into the immediate areas, those vehicles would most frequently be parked within the off-street parking lots and would not be blocking the roadway travel lanes. Emergency vehicle response times are not expected to have any measurable change with the addition of project-generated trips and thus would not be significantly impacted by the project. Therefore, the project would not have a substantial effect on emergency access to the areas in the vicinity of the project site, and this impact would be *less than significant*.

Significance without Mitigation: Less than significant.

TRANS-6 The proposed project 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.

Pedestrian Facilities

Given the proximity of residences (the San Tomas residential community is approximately 2,000 feet west of the project) and commercial land uses surrounding the site, it is reasonable to assume that some office patrons, visitors, and employees would want to walk, bicycle, and/or use transit to reach the project site.

The project would include a sidewalk on Dell Avenue along the entire frontage adjacent to the project, providing continuous pedestrian access between the pathway along the northern property side boundary to Los Gatos Creek Trail and the sidewalk on Knowles Drive. Pedestrian facilities serving the project site are expected to be adequate; therefore, the project would have a *less-than-significant* impact on pedestrian facilities within the study area.

Significance without Mitigation: Less than significant.

Bicycle Facilities

Existing bicycle facilities, including the Los Gatos Creek Trail and bike facilities on Winchester Boulevard and Knowles Drive, together with shared use of minor streets, provide adequate access for bicyclists. The project accommodates parking for 37 bicycles, including two (2) short-term visitor stalls in front of the building and 35 bicycle stalls within the parking structure. Bicycle facilities serving the project sites are expected to be adequate; therefore, the project would have a *less-than-significant* impact on the bicycle facilities within the study area.

Significance without Mitigation: Less than significant.

Transit

Existing transit routes are adequate to accommodate potential project-generated transit trips based on the number of routes and frequency of service. Existing bus stops located on either Knowles Drive or Winchester Boulevard are within acceptable walking distance of the site. As described under Section 4.13-1, VTA is currently planning to extend light rail service along the Winchester Boulevard corridor, with two new stations planned near the project area. Transit users to access the project site may also choose alternate transportation options to access the site from transit stops, such as bicycling or using a ride hailing company (e.g., Uber, Lyft).

Because existing transit facilities are adequate to accommodate project-generated transit trips, the project would have a *less-than-significant* impact on the transit services within the study area.

Significance without Mitigation: Less than significant.

4.13.3 CUMULATIVE IMPACTS

The traffic study considered both project-specific impacts and the project's cumulative contribution to traffic in project vicinity. The traffic forecasts are based on a regional transportation demand model and incorporate regional growth projections. Cumulative traffic impacts are addressed above under impact discussion TRANS-1 under the Cumulative plus Project conditions, which accounts for traffic generation both by regional (ambient) growth and by related projects. Significant cumulative traffic impacts were identified at the intersection of San Tomas Expressway/SR 17 Southbound Ramps (Intersection #6), however with implementation of Mitigation Measure TRANS-1a, impacts would be less than significant.

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4.14 UTILITIES AND SERVICE SYSTEMS

This chapter describes the regulatory framework and existing conditions on the project site related to utilities and service systems, and the potential impacts of the project on water, sanitary, solid waste, and energy services.

4.14.1 WATER

4.14.1.1 ENVIRONMENTAL SETTING

This section describes the existing regulatory setting and conditions as well as potential impacts of the proposed project with regard to water supply. Water service in the City of Campbell is provided by San Jose Water Company (SJWC).

Regulatory Setting

Federal Regulations

The Safe Drinking Water Act, the principal federal law intended to ensure safe drinking water to the public, was enacted in 1974 and has been amended several times since it came into law. The Safe Drinking Water Act authorizes the United States 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 man-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 last amended in January 2018, the State Water Resources Control Board (State Water Board) 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. The City of Campbell is under the jurisdiction of the San Francisco Bay Region (Region 2) RWQCB.

California Urban Water Management Planning 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 Urban Water Management Plan (UWMP)

and update it every five years. This requirement applies to all suppliers providing water to more than 3,000 customers or supplying more than 3,000 acre-feet per year (AFY)[1] of water. One of the purposes of the UWMPs is to identify measures to meet Senate Bill (SB) X7-7 requirements that mandate a 20 percent reduction of per capita water use and agricultural water use throughout the state by 2020. These UWMPs evaluate the water supply capacity and the projected water demands of the service area over a 20- or 25-year planning horizon.

The Urban Water Management Planning Act is intended to support conservation and efficient use of urban water supplies. The Act requires that total project water use be compared to water supply sources over the next 20 years in five-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. In September 2014 the Act was amended by SB 1420 to require urban water suppliers to provide descriptions of their water demand management measures and similar information.

The Water Conservation Act of 2009

The Water Conservation Act of 2009,[2] SB X7-7, requires all water suppliers to increase water use efficiency. The legislation sets an overall goal of reducing per capita water by 20 percent by 2020, with an interim goal of a 10 percent reduction in per capita water use by 2015. Effective in 2016, urban retail water suppliers who do not meet the water conservation requirements established by this bill are not eligible for State water grants or loans. SB X7-7 requires that urban water retail suppliers determine baseline water use and set reduction targets according to specified standards.

State Model Landscape Ordinance

The California Water Conservation in Landscaping Act, also known as the State Landscape Model Ordinance, was amended pursuant to Assembly Bill (AB) 2717 and AB 1881. AB 1881 required cities and counties to adopt landscape water conservation ordinances by January 31, 2010, or to adopt a different ordinance that was at least as effective in conserving water as the California Updated Model Water Efficient Landscape Ordinance that went into effect in October 2009.

The updated Model Landscape Ordinance requires cities and counties to adopt landscape water conservation ordinances by February 1, 2016 or to adopt a different ordinance that is at least as effective in conserving water as the updated Model Ordinance.

California Green Building Standards Code

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) to apply to the planning, design, operation, construction, use, and occupancy of every newly constructed

[1] 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.

[2] California Department of Water Resources, Senate Bill SBX7-7 2009 Information, http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200920107SB7, accessed August 27, 2018.

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 measures and requirements that new buildings reduce water consumption by 20 percent. The building efficiency standards are enforced through the local building permit process.

California Senate Bill 610

SB 610 amended State law to ensure better coordination between local water supply and land use decisions and ensure adequate water supply for new development. The statute requires that detailed information regarding water availability be provided to city and county decision-makers prior to approval of large development projects. SB 610 requires water supply assessments (WSAs) for certain types of projects, as defined by Water Code Section 10912, which are subject to the California Environmental Quality Act (CEQA).

SB 610 requires the WSA to describe the proposed project's water demand over a 20-year period, identify the sources of water available to meet the demand, and include an assessment of whether those water supplies are, or will be, sufficient to meet the demand for water associated with the proposed project in addition to the demand of existing customers and other planned future development. The available water supply must be based on three water supply scenarios: normal year, single dry year, and multiple dry years. If the WSA concludes that water supplies are or will be insufficient, then the WSA must describe plans (if any) for acquiring additional water supplies and the measures that are being undertaken to acquire and develop those supplies.

Local Regulations

Santa Clara Valley Water District 2015 Urban Water Management Plan[3]

The 2015 UWMP was adopted by the Santa Clara Valley Water District (SCVWD) in June 2016 in accordance with the SB X7-7 and the Urban Water Management Planning Act. A range of water supply scenarios were modeled, including 1) normal, 2) single dry, and 3) multiple dry water year conditions. The 2015 UWMP describes the SCVWD's:

- Water service area.
- Existing and planned sources of water.
- Water supply reliability.
- Current and projected water use.
- Water demand management measures (e.g., conservation programs) in place or scheduled for implementation.
- Anticipated effectiveness of each water demand management measure.

The SJWC is one of thirteen water retailers under the jurisdiction of SCVWD.

[3] Santa Clara Water District, 2015 Urban Water Management Plan, https://www.valleywater.org/sites/default/files/SCVWD%202015%20UWMP-Report%20Only.pdf, accessed August 27, 2018.

City of Campbell Municipal Code[4]

Chapter 8.34 of the City of Campbell's Municipal Code relates to potable water use restrictions. The purpose of this chapter is to wisely manage water resources, practice voluntary efficient water use, avoid water waste, and to preserve the health and safety of the people of Campbell. The code details permanent water use restrictions in addition to provisions that apply when the City Council adopts a resolution declaring the existence of a drought.

Chapter 21.26 specifies landscaping requirements and includes provisions for the conservation of water resources through the efficient use of irrigation, appropriate plant materials, and regular maintenance of landscaped areas. Water Efficient Landscape Guidelines, consistent with Chapter 21.26, were adopted by the City on December 1st, 2015.[5]

Existing Conditions

Water service for the project site is provided by the SJWC. The SJWC provides customer service to nearly one million residents of Santa Clara County. The SJWC operates approximately one hundred groundwater production wells and receives water supplies from the SCVWD, and local surface water from the Santa Cruz Mountains.

The SJWC's service area encompasses about 139 square miles, including most of San José; most of Cupertino; the entire cities of Campbell, Monte Sereno, and Saratoga; the Town of Los Gatos; and parts of unincorporated Santa Clara County.[6]

Recycled water is currently about five percent (or about 20,000 AFY) of the county's supply and is distributed for non-potable uses such as landscape and agricultural irrigation, industrial cooling, and dual-plumbed facilities. This recycled water is produced at the four wastewater plants in the county–Palo Alto, Sunnyvale, San José/Santa Clara, and South County Regional Wastewater Authority.[7] South Bay Water Recycling is a recycled water wholesaler to the SJWC.

The domestic water service for the proposed project is provided by a 12-inch water main along Dell Avenue.

[4] City of Campbell Municipal Code, 2018, https://library.municode.com/ca/campbell/codes/code_of_ordinances?nodeId=CAMUCO1971, accessed August 27, 2018.

[5] City of Campbell Water Efficient Landscape Guidelines, 2015, https://www.ci.campbell.ca.us/DocumentCenter/View/176/WELS-Guidelines?bidId=, accessed August 27, 2018.

[6] San Jose Water Company, 2011, 2010 Urban Water Management Plan, https://water.ca.gov/LegacyFiles/urbanwatermanagement/2010uwmps/San%20Jose%20Water%20Company/SJWC'S%202010%20UWMP%20with%20Appendicies.pdf, accessed August 27, 2018

[7] Santa Clara Water District, 2015 Urban Water Management Plan, https://www.valleywater.org/sites/default/files/SCVWD%202015%20UWMP-Report%20Only.pdf, accessed August 27, 2018.

4.14.1.2 IMPACT DISCUSSION

Standards of Significance

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in the Impact Analysis below uses the following standards of significance. The proposed project would have a significant impact on water service if:

- There were insufficient water supplies available to serve the project from existing entitlements and resources, or if new or expanded entitlements were needed.
- 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.

Impact Analysis

The following impact discussion analyzes the project's impact using the standards of significance as identified in the Standards of Significance section above. This section analyzes the proposed project's potential impacts to water supply and distribution facilities.

UTIL-1	**The proposed project would have sufficient water supplies available from existing entitlements, conservation plans and resources, and would not require new or expanded entitlements.**

The proposed project would involve the construction of a 161,870-square-foot four-story office building, a 146,478-square-foot five-story parking garage, additional surface parking, and 46,968 square feet of landscaping area. Using the California Emission Estimator Model (CalEEMod) water use rates for indoor water use, operation of the proposed project is estimated to generate an indoor water demand rate of 0.49 gallons per square feet per day.[8] The outdoor water demand is calculating by using the California Department of Water Resources' Water Budget Workbook.[9] In total, the proposed development would require 81,138 gallons per day (GPD) or 91 AFY (see Table 4.14-1). The existing project consists of a

[8] California Emission Estimator Model, 2017, Appendix D, Default Data Tables. http://www.aqmd.gov/docs/default-source/caleemod/upgrades/2016.3/05_appendix-d2016-3-1.pdf, accessed on August 27, 2018.

[9] California Department of Water Resources, 2015, Water Budget Workbook for Compliance with MWELO and CalGreen, Part 11, Title 24, https://water.ca.gov/LegacyFiles/wateruseefficiency/docs/2015/BSCWaterBudget105.xls, accessed March 20, 2019.

71,620-square-foot office building, a surface parking lot, and 44,781 square feet of landscaping area.[10] Furthermore, the existing building is at 32 percent occupancy. The total water demand for existing conditions is 12,967 GPD. The net increase in water demand due to project development is 66,171 GPD or 76 AFY (see Table 4.14-1).

The SCVWD's UWMP estimates future water demands accounting for implementation of passive and active water conservation measures and an increase in recycled water supply. Water supplies for the SJWC are planned to be supplemented by an increasing amount of recycled water from South Bay Water Recycling. In 2040, it is projected that 8,400 AFY of recycled water would be available to the SJWC.[11]

TABLE 4.14-1 PROJECTED WATER DEMAND

Proposed Land Use	Buildout (SF)	Indoor Water Demand Rate[b] (Gallons per SF per Day)	Indoor Water Demand (GPD)	Outdoor Water Demand Rate (Gallons per SF per Day)	Outdoor Water Demand (GPD)[c]
Proposed Project					
Office Building[a]	161,870	0.49	79,316	-	-
Landscape Area	46,968	-	-		1,822
Total			**79,316**		**1,822**
Existing Conditions					
Office Building[a]	22,918	0.49	11,230		
Landscape Area	44,781	-	-		1,737
Total			**11,230**		**1,737**
Net Increase			**68,086**		**85**

Notes: GPD = gallons per day; SF = square foot
a. Water use rate for General Office Building used.
b. Source: California Air Pollution Control Officers Association, 2017, California Emissions Estimator Model Version 2016.3.2 User's Guide, Appendix D.
b. Water use rate for General Office Building used.
c. Source: California Department of Water Resources, 2015, Water Budget Workbook for Compliance with MWELO and CalGreen, Part 11, Title 24.
Source: PlaceWorks, March 26, 2019.

Water demands were estimated up to the year 2040 for normal, single dry, and multiple dry years. The proposed project's water demand is within the amount of growth projected under the City's General Plan. For normal years, the SCVWD would meet its water demands up until 2040. Supplies, with the use of reserves, appear to be sufficient to meet demands during a single dry year through 2035. Under 2040 demand conditions, reserves would be insufficient at the beginning of the year to meet demands without overdrawing the groundwater reserves. The SCVWD would likely call for a 5 to 10 percent reduction in water use in such a year, consistent with its Water Shortage Contingency Plan. For multiple dry years, demands would exceed supplies beginning in the second year of drought for the 2020 scenario and up to 2040. During multiple dry years, the City expects to meet its shortfall through the implementation of its

[10] Chang Architecture, 2017, Existing Survey Sheet S-1.

[11] Santa Clara Water District, 2016, 2015 Urban Water Management Plan, https://www.valleywater.org/sites/default/files/SCVWD%202015%20UWMP-Report%20Only.pdf, accessed August 27, 2018.

Water Shortage Contingency Plan. The project would be required to comply with CALGreen and the City of Campbell's Municipal Code requirements to minimize water usage. In single or multiple dry years, the project would comply with the SCVWD's Water Shortage Contingency Plan.

Mandatory compliance with these regulations would ensure that project's water demand of 144 AFY would not exceed the available water supply or require new or expanded entitlements. Accordingly, implementation of the proposed project would result in a *less-than-significant* impact.

Significance without Mitigation: Less than significant.

UTIL-2	**The proposed project 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.**

The City of Campbell does not own or operate any water treatment facilities, because the water supplied from the SJWC has already been treated. As noted under impact discussion UTIL-1, the proposed project would have sufficient potable water supplies available from existing entitlements and through its water shortage contingency planning would not require the expansion or construction of additional SJWC water treatment facilities.

To ensure that both existing and future water system infrastructure needs are met, the SCVWD prepared a Water System Master Plan that includes recommendations to ensure the long-term viability of the system in light of any anticipated capacity changes. The plan is updated every five years to recognize improvements completed and plan for any needed new upgrades in the water system.[12]

The proposed project includes the construction of water connections on-site to the 12-inch water main along Dell Avenue. The construction-related impacts associated with these improvements are analyzed throughout this Draft Environmental Impact Report. This analysis focuses on whether the City would need to expand its water supply system in order to handle the demand generated by the project.

The project would not result in the construction of new water treatment or distribution facilities by the City and the impact would be *less than significant*.

Significance without Mitigation: Less than significant.

[12] Santa Clara Valley Water District, 2017, Water Management Plan, https://www.valleywater.org/sites/default/files/2017%20Water%20Management%20Plan%20SCVWD%20Final.pdf, accessed August 27, 2018.

4.14.1.3 CUMULATIVE IMPACTS

UTIL-3	**The proposed project, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to water service.**

The area considered for cumulative water supply impacts is the service area for the SCVWD. Other future projects in the service area would result in increases in water demand. The SCVWD forecasts that it will have sufficient water supplies in its service area through 2040 for a normal water year, and will need to implement its Water Shortage Contingency Plan for single dry and multiple dry years (see impact discussion UTIL-1). Larger projects that meet the SB 610 criteria would be required to prepare WSAs. The SCVWD would review all such proposed projects for the adequacy of water supply and would periodically update the UWMP to ensure that there are adequate water supplies and contingency plans for future residents and customers. Therefore, cumulative impacts would be *less than significant* with respect to water service.

Significance without Mitigation: Less than significant.

4.14.2 SANITARY WASTEWATER (SEWER)

This section describes the existing regulatory setting and conditions as well as potential impacts of the proposed project with regard to wastewater collection and treatment facilities. The sanitary sewer system in the City of Campbell is operated by the West Valley Sanitation District (WVSD). Wastewater is conveyed to the San Jose-Santa Clara Regional Wastewater Facility for treatment and final disposal.

4.14.2.1 ENVIRONMENTAL SETTING

Regulatory Setting

Federal Regulations

Clean Water Act

The Federal Water Pollution Act of 1972, more commonly known as the Clean Water Act (CWA), regulates the discharge of pollutants into watersheds throughout the nation. It is the primary federal law governing water pollution. Under the CWA, the EPA implements pollution control programs and sets wastewater standards. The objective of the CWA is to restore and maintain the chemical, physical, and biological integrity of the nation's waters by preventing point and nonpoint pollution sources, providing assistance to publicly owned treatment works for the improvement of wastewater treatment, and maintaining the integrity of wetlands.

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 connections and/or mass emissions of pollutants contained in the discharge; prohibitions on discharges not specifically allowed under the permit; and 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.

Operation of the San José-Santa Clara Regional Wastewater Facility (RWF) and its wastewater collection system is regulated by Waste Discharge Requirements (WDRs; NPDES No. CA0037842) found in San Francisco Bay RWQCB Order No. R2-2014-0034 effective November 1, 2014, and expiring February 1, 2019. The effluent from the San José-Santa Clara RWF is also subject to two other NPDES permits: 1) the WDRs for mercury and polychlorinated biphenyls (PCBs) from municipal and industrial wastewater discharges to San Francisco Bay (NPDES Permit No. CA0038849); and 2) waste discharge requirements for nutrients from municipal wastewater discharges to San Francisco Bay (NPDES Permit No. CA0038873). The three NPDES permits enable the San José-Santa Clara RWF to discharge treated wastewater into San Francisco Bay.

State Regulations

State Water Resources Control Board

On May 2, 2006 the State Water Board adopted a General WDR (Order No. 2006-0003) for all publicly owned sanitary sewer collection systems in California with more than one 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 Sanitary Sewer Master Plan. The General WDR also requires that storm sewer overflows be reported to the State Water Board using an online reporting system.

The San Francisco Bay RWQCB issues and enforces NPDES permits applicable to the San José-Santa Clara RWF in the City of San José.

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. 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.

Local Regulations

City of Campbell Municipal Code

Chapter 14.04 of the City of Campbell's Municipal Code establishes standards, conditions, and requirements related to the use of the City's sanitary sewer facilities. The Chapter establishes prohibited discharges into the sanitary sewer facilities. The Chapter also establishes fees for use and for the development of capital facilities related to wastewater.

West Valley Sanitation District Ordinance Code

The purpose of Chapter 7 of the WVSD's Ordinance Code is to regulate the disposal of sanitary sewage into the WVSD's sanitary sewer system. The code prevents the introduction of pollutants into the sanitary sewer system which will pass through the treatment works of the San José-Santa Clara RWF. This includes fats, grease, and oil from food service establishments. Additionally, Chapter 9 details permit requirements related to the construction of any private sewer intended to be connected to the WVSD's sanitary sewer system. Chapter 10 details the fees associated with connecting to the WVSD's sanitary sewer system.

San José/Santa Clara Water Pollution Control Plant Master Plan[13]

The Plant Master Plan involved a three year planning process to evaluate the San José/ Santa Clara Water Pollution Control Plant, the largest advanced wastewater treatment plant on the west coast. The process utilized principles of sustainability to develop a central planning document to guide improvements at the plant for the next 30 years (through the year 2040). The Plant Master Plan provides both a roadmap to help determine the projects and funding needed to repair and replace the plant's aging facilities and processes as well as a land use plan that defines the future treatment needs along with zoning designations and guidelines for the future development, restoration, and use of the plant's 4.5-square-mile site.

Existing Conditions

The WVSD maintains the wastewater collection system that services the project site. WVSD provides wastewater collection and disposal services for the communities of Campbell, Monte Sereno, and Los Gatos; much of Saratoga; and some unincorporated areas of the county within the WVSD boundary. The WVSD's service area is 18,112 acres (28.3 square miles). The pipeline collection system maintained and operated by the WVSD consists of 415 miles of main and trunk sewers and 210 miles of sewer laterals, for a total of 625 miles of sewer lines. Wastewater from the City of Campbell, including the project site, is conveyed to the San José-Santa Clara RWF.[14]

The San José-Santa Clara RWF treats an average of 110 million gallons per day (MGD) of wastewater, with a capacity of up to 167 MGD. The San José-Santa Clara RWF serves 1.4 million residents and over 17,000 businesses in eight towns/cities and four sanitation districts:

[13] San Jose/Santa Clara Water Pollution Control Plant, 2013, The Plant Master Plan, https://www.sanjoseca.gov/DocumentCenter/View/38425, accessed August 6, 2018.

[14] West Valley Sanitation District, About Us, http://www.westvalleysan.org/aboutus, accessed August 27, 2018.

- Cities of San José, Santa Clara, and Milpitas.
- Cupertino Sanitary District (Cupertino) and WVSD (Campbell, Los Gatos, Monte Sereno, and Saratoga).
- County Sanitation Districts 2-3 and Burbank Sanitary District (both unincorporated).[15]

Sewage generated by the City of Campbell accounts for 3 percent of the total wastewater treated at the RWF.[16]

4.14.2.2 IMPACT DISCUSSION

Standards of Significance

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in the Impact Analysis below uses the following standards of significance. The proposed project would have a significant impact on wastewater service if it would:

- Exceed wastewater treatment requirements of the applicable RWQCB.
- 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.
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

Impact Analysis

The following impact discussion analyzes the project's impact using the standards of significance as identified in the Standards of Significance above. This section analyzes the proposed project's potential impacts to wastewater collection and treatment facilities.

[15] City of San Jose. San José-Santa Clara Regional Wastewater Facility, http://www.sanjoseca.gov/index.aspx?NID=1663, accessed August 27, 2018.

[16] San Jose/Santa Clara Water Pollution Control Plan2013, The Plant Master Plan. http://www.sanjoseculture.org/DocumentCenter/View/38425, accessed August 27, 2018.

UTIL-4	The proposed project would not exceed wastewater treatment requirements of the San Francisco Bay Regional Water Quality Control Board.

Wastewater generated by the proposed project would be collected by the West Valley Sanitary District (WVSD) sanitary sewer system. Any wastewater discharged into the sanitary sewer system would need to abide by the regulations of the WVSD Ordinance Code. Project wastewater would be directed to the San José-Santa Clara Regional Wastewater Facility (RWF) for treatment. The RWF plant provides wastewater treatment services for the City of Campbell and other cities and agencies in Santa Clara County. Discharged wastewater would be required to comply with existing wastewater treatment regulations of the San Francisco Bay Regional Water Quality Control Board (RWQCB). In addition, water conservation policies adopted by the City would minimize the amount of wastewater generated. Compliance with these regulations would ensure that the proposed project would not exceed the RWQCB wastewater treatment requirements. Accordingly, implementation of the proposed project would result in a *less-than-significant* impact.

Significance without Mitigation: Less than significant.

UTIL-5	The proposed project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.

The San José-Santa Clara RWF treats an average of 110 MGD of wastewater, with a capacity of up to 167 MGD and a residual capacity of 57 MGD.[17] Flows are expected to increase in the future as new homes are built to house the 400,000 new residents projected in San José over the next 30 years. The projected extreme wet weather flow for the year 2040 is expected to be 450 MGD. While this scenario would not be a frequent occurrence, the RWF must be prepared to move this amount of wastewater to avoid untreated wastewater spills in neighborhood streets. The Plant Master Plan uses the 450 MGD maximum flow rate to establish the wet-weather hydraulic capacity for the RWF and to establish capital improvement projects over the next 30 years.[18]

For the purpose of this analysis, the project's wastewater generation is considered to be 100 percent of indoor water demand. Based on this assumption, the total net increase in wastewater generation for the project is 68,086 GPD[19] (see Table 4.14-1 for indoor water use calculation).

The proposed project's wastewater generation is within the amount of growth projected under the Plant Master Plan. With the proposed capital improvements, as described in the Plant Master Plan Project

[17] City of San Jose, 2016, San José-Santa Clara Regional Wastewater Facility, https://www.sanjoseca.gov/DocumentCenter/View/34681, accessed August 7,2018.

[18] San Jose/Santa Clara Water Pollution Control Plan, 2013, The Plant Master Plan, http://www.sanjoseculture.org/DocumentCenter/View/38425, accessed August 7, 2018.

[19] gallons per day

Memo 6.1,[20] the RWF would be able to cater for projected growth even in extreme wet weather. Key CIP elements include:

- Infrastructure rehabilitation at all stages of the treatment process for greater efficiency and reliability.
- New, more efficient biosolids (sludge) dewatering and drying processes to better control odors and reduce the operational footprint.
- New methods of generating energy to sustainably power Facility operations.[21]

Therefore, the RWF would have adequate capacity to accept wastewater produced by the proposed project. In addition, water conservation policies adopted by the City would minimize the amount of wastewater generated. Compliance with these regulations would ensure that the proposed project would not exceed the design or permitted capacity of the RWF that serves the project site.

The proposed project includes the construction of a sewer connection to the 8-inch sewer main along Dell Avenue. The construction-related impacts associated with these improvements are analyzed throughout this Draft Environmental Impact Report. This analysis focuses on whether the City would need to expand its wastewater facilities in order to handle the demand generated by the project.

Implementation of the proposed project would result in a *less-than-significant* impact.

Significance without Mitigation: Less than significant.

UTIL-6	**The proposed project would not result in the determination by the wastewater treatment provider, which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.**

As described under impact discussion UTIL-5, the San José-Santa Clara RWF has the available capacity to treat the 79,316 GPD of effluent anticipated to be produced by the proposed project. The project would also be required to comply with existing wastewater treatment requirements of the San Francisco RWQCB and State and local water conservation policies. Water conservation policies are mandated by the CalGreen building code, the SCVWD's Urban Water Management Plan (UWMP), and the City of Campbell's Municipal Code Chapter 21.26 *Landscape Requirements*.

Compliance with these regulations would minimize the amount of wastewater generated and ensure that the proposed project would not exceed the design or permitted capacity of the San José-Santa Clara RWF and would not require new or expanded water treatment facilities. Accordingly, implementation of the proposed project would result in a *less-than-significant* impact.

Significance without Mitigation: Less than significant.

[20] City of San Jose, San José/Santa Clara Water Pollution Control Plant Master Plan, Task No. 6 Project Memorandum No. 1 CIP Implementation, 2011, http://sanjoseca.gov/ArchiveCenter/ViewFile/Item/1564, accessed September 10, 2018.

[21] City of San Jose, Capital Improvement Program, http://www.sanjoseca.gov/index.aspx?nid=1665, accessed September 10, 2018.

4.14.2.3 CUMULATIVE IMPACTS

UTIL-7	**The proposed project, in combination with past, present, and reasonably foreseeable projects would result in less than significant cumulative impacts with respect to wastewater service.**

The area considered for cumulative impacts is the San José-Santa Clara RWF. Other projects in the service area would increase population and employment, thus increasing wastewater generation. Despite a steady increase in population served by the RWF as of 2013, influent wastewater flows to the plant had decreased over the previous 15 years due to the loss of industry and increased water conservation. This same trend is common throughout the Bay area. However, flows are expected to increase in the future as new homes are built to house the 400,000 new residents in San José over the next 30 years (since water conservation measures will have already been fully implemented). The projected extreme wet weather wastewater generation is forecast to increase to 450 mgd by 2040.[22] With the implementation of projected capital improvement projects, there is sufficient wastewater treatment capacity in the region for the cumulative increase in wastewater generation and the project will not cumulatively increase demands above those projected for the RWF. Therefore, cumulative impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

4.14.3 SOLID WASTE

4.14.3.1 ENVIRONMENTAL SETTING

This section describes the existing regulatory setting and conditions as well as potential impacts of the proposed project with regard to solid waste collection and treatment facilities. West Valley Collection and Recycling (WVC&R) provides residential (single family and multi-family) and commercial garbage, recycling, and green waste collection services for the project area. Recyclable waste are processed at the GreenWaste Material Recovery Facility and non-recyclable waste is landfilled at the Guadalupe Landfill.

Regulatory Setting

State Regulations

California Integrated Waste Management Act

California's Integrated Waste Management Act of 1989, AB 939, subsequently amended by SB 1016, 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 prepare and submit a Source Reduction and Recycling Element.

[22] San Jose/Santa Clara Water Pollution Control Plan, 2013, The Plant Master Plan, http://www.sanjoseculture.org/DocumentCenter/View/38425, accessed August 27, 2018.

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 a jurisdiction's 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 capita disposal rate.

In 2011, AB 341 was passed that 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. In August 2015, CalRecycle submitted a report to the legislature outlining the strategy to achieve this policy goal.[23]

California Solid Waste Reuse and Recycling Access Act of 1991

The California Solid Waste Reuse and Recycling Access Act requires areas in development projects to be set aside for collecting and loading recyclable materials. This Act required CalRecycle to develop a model ordinance for adoption by any local agency. Local agencies are required to adopt the model, or an ordinance of their own, providing for adequate areas in development projects for the collection and loading of recyclable materials.

Mandatory Commercial Organics Recycling

In October 2014, Governor Brown signed AB 1826[24] requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses, as well as multi-family residential dwellings that consist of 5 or more units. "Organic waste" means food waste; fats, oils, and grease; green waste; landscape and pruning waste; nonhazardous wood waste; and food-soiled paper waste that is mixed in with food waste. Greenhouse gas (GHG) emissions result from the decomposition of organic wastes in landfills. Mandatory recycling of organic waste is aimed at helping achieve California's aggressive recycling and GHG emission goals. The implementation schedule is as follows:

- January 1, 2016: Local jurisdictions were required to have in place an organic waste recycling program in place. Jurisdictions shall conduct outreach and education to inform businesses how to recycle organic waste in the jurisdiction, and conduct monitoring to identify those not recycling and notify them of the law and how to comply.
- April 1, 2016: Businesses that generate 8 cubic yards of organic waste per week were required to arrange for organic waste recycling services.

[23] California Department of Resources Recovery and Recycling, AB 341 Report to the Legislature, ,https://www2.calrecycle.ca.gov/Publications/Documents/1538/20151538.pdf, accessed August 27, 2018.

[24] Mandatory Commercial Organics, 2016, Mandatory Commercial Organics Recycling, http://www.calrecycle.ca.gov/recycle/commercial/organics/, accessed August 27, 2018.

- January 1, 2017: Businesses that generate 4 cubic yards of organic waste per week were required to arrange for organic waste recycling services.
- August 1, 2017 and Ongoing: Jurisdictions were required to provide information about their organic waste recycling program implementation in the annual report submitted to CalRecycle.
- Fall 2018: After receipt of the 2016 annual reports submitted on August 1, 2017, CalRecycle shall conduct its formal review of those jurisdictions that are on a two-year review cycle.
- January 1, 2019: Businesses that generate 4 cubic yards or more of commercial solid waste per week shall arrange for organic waste recycling services.
- Fall 2020: After receipt of the 2019 annual reports submitted on August 1, 2020, CalRecycle shall conduct its formal review of all jurisdictions.
- Summer/Fall 2021: If CalRecycle determines that the statewide disposal of organic waste in 2020 has not been reduced by 50 percent of the level of disposal during 2014, the organic recycling requirements on businesses will expand to cover businesses that generate 2 cubic yards or more of commercial solid waste per week. Additionally certain exemptions, previously discussed, may no longer be available if this target is not met.

Global Warming Solutions Act of 2006, Scoping Plan

The California Global Warming Solutions Act of 2006 (also known as AB 32) Scoping Plan, which was adopted by the California Air Resources Board, 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, 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 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 5 or more units to arrange for recycling services. This requirement became effective on July 1, 2012.

CALGreen Building Code

CALGreen 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. This Code requires that project applicants prepare a Waste Management Plan, for on-site sorting or construction debris, which is submitted to the City Campbell for approval.

The Waste Management Plan is required to include the following:

- 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 can 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.

Regional Regulations

The California Integrated Waste Management Act of 1989 (AB 939) requires each County to prepare and adopt a Countywide Integrated Waste Management Plan (CIWMP). Santa Clara County government and all the cities in the county have prepared and adopted elements that comprise the CIWMP.

Local Regulations

In compliance with CALGreen and the California Integrated Waste Management Act of 1989, and to encourage the conservation of natural resources and reduce waste in landfills generated by construction projects, Chapter 6.12, Recycling and Salvaging of Construction and Demolition Debris, of the City's Municipal Code requires construction debris to be recovered and salvaged. Section 6.12.030, Diversion Requirements, states that at least 50 percent of the construction and demolition debris tonnage from all covered projects shall be diverted from landfills by using recycling, reuse, salvage, and other diversion programs. Covered projects include:

- Demolition of 500 square feet or more.
- Renovation, remodel or addition to an existing structure.
- The construction of a new structure, greater than 2,000 square feet.
- Valuation of the work that exceeds $250,000, as determined by the building official.

Chapter 6.04, Garbage and Rubbish Disposal, details the requirements related to the accumulation of solid waste, the types of receptacles to be used, rubbish transportation, refuse collection, collection of recyclable materials, enforcement, fees, and penalties. This chapter mandates that commercial businesses, provide adequate, accessible, and convenient areas for collecting and loading recyclable materials.

Chapter 6.10, Nuisance Abatement and Administrative Penalties, defines excessive littering as a public nuisance and establishes guidelines for the correction of property maintenance violations and nuisances that afford due process and procedural guarantees to affected property owners.

Existing Conditions

West Valley Collection and Recycling (WVC&R) provides solid waste collection, transportation, and disposal services in the City of Campbell. The West Valley Solid Waste Management Authority (Authority) was established in 1998 as a Joint Powers Authority by the Santa Clara County communities of Campbell, Saratoga, Monte Sereno, and Los Gatos to arrange for and manage the collection, disposal, recycling and landfill diversion of solid waste originating in the four member municipalities. The Authority has contracted with WVC&R to provide the collection, disposal, and recycling services in the Authority.[25]

[25] West Valley Solid Waste Management Authority, https://www.wvswma.org/, accessed August 27, 2018.

UTILITIES AND SERVICE SYSTEMS

There are 13 landfills that serve the City of Campbell. Approximately 90 percent of the solid waste from the city is sent to the Guadalupe Sanitary Landfill, located in San José.[26] The landfill is estimated to have a remaining capacity of 11,055,000 cubic yards, or 38 percent of its total capacity, as of January 2011. The closure date for this landfill is January 2048. The Guadalupe Sanitary Landfill has a permitted throughput of 1,300 tons per day.[27] In 2016, the daily throughput for Guadalupe Landfill was 545 tons per day.[28] Therefore, the landfill has a residual capacity for 755 tons per day. In 2016, the solid waste collected from the City of Campbell accounted for approximately 90 tons per day.[29] In 2016, the statewide residential per capita disposal rate was 4.9 pounds per person per day (PPD), and the statewide employee per capita disposal rate was 11.4 pound per employee per day.[30]

The City of Campbell has been in compliance with AB 939 since 2007 (see Table 4.14-2), which is the year when the per capita disposal measurement system was adopted to identify whether goals established by the Integrated Waste Management Act of 1989 have been met.[31]

TABLE 4.14-2 PER CAPITA DISPOSAL RATE TRENDS

Report Year	Target Disposal Rate Population	Per Capita Population PPD	Target Disposal Rate Employment	Per Capita Employment PPD	Number of Diversion Programs
2007	5.2	4.7	8.3	7.6	40
2008	5.2	4.4	8.3	7.5	40
2009	5.2	3.8	8.3	7.0	40
2010	5.2	3.9	8.3	8.1	40
2011	5.2	3.8	8.3	7.3	39
2012	5.2	4.0	8.3	7.1	40
2013	5.2	4.1	8.3	7.0	41
2014	5.2	4.1	8.3	6.8	41
2015	5.2	4.2	8.3	6.6	41
2016	5.2	4.5	8.3	6.8	42

Notes: PPD = pounds per person per day
Source: California Department of Resources Recovery and Recycling (CalRecycle), 2018, Per Capital Disposal Rate Trends, https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/ReviewReports, accessed December 18, 2018.

[26] California Department of Resources Recovery and Recycling, 2018, Jurisdiction Disposal by Facility, http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=ReportYear%3d2017%26ReportName%3dReportEDRSJurisDisposalByFacility%26OriginJurisdictionIDs%3d70, accessed August 27, 2018.

[27] California Department of Resources Recovery and Recycling, 2018, Facilities/Site Summary Details: Guadalupe Sanitary Landfill, http://www.calrecycle.ca.gov/SWFacilities/Directory/43-AN-0015/Detail/, accessed August 27, 2018.

[28] California Department of Resources Recovery and Recycling, 2018, 2016 Landfill Tonnage Report, http://www.calrecycle.ca.gov/SWFacilities/Landfills/tonnages/, accessed August 27, 2018.

[29] California Department of Resources Recovery and Recycling, 2018, Jurisdiction Disposal by Facility, http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=ReportYear%3d2017%26ReportName%3dReportEDRSJurisDisposalByFacility%26OriginJurisdictionIDs%3d70, accessed August 27, 2018.

[30] California Department of Resources Recovery and Recycling, California's Statewide Per Resident, Per Employee, and Total Disposal Since 1989, http://www.calrecycle.ca.gov/lgcentral/GoalMeasure/DisposalRate/Graphs/Disposal.htm, accessed August 27, 2018.

[31] California Department of Resources Recovery and Recycling, 2018, Per Capital Disposal Rate Trends, https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/ReviewReports, accessed August 7, 2018.

4.14.3.2 IMPACT DISCUSSION

Standards of Significance

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in the Impact Analysis below uses the following standards of significance. The proposed project would have a significant impact on solid waste service if:

- Would not be served by a landfill(s) with sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs.
- Would be out of compliance with federal, State, and local statues and regulations related to solid waste.

Impact Analysis

The following impact discussion analyzes the project's impact using the standards of significance as identified in the Standards of Significance above.

UTIL-8 The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs.

Demolition activities during construction of the proposed project would generate approximately 1,568 tons of waste (see Table 4.14-3). As required in the City of Campbell Municipal Code, the construction contractor would divert a minimum of 50 percent of the total construction and demolition debris. The City would also require the project applicant to prepare a Waste Management Plan (WMP) prior to the issuance of building permits.

TABLE 4.14-3 ESTIMATED PROJECT DEMOLITION DEBRIS

Land Use	Existing Building (SF)	Conversion Rate (Tons/SF)[a]	Demolition Quantity (Tons)	Demolition Quantity After 50% Mandated Diversion (Tons)
Building Debris	68,141	0.046	3,135	1,568

Notes: SF = square foot
a. California Air Pollution Control Officers Association, 2017, California Emissions Estimator Model Version 2016.3.2 User's Guide, Appendix A.
Source: PlaceWorks, 2018.

For the operational phase, the proposed project would generate a net increase in solid waste generation of approximately 833 pounds per day (0.42 tons/day) (see Table 4.14-4), or 153 tons/year.

Both demolition and operational waste generation represent an insignificant amount compared to the 755 tons of remaining daily throughput capacity of Guadalupe Sanitary Landfill. Therefore, the proposed project would not cause the landfill to exceed permitted capacity and the impact is *less than significant.*

TABLE 4.14-4 ESTIMATED PROJECT SOLID WASTE GENERATION

Land Use	Quantity (SF)	Rate[a] (Pounds/ SF per Day)	Total (Pounds/ Day)
Proposed Project			
General Office Building	161,870	0.006	971
Existing Conditions			
General Office Building	22,918	0.006	138
Net Increase			833

a. Source: CalRecycle, 2018, Estimated Solid Waste Generation Rates, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, accessed August 28, 2018.

Significance without Mitigation: Less than significant.

UTIL-9 The proposed project would comply with federal, State, and local statutes and regulations related to solid waste.

In 2016, the solid waste disposed from Campbell residents and businesses totaled 36,137 tons.[32] As discussed under impact discussion UTILS-8, the proposed project would generate approximately 179 tons per year.

The City of Campbell has been in compliance with the intent of AB 939 since 2007, which is the year when the per capita disposal measurement system was adopted to identify whether goals established by the Integrated Waste Management Act of 1989 have been met.[33]

The WVC&R is implementing a series of programs for recycling materials that significantly reduce the amount of waste the City sends to landfills. Currently services for residential users include metal, glass, paper, plastic, and e-waste recycling. Recycling of green waste is also available. In addition, concrete, dirt and general debris recycling is available for commercial users. In addition, the project would be subject to the City of Campbell's Municipal Code, for the recycling of construction debris. The City of Campbell Municipal Code mandates that 50 percent of the construction and demolition debris tonnage be diverted from landfills. The project would divert 50 percent of demolition waste and will prepare a waste management plan in compliance with CalGreen regulations. The municipal code also mandates that commercial businesses provide adequate, accessible, and convenient areas for collecting and loading recyclable materials, which the proposed project would provide. Compliance with applicable State and local regulations would ensure that the impact would be *less than significant.*

[32] California Department of Resources Recovery and Recycling, 2018, Jurisdiction Disposal by Facility, Santa Clara - Campbell https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility, accessed August 27, 2018.

[33] California Department of Resources Recovery and Recycling, 2018, Per Capital Disposal Rate Trends, http://www.calrecycle.ca.gov/LGCentral/Reports/Viewer.aspx?P=JurisdictionID%3d70%26ReportName%3dDPGraphPopEmpNumbers%26ShowParameters%3dfalse%26AllowNullParameters%3dFalse, accessed August 27, 2018.

Significance without Mitigation: Less than significant.

4.14.3.3 CUMULATIVE IMPACTS

UTIL-10 The proposed project, in combination with past, present, and reasonably foreseeable development, would not result in significant impacts with respect to solid waste.

The area considered for cumulative impacts is the County of Santa Clara. There are three primary landfills in the county—the Guadalupe Sanitary Landfill, Kirby Canyon Recycling and Disposal Facility, and Newby Island Sanitary Landfill.[34] The Monterey Peninsula Landfill, Billy Wright Disposal Site, and John Smith Road Landfill are located outside the county and are the remaining three primary landfills that serve the county.

Other projects would result in increased population and employment in Santa Clara County. The total population is projected to increase from 1,877,700 in 2015 to 2,423,500 in 2040. The number of jobs is projected to increase from 1,003,780 in 2015 to 1,229,520 in 2040.[35] Using the statewide residential per capita disposal rate of 4.9 PPD, and the statewide employee per capita disposal rate of 11.4 pound per employee per day,[36] Table 4.14-5 shows that the total increase in solid waste generation from 2015 to 2040 is 5,360,726 pounds/day or 2,680 tons/day. The existing remaining capacity of the landfills is approximately 112 million tons per day.[37] Thus there is sufficient landfill capacity in the region for the cumulative increase in solid waste disposal.

TABLE 4.14-5 INCREASE IN SOLID WASTE GENERATION, 2010-2040

Solid Waste Generation Source	Increase	Solid Waste Generation Rate[a] (PPD)	Solid Waste Generated (pounds/day)
Residents	545,800	4.9	2,674,420
Employees	225,740	11.9	2,686,306
Total			5,360,726

Notes PPD = pounds per person per day
a. Source: California Department of Resources Recovery and Recycling (CalRecycle), California's Statewide Per Resident, Per Employee, and Total Disposal Since 1989, http://www.calrecycle.ca.gov/lgcentral/GoalMeasure/DisposalRate/Graphs/Disposal.htm.
Source: PlaceWorks, 2018.

Waste Valley Collection and Recycling confirmed their ability to service the proposed project in combination with all the other development projects in the area without incurring any significant impacts.[38]

[34] California Department of Resources Recovery and Recycling, 2018, 2016 Landfill Summary Tonnage Report, http://www.calrecycle.ca.gov/SWFacilities/Landfills/tonnages/, accessed August 27, 2018.

[35] Association of Bay Area Governments, 2013, Projections 2013.

[36] California Department of Resources Recovery and Recycling, California's Statewide Per Resident, Per Employee, and Total Disposal Since 1989, http://www.calrecycle.ca.gov/lgcentral/GoalMeasure/DisposalRate/Graphs/Disposal.htm, accessed August 8, 2018.

[37] California Department of Resources Recovery and Recycling, 2018, SWIS Facility/Site Search, https://www2.calrecycle.ca.gov/SWFacilities/Directory/Search.aspx, accessed September 11, 2018.

[38] West Valley Collection and Recycling, Phone conversation with Mrs. Weslie McConkey, Special Projects Manager, to Dina El Chammas Gass, Project Engineer/Planner, PlaceWorks, Dated September 05, 2018.

Furthermore, as of January 2019, businesses in California that generate 4 cubic yards or more of commercial solid waste per week will be required to arrange for organic waste recycling services. As required by the City of Campbell Municipal Code, all development projects within Campbell must divert a minimum of 50 percent of their total construction and demolition debris from landfills. In addition, all current and future projects, and the general public, shall abide by Chapters 6.04 and 6.10 of the City of Campbell's municipal code pertaining to the management of solid waste including the management of excessive littering. Compliance with these regulations would help to divert solid waste from cumulative development within Campbell and Santa Clara County.

Overall, because existing landfill capacity would be sufficient to accommodate projected growth in the county and cumulative projects would be required to comply with applicable solid waste generations, cumulative impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

4.14.4 STORMWATER INFRASTRUCTURE

This section outlines the regulatory setting, describes environmental setting, and discusses potential impacts of the proposed project with regard to stormwater infrastructure.

4.14.4.1 ENVIRONMENTAL SETTING

Regulatory Framework

Federal Regulations

Clean Water Act

The CWA authorizes the EPA to implement water-quality regulations. The NPDES permit program under Section 402(p) of the CWA controls water pollution by regulating stormwater discharges into the waters of the United States. California has an approved State NPDES program. The EPA has delegated authority for water permitting to the State Water Board.

Section 303(d) of the CWA requires that each state identify water bodies or segments of water bodies that are "impaired" (i.e., not meeting one or more of the water-quality standards established by the State). These waters are identified in the Section 303(d) list as waters that are polluted and need further attention to support their beneficial uses. Once the water body or segment is listed, the State is required to establish the Total Maximum Daily Load (TMDL) for the pollutant causing the conditions of impairment. TMDL is the maximum amount of a pollutant that a water body can receive and still meet water quality standards. Typically, TMDL is the sum of the allowable loads of a single pollutant from all contributing point and non-point sources. The intent of the 303(d) list is to identify water bodies that require future development of a TMDL to maintain water quality. In accordance with Section 303(d), the RWQCB has identified impaired water bodies within its jurisdiction, and the pollutants or stressors responsible for impairing the water quality.

The receiving water for the project site is Lower San Francisco Bay, which is listed on the Section 303(d) List of Water Quality Limited Segments for chlordane, dichloro diphenyl trichloroethane (DDT), dieldrin, dioxin compounds, furan compounds, invasive species, mercury, PCBs, and trash.[39] Chlordane, DDT, and dieldrin are organochlorine insecticides; PCBs were commonly used as coolants in electrical equipment.

National Pollutant Discharge Elimination System

The 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 (MS4). Under the NPDES program, all facilities that discharge pollutants into waters of the United States are required to obtain a NPDES permit. Requirements for stormwater discharges are also regulated under this program. In California, the NPDES permit program is administered by the State Water Board through the nine RWQCBs. Discharge of stormwater runoff from construction sites of 1 acre or more is covered under the Statewide General Construction Permit, as discussed below.

State Regulations

Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act (Water Code Section 13000 *et seq.*) is the basic water quality control law for California. Under this Act, the State Water Board has ultimate control over state water rights and water-quality policy. In California, the EPA has delegated authority to issue NPDES permits to the State Water Board. The nine RWQCBs carry 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.

The project site is within the Guadalupe River Watershed, which is under the jurisdiction of the San Francisco Bay RWQCB and within the San Francisco Bay Basin. The Basin Plan for the San Francisco Bay Basinwas last updated in 2017. The 2017 Basin Plan gives direction on the beneficial uses of the state waters within Region 2 (i.e., the jurisdiction of the San Francisco Bay RWQCB); 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.

Statewide General Construction Permit

Construction projects of 1 acre or more are regulated under the General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Board in 2012. Projects obtain coverage by developing and implementing a Stormwater Pollution Prevention Plan estimating sediment risk from construction activities to receiving waters, and specifying Best Management Practices (BMPs) that would be used by the project to minimize pollution of stormwater.

[39] State Water Resources Control Board, 2014, Impaired Water Bodies, http://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2010.shtml, accessed August 8, 2018.

Regional Regulations

Municipal Regional Stormwater NPDES Permit

Municipal stormwater discharge in the City of Campbell is subject to the WDRs of the MS4 Permit (Order Number R2-2015-0049, NPDES Permit No. CAS612008). Provision C.3 of the MS4 Permit requirements apply to all new development or redevelopment projects that create or replace 10,000 square feet of impervious surfaces and specific land use projects that create or replace 5,000 square feet of impervious surfaces (i.e., auto service facilities, retail gasoline outlets, restaurants, and/or uncovered surface parking). Provision C.3 of the MS4 Permit 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. New development projects must treat 100 percent of the calculated runoff (based on the sizing criteria described in the C.3 provisions of the MS4 Permit) with LID treatment measures that include harvesting and reuse, infiltration, evapotranspiration, or biotreatment/bioretention.

Santa Clara Valley Urban Runoff Pollution Prevention Program

The Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) is an association of fifteen agencies in Santa Clara Valley that share a common permit to discharge stormwater to South San Francisco Bay.

Post-construction stormwater quality requirements pursuant to the SCVURPPP are explained in the SCVURPPP C.3 Stormwater Handbook issued in June 2016. The C.3 Stormwater Handbook includes instructions for implementing site design measures, source controls, stormwater treatment measures, construction site controls, and LID measures.

The C.3 Handbook sets forth thresholds for when various categories of water quality protection measures are required and offer step-by-step instructions on how to incorporate stormwater control and LID designs into project applications.[40]

Local Regulations

Chapter 14.02, Stormwater Pollution Control, of the City of Campbell Municipal Code relates to 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 municipal storm drain system comply with applicable provisions of the CWA and the current NPDES Permit No. CAS612008, including amendments and RWQCB approvals.

[40] Santa Clara Valley Urban Runoff Pollution Prevention Program, 2016, *C3, Stormwater Handbook*, http://scvurppp-w2k.com/pdfs/1516/c3_handbook_2016/SCVURPPP_C.3_Technical_Guidance_Handbook_2016_Chapters.pdf, accessed August 8, 2018.

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 five-year storm event.[41] 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 groundwater recharge facilities along Los Gatos Creek within the City of Campbell that recharge the regional groundwater basin.

The 4.5 acre project site is currently developed with an office building and a surface parking lot. The total existing impervious surface area is 153,825 square feet and the existing pervious surface area is 43,182 square feet. Runoff from the existing site is conveyed to a 30-inch reinforced concrete pipe (RCP) that runs along the north boundary of the site. Runoff is discharged from the storm drain into Los Gatos Creek.[42]

4.14.4.2 IMPACT DISCUSSION

Standards of Significance

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect. The City of Campbell uses the questions in Appendix G of the CEQA Guidelines as the thresholds of significance for projects requiring environmental review under CEQA. Based on this consideration, the analysis in the Impact Analysis below uses the following standards of significance:

> The proposed project would have a significant stormwater-related impact if it would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.

Impact Analysis

The following impact discussion analyzes the project's impact using the standards of significance as identified in the Standards of Significance above.

[41] A five-year storm event is a storm event that has a 1 in 5 chance of occurring in any given year.

[42] County of Santa Clara, 2018, City of Campbell Storm Drain System, http://sccgov.maps.arcgis.com/apps/webappviewer/index.html?id=ee7cd17bafdc4c1ead74e243b7ce8455, accessed August 27, 2018.

US-11 **The proposed project would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.**

The proposed project would include the installation of four (4) flow through planters and a bioretention area as shown on Figure 4.8-1. This would collect runoff from roof tops and paved parking areas for treatment and flow control prior to discharge into the City's storm drain system. Overflow runoff from the four (4) planters is discharged from the site through a new 15-inch storm drain that will be connected to the existing 30-inch storm drain running along the northern boundary of the site. Overflow from the bioretention area is discharged from the site through a new 12-inch storm drain that is connected to the same 30-inch storm drain mention above.

As discussed under impact discussion HYDRO-4 in Chapter 4.8, Hydrology and Water Quality, implementation of the proposed project would decrease the amount of impervious surfaces. The project will also implement stormwater BMPs in accordance with the SCVURPPP guidelines. These two measures will result in post-project stormwater volumes that are less than pre-project development volumes. Furthermore, since the project site does not increase impervious surface over pre-project conditions, hydromodification (HM) measures are not required.[43]

The project does include the construction of drainage facilities on-site, in addition to new connections to the existing public storm drains. The construction-related impacts associated with these improvements are analyzed throughout the EIR. The analysis under this impact focuses on whether the City would need to expand its storm system capacity in order to handle the runoff generated by the project.

The proposed project would result in a reduction in stormwater runoff and would not modify the timing and volume of runoff, no expansion of existing stormwater facilities or the construction of new facilities by the City is required. Therefore, the project would result in a *less-than-significant* impact with respect to storm drain facilities.

Significance without Mitigation: Less than significant.

4.14.4.3 CUMULATIVE IMPACT DISCUSSION

UTIL-12 **The proposed project, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to stormwater infrastructure.**

The area considered for cumulative impacts include the areas within the City of Campbell that discharge stormwater to the same storm drain system as the project site, with ultimate discharge into the Lower San Francisco Bay. Additional projects include cumulative growth associated with City-approved projects and

[43] HM requirements need to be complied with if the development of the project causes a change in the timing and volume of runoff from a site.

other foreseeable future projects (see Table 4-1). Development of approved and future projects within the City of Campbell could increase stormwater runoff.

All new development or redevelopment projects in the City of Campbell would be required to comply with SCVWD's C.3 provisions that require BMPs to be implemented. These BMPs include site design, source control, and treatment control measures that provide both flow control and treatment to runoff before it enters the storm drain system. Similarly, all projects would be required to comply with the General Construction Permit, prepare a Stormwater Pollution Prevention Plan, and implement BMPs to minimize erosion and siltation impacts during construction. With implementation of site-specific BMPs and compliance with the SCVWD guidelines, impacts of the proposed project and cumulative projects would have a *less-than-significant* cumulative impact on stormwater infrastructure.

Significance without Mitigation: Less than significant.

4.14.5 ENERGY CONSERVATION

4.14.5.1 ENVIRONMENTAL SETTING

This section provides a general description of the regulatory setting addressing existing electric and natural gas services and infrastructure, and supply and demand in the City of Campbell.

Regulatory Setting

Federal Regulations

Energy Independence and Security Act of 2007

Signed into law in December 2007, the Energy Independence and Security Act 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. This Act includes tax incentives for 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.

Natural Gas Pipeline Safety Act of 1968

The Natural Gas Pipeline Safety Act of 1968 authorizes the United States Department of Transportation to regulate pipeline transportation of flammable, toxic, or corrosive natural gas and other gases as well as the transportation and storage of liquefied natural gas. The Pipeline and Hazardous Materials Safety Administration (PHMSA) within the Department of Transportation develops and enforces regulations for

the safe, reliable, and environmentally sound operation of the nation's 2.6-million-mile pipeline transportation system.

National Energy Policy

Established in 2001 by the National Energy Policy Development Group, the National Energy 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 Long Term Energy Efficiency Strategic Plan

Adopted in September 2008 and updated in January 2011, the California Public Utilities Commission (CPUC) Long Term Energy Efficiency Strategic Plan 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-, mid-, and long-term strategies to assist in achieving these goals. The 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 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.

The CPUC and the California Energy Commission have adopted the following goals to achieve zero net energy 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 Energy Code

The State of California provides a minimum standard for energy conservation through Title 24, Part 6 California Code of Regulations, commonly referred to as the California Energy Code. The California Energy Code was first adopted by the California Energy Resources Conservation and Development Commission in

June 1977. The standards are updated on a three- year cycle to allow for consideration and possible incorporation of new energy efficiency technologies and methods. In June 2015, the California Energy Code adopted the 2016 Building and Energy Efficiency Standards, which went into effect on January 1, 2017. The 2019 Building and Energy Efficiency Standards, which were adopted on May 9, 2018, go into effect starting January 1, 2020.

CALGreen Building Code

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 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.

Compliance with CALGreen 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.

2016 Appliance Efficiency Regulations

The 2016 Appliance Efficiency Regulations (Title 20, California Code of Regulations Sections 1601 through 1608) include standards for both federally regulated appliances and nonfederally-regulated appliances. Twenty-three categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the state, and those designed and sold exclusively for use in recreational vehicles or other mobile equipment. 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.

State Greenhouse Gas Regulations

The Governor’s GHG Reduction Executive Order S-3-05 was signed on June 1, 2005, and set GHG reduction targets for the State. Soon after, AB 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 developed a Scoping Plan to be updated every five years, outlining California’s approach to reducing GHG emissions.

The latest Update to the Climate Change Scoping Plan sets a 2030 target of 40 percent GHG emissions reductions below 1990 levels.[44] The California Air Resources Board approved the Update to the Climate Change Scoping Plan on December 14, 2017, , as required by AB 32. For a detailed discussion on these regulations, see Chapter 4.6, Greenhouse Gas Emissions, of this Draft EIR.

California Energy Benchmarking and Disclosure

AB 1103 (2007) required that electric and gas utilities maintain records of the energy consumption data of all non-residential buildings to which they provide service and, upon authorization of a non-residential building owner or operator, upload all of the energy consumption data to the EPA Energy Star Portfolio Manager. This statute further required that a non-residential building owner or operator disclose Energy Star Portfolio Manager benchmarking data and ratings, for the most recent 12-month period, to a prospective buyer, lessee, or lender.

On October 8, 2015, the Governor signed AB 802 which revised and recast the above provisions. The new law directed the California Energy Commission to establish a statewide energy benchmarking and disclosure program, and enhanced the Commission's existing authority to collect data from utilities and other entities for the purposes of energy forecasting, planning, and program design. Among the specific provisions, AB 802 required utilities to maintain records of the energy usage data of all buildings to which they provide service for at least the most recent 12 complete months. The bill required each utility, upon the request and authorization of the owner, owner's agent, or operator of a covered building, to deliver or provide aggregated energy usage data for a covered building to the owner, owner's agent, operator, or to the owner's account in the Energy Star Portfolio Manager. The bill also authorized the Commission to specify additional information to be delivered by utilities for certain purposes.

Local Regulations

Chapter 18.26, Green Building Standards Code, of the City of Campbell's Municipal Code adopts the most current edition of CALGreen by reference.

Existing Conditions

Electricity

Grid electricity and natural gas service in the City of Campbell is provided by Pacific Gas and Electric Company (PG&E). PG&E is a publicly traded utility company which generates, purchases, and transmits energy under contract with the CPUC. PG&E's 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.[45]

PG&E's electricity distribution system consists of 106,681 circuit miles of electric distribution lines and 18,466 circuit miles of interconnected transmission lines. The electricity is generated by a combination of

[44] California Air Resources Board, 2017, California's 2017 Climate Change Scoping Plan, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf, accessed March 27, 2019.

[45] PG&E, 2018, Company Info, http://www.pge.com/about/company/profile/, accessed August 27, 2018.

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 that 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.

PG&E produces or buys its energy from a number of conventional and renewable generating sources, which travel through PG&E's electric transmission and distribution systems. The power mix PG&E provided to customers in 2016 consisted of non-emitting nuclear generation (24 percent), large hydroelectric facilities (12 percent), and eligible renewable resources (33 percent), such as wind, geothermal, biomass, solar and small hydro.[46] The remaining portion came from natural gas (17 percent) and unspecified power (14 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 2016, PG&E served 28 percent of their retail electricity sales with renewable power. PG&E's percentage of renewable power currently under contract for 2020 is 33 percent.[47]

In 2017 PG&E's preliminary projected average annual electricity demand growth (mid-demand forecast) between 2018 and 2028 is 0.99 percent. Total mid-electricity consumption in PG&E's service area was 281,666 gigawatt-hour per year in 2015 and is forecast to increase to 319,484 G gigawatt-hours in 2027.[48]

The existing electrical system in the project vicinity consists of overhead and underground facilities.

Natural Gas

PG&E's natural gas (methane) pipe delivery system includes 42,000 miles of distribution pipelines, and 6,700 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 15 million gas customers in northern and central California.[49] PG&E has numerous pipeline safety programs, policies, and procedures in place to ensure the safety of customers, employees and the public. These programs include:

[46] PG&E, 2016, PG&E's 2016 Power Mix, https://www.pge.com/pge_global/local/assets/data/en-us/your-account/your-bill/understand-your-bill/bill-inserts/2017/november/power-content.pdf, accessed August 27, 2018.

[47] PG&E, 2018, Exploring Clean Energy Solutions, https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/clean-energy-solutions/clean-energy-solutions.page, accessed August 27, 2018.

[48] California Energy Commission, 2017, California Energy Demand 2018-2028 Preliminary Forecast, https://efiling.energy.ca.gov/getdocument.aspx?tn=220615, accessed August 27, 2018.

[49] PG&E, 2018, Learn about the PG&E natural gas system, https://www.pge.com/en_US/safety/how-the-system-works/natural-gas-system-overview/natural-gas-system-overview.page, accessed August 27, 2018

- Valve automation to improve the ability to quickly shut off the flow of gas in the event of a significant change in pressure.
- Regular leak detection surveys across a 70,000-square mile service area for gas leaks resulting in a 99 percent reduction of minor leaks.
- Regular monitoring and inspection of nearly 7,000 miles of gas transmission pipelines and 42,000 miles of distribution pipelines to identify and address concerns before they become a hazard.
- Replacement of steel distribution main, which can be prone to leaks, with modern, new materials.
- Community Pipeline Safety Initiative which ensures first responders and emergency response crews have critical access to pipelines in the event of an emergency or natural disaster.[50]

In 2017 PG&E's preliminary projected average annual demand growth (mid-demand forecast) between 2018 and 2028 is 0.75 percent. Total mid-natural gas consumption in PG&E's service area was 4,587 million therms per year in 2017 and is forecast to increase to 5,019 million therms in 2028.[51]

The PG&E gas transmission pipeline nearest the project site runs along Winchester Boulevard 1000 feet west of the site.[52]

4.14.5.2 IMPACT DISCUSSION

Standards of Significance

Section 15064.7 of the CEQA Guidelines explains that thresholds of significance for determining environmental effects are identifiable quantitative, qualitative, or performance levels, non-compliance with which means the effect would normally be determined to be significant and compliance with which means the effect normally would be less than significant. Section 15064.7 of the CEQA Guidelines encourages each public agency to develop and publish its own thresholds of significance that the agency uses in evaluating the significance of environmental effects for projects in its jurisdiction. Appendix G of the CEQA Guidelines provides sample questions that can be used to determine whether a project would have a significant effect.

In order to ensure that energy implications are considered in project decisions, Appendix F, Energy Conservation, of the CEQA Guidelines requires 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. 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

[50] PG&E, 2018, PG&E's Gas safety Programs, https://www.pge.com/en_US/safety/gas-safety/safety-initiatives.page, accessed September 13, 2018.

[51] California Energy Commission, 2017, California Energy Demand 2018-2028 Preliminary Forecast, https://efiling.energy.ca.gov/getdocument.aspx?tn=220615, accessed August 27, 2018

[52] PG&E, 2014, Gas Transmission System Map web page, http://www.pge.com/en/safety/systemworks/gas/transmissionpipelines/index.page, accessed August 27, 2018.

or for the City of Campbell. Therefore, this EIR analysis determined that impacts would be significant if the proposed project 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 paralleling the threshold determinations for other utility and service systems under Appendix G, Environmental Checklist of the CEQA Guidelines. To further the intent of Appendix F, Energy Conservation, relevant, potential impacts listed in that appendix are also incorporated in the evaluation.

Appendix F lists the following possible impacts to energy conservation that should be considered to the extent they are applicable and relevant to a particular project:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed.
- The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- The effects of the project on peak and base period demands for electricity and other forms of energy.
- The degree to which the project complies with existing energy standards.
- The effects of the project on energy resources.
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Impact Analysis

The following impact discussion analyzes the project's impact using the standards of significance as identified in the Standards of Significance above.

UTIL-13	**The proposed project 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 project would be served by existing PG&E distribution systems that would provide natural gas and electricity. As shown in Table 4.14-6, the proposed project would require electrical services totaling an estimated 4,291,196 kilowatt-hours per year (KWhr/yr) and natural gas service up to 34,432,972 kilo British thermal units per year (KBTU/yr).These energy and natural gas consumption rates are typical for projects of this size and are modest increases in energy and gas use when considered in the context of PG&E's service territory. In addition, the proposed project would be required to comply with energy efficiency standards set forth by Title 24 of the California Administrative Code and the Appliance Efficiency Regulations. The project would also comply with CalGreen requirements related to energy and water conservation. These measures will decrease electricity and gas consumption. Therefore, the proposed project would not result in a substantial increase in natural gas and electrical service demands.

PG&E would not need to expand its supply and transmission facilities in order to handle the demand generated by the project and the impact would be *less than significant*.

Significance without Mitigation: Less than significant.

TABLE 4.14-6 ESTIMATED ELECTRICAL AND NATURAL GAS CONSUMPTION

Land Use	Square Footage	Title 24 Electricity Energy Intensity (KWhr/ SF/yr)[a]	Nontitle 24 Electricity Energy Intensity (KWhr/ SF/yr)[a]	Lighting Energy Intensity (KWhr/ SF/yr)[a]	Electricity (kWh/yr)	Title 24 Natural Gas Energy Intensity (KBTU/ SF/yr)[a]	Nontitle 24 Natural Gas Energy Intensity (KBTU/ SF/yr)[a]	Natural Gas (kBTU/yr)
Parking Lot	75,814	0	0	0.88	66,716	0	0	0
Office Park	161,870	7.64	8.4	3.97	3,237,218	21.14	0.08	3,432,972
Enclosed Parking with Elevator	146,478	3.92	0.19	2.63	987,262	0	0	0
Total					**4,291,196**			**3,432,972**

Note: Natural gas and electricity usage rates based on the 2016 Building Energy Efficiency Standards.
a. Source: CalEEMod 2016.3.2.

4.14.5.3 CUMULATIVE IMPACTS

UTIL-14 The proposed project, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to energy conservation.

The area considered for cumulative impacts to electricity and natural gas supplies and facilities is PG&E's service area. The total mid-electricity consumption is projected to be 319,484 G gigawatt-hours in 2027. Total mid-natural gas consumption in 2028 is projected to be 5,019 million therms. Other projects throughout PG&E's service area would increase electricity and natural gas demands.

The forecasts provided by California Energy Commission are used in several applications, including CPUC resource planning. The CPUC has identified the Integrated Energy Policy Report process as "the appropriate venue for considering issues of load forecasting, resource assessment, and scenario analyses, to determine the appropriate level and ranges of resource needs for load serving entities in California." The final forecasts will also be an input to the California Independent System Operator Transmission Planning Process as well as controlled grid studies and in electricity supply-demand (resource adequacy) assessments.[53]

[53] California Energy Commission, 2017, California Energy Demand 2018-2028 Preliminary Forecast, https://efiling.energy.ca.gov/getdocument.aspx?tn=220615, accessed August 27, 2018.

All projects within PG&E's service area would be required to comply with energy efficiency standards set forth by Title 24 of the California Administrative Code and the Appliance Efficiency Regulations. Projects would also comply with CalGreen requirements related to energy and water conservation. Water conservation policies mandated by the SCVWD's UWMP, and the City of Campbell's Municipal Code Chapter 21.26 *Landscape Requirements* and Chapter 8.34 *Potable Water Use Restrictions will* also be implemented. These measures would reduce the overall consumption of electricity and natural gas.

It is anticipated that electricity and natural gas demands by most other projects would be accounted for in the above-referenced demand forecasts. Other projects would be subject to independent CEQA review, including analysis of impacts to electricity and natural gas supplies. Cumulative impacts would be *less than significant*, and project impacts would not be cumulatively considerable.

Significance without Mitigation: Less than significant.

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5. Significant Unavoidable Impacts

Section 15126.2 of the CEQA Guidelines requires that "direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long term effects."

Chapter 1, Executive Summary, contains Table 1-1, which summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. While actions from the project and mitigation measures, where feasible, would reduce most impacts to less-than-significant levels, the following impacts would remain significant and unavoidable after mitigation measures are applied. Please see Chapter 4.13, Transportation and Traffic, for more details on why these impacts cannot be mitigated to a less-than-significant level.

- Impact TRANS-1a: During the AM peak hour under Existing plus Project, Background plus Project, and Cumulative plus Project conditions, the intersection of San Tomas Expressway/SR 17 Southbound Ramps (Intersection #6) would continue to operate at an unacceptable LOS F with or without the addition of project-generated vehicle trips. However, the addition of project-generated trips would increase the volume-to-capacity ratios by more than 0.01 and increase the average control delay for critical movements by more than four seconds. During the PM peak hour under Cumulative plus Project conditions, this intersection would worsen from LOS E to LOS F with the addition of project-generated vehicle trips. During the AM and PM peak hours under Cumulative plus Project conditions, the queue on the SR 17 southbound off-ramp right-turn lane would extend to 26 vehicles, which is two vehicles more than the estimated storage capacity.
- Impact TRANS-1b: During the PM peak hour under Existing plus Project conditions, the addition of project-generated traffic would cause the freeway segment of southbound SR 85 from Saratoga Avenue to Winchester Boulevard to deteriorate from LOS E to F.
- Impact TRANS-2: The recommended mitigation measure would be to widen the westbound (off-ramp) approach at the intersection of the San Tomas Expressway/SR 17 southbound ramps (Intersection #6) to include a second right turn lane. Although recommended widening of the southbound off-ramp would improve traffic levels sufficient to reduce this impact to a less-than-significant level, implementation of the widening cannot be guaranteed as the off-ramp is a Caltrans facility and the intersection is County-operated. Furthermore, the recommended improvement is not part of VTA's Measure B regional improvements list.

SIGNIFICANT UNAVOIDABLE IMPACTS

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6. *Alternatives to the Proposed Project*

6.1 INTRODUCTION

The following evaluation was prepared to evaluate whether there may be feasible alternatives to the project that could avoid or substantially lessen any of the significant effects of the project. Section 15126.6, Consideration and Discussion of Alternatives to the Project, of the California Environmental Quality Act (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 a "reasonable range of alternatives."

6.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

As described above, apart from the No Project Alternative, other alternatives chosen as part of the reasonable range of alternatives should be chosen based upon their ability to feasibly attain most of the basic objectives of the project and avoid or lessen the project's significant impacts. The project would result in three significant and unavoidable impacts. No feasible mitigation measures would reduce these impacts to a less-than-significant level:

- Impact TRANS-1a: During the AM peak hour under Existing plus Project, Background plus Project, and Cumulative plus Project conditions, the intersection of San Tomas Expressway/SR 17 Southbound Ramps (Intersection #6) would continue to operate at an unacceptable LOS F with or without the addition of project-generated vehicle trips. However, the addition of project-generated trips would increase the volume-to-capacity ratios by more than 0.01 and increase the average control delay for critical movements by more than four seconds. During the PM peak hour under Cumulative plus Project conditions, this intersection would worsen from LOS E to LOS F with the addition of project-generated vehicle trips. During the AM and PM peak hours under Cumulative plus Project conditions, the queue on the SR 17 southbound off-ramp right-turn lane would extend to 26 vehicles, which is two vehicles more than the estimated storage capacity.

- **Impact TRANS-1b:** During the PM peak hour under Existing plus Project conditions, the addition of project-generated traffic would cause the freeway segment of southbound SR (State Route) 85 from Saratoga Avenue to Winchester Boulevard to deteriorate from LOS E to F.
- **Impact TRANS-2:** The recommended mitigation measure would be to widen the westbound (off-ramp) approach at the intersection of the San Tomas Expressway/SR 17 southbound ramps (Intersection #6) to include a second right turn lane. Although recommended widening of the southbound off-ramp would improve traffic levels sufficient to reduce this impact to a less-than-significant level, implementation of the widening cannot be guaranteed as the off-ramp is a Caltrans facility and the intersection is County-operated. Furthermore, the recommended improvement is not part of VTA's Measure B regional improvements list.

6.3 OVERVIEW OF PROJECT ALTERNATIVES

This chapter evaluates two alternatives, in addition to the No Project Alternative. Table 6-1 provides a summary of development program for each alternative.

TABLE 6-1 COMPARISON OF PROJECT ALTERNATIVES TO THE PROPOSED PROJECT

Alternative	Building Area (Square Feet)	Employees[a]	Maximum Office Building Height (Stories)	Maximum Garage Building Height (Stories)	Number of Parking Spaces[b]	Daily Vehicle Trips[c]
Proposed Project	161,870	719	4	5	719	1,735
No Project Alternative	71,620	318	3	N/A	318	768
Existing Zoning Alternative	77,648	194 to 345	3	2	194 to 345	832
Reduced Intensity Alternative	64,748	288	3	N/A	288	694

Notes: N/A = not applicable (surface parking only)
a. Workers for the proposed project and each alternative are estimated using the employment density of 225 gross square feet per employee, using the City's parking requirement ratio, with the exception of the Existing Zoning Alternative. Due to the range of land uses that could occur under the Existing Zoning Alternative, a range of employees is presented, based on an assumption of 225 to 400 square feet per employee.
b. Parking ratios are based Municipal Code Requirements.
c. Trip generation for all scenarios is estimated using the trip generation factor for general office buildings used in the Traffic Impact Study (TIS) for the existing office building, 10.72 daily trips per 1,000 square feet. The TIS uses two trip generation factors for general office buildings, 10.72 and 10.46 per 1,000 square feet; the higher factor is used in this table. The No Project Alternative assumes 100 percent occupancy; the trip generation estimate for the existing building in the TIS is based on actual occupancy in May 2018 of 32 percent. See: W-Trans, 2018, Traffic Impact Study for 1700 Dell Avenue, included as Appendix I to this Draft EIR.
Source: PlaceWorks, 2018.

- **No Project Alternative.** Under the No Project Alternative, the proposed project would not be developed and conditions on-site would remain as they are. The existing office building would continue in operation and the building would be fully occupied, potentially resulting in about 318 employees. Parking would be provided by the existing surface parking lot; no garage building would be built.
- **Existing Zoning Alternative.** The Existing Zoning Alternative is intended to reduce the level of vehicular traffic (and associated air quality emissions, greenhouse gas (GHG) emissions, and noise) generated

by the proposed project, and to illustrate the environmental effects that could occur from an office development project that would not utilize the P-D rezoning proposed by the project. Under the Existing Zoning Alternative the existing office building and surface parking lot would be demolished and the site would be redeveloped with a project that conforms to the requirements of the current applicable Zoning district (e.g., height and floor area standards of the C-M [controlled manufacturing] zoning district). Uses applicable to the C-M Zoning district which may operate on the project site under this alternative may include small-scale assembly, manufacturing, furniture/cabinet shops, laundries/dry cleaning plants, plastics and rubber products, warehousing, wholesaling, and distribution facilities, or wireless telecommunication facilities. This alternative would result in 194 to 345 employees, depending on the use. However, for the purpose of the Existing Zoning Alternative, the analysis focuses on the redevelopment of an office building without the Planned Development rezoning sought by the proposed project. Under the Existing Zoning Alternative, the maximum building height would be 45 feet (three stories) and the maximum floor area ratio (FAR) would be 0.40. Based on the net site area of 194,121square feet (following right-of-way dedication) and allowable FAR of 0.4, the maximum office building square footage would be 77,648 square feet. This alternative would require a smaller office building and fewer parking spaces than the proposed project. Under this alternative, the 345 required parking spaces could be provided by a surface parking lot with a two-story parking garage or subterranean parking below the office building. A project with subterranean parking could accommodate more landscaping and on-site open space than the proposed project.

- Reduced Intensity Alternative. The Reduced Intensity Alternative is intended to avoid the project's significant and unavoidable traffic impacts by reducing the size of the proposed office building by 60 percent. Under the Reduced Intensity Alternative, the existing office building and surface parking lot would be demolished and the site would be redeveloped at an intensity that would avoid the project's significant traffic impacts. Under the Reduced Intensity Alternative, the maximum office building square footage would be 64,748, approximately 17 percent smaller than the Existing Zoning Alternative, and 60 percent smaller than the proposed project (the estimated reduction required to avoid the project's significant and unavoidable traffic impacts). This alternative would result in 288 employees and require fewer parking spaces than the proposed alternative. While the building in this alternative could be either two or three stories, the reduced intensity alternative analysis assumes a three story office building. Parking could be provided by a surface parking lot (no garage building) or via partial subterranean parking. The partial subterranean parking option could accommodate more landscaping and on-site open space than the proposed project if some of the parking is proposed below the office building. Under the Reduced Intensity Alternative, the City would condition the project to preserve existing trees to the maximum extent possible while still allowing the office building to be oriented along the Dell Avenue frontage.

Table 6-2 compares the impact of each alternative to impacts of the project. See the impact assessment in Section 6.5 for details on the conclusions summarized in Table 6-2.

TABLE 6-2 COMPARISON OF PROJECT ALTERNATIVES

Topic	No Project Alternative	Existing Zoning Alternative	Reduced Intensity Alternative
Aesthetics	0	0	0
Air Quality	–	–	–
Biological Resources	0	0	0
Cultural Resources	–	0	0
Geology, Soils, and Seismicity	0	0	0
Greenhouse Gas Emissions	0	0	0
Hazards and Hazardous Materials	–	0	0
Hydrology and Water Quality	+	0	0
Land Use and Planning	0	0	0
Noise	–	–	–
Population and Housing	0	0	0
Public Services and Recreation	0	0	0
Transportation and Traffic	–	–	– –
Utilities and Service Systems	0	0	0

Note:
++ Indicates that the alternative's impacts are substantially greater when compared to the project
+ Indicates that the alternative's impacts are slightly greater when compared to the project
0 Indicates that the alternative's impacts are similar to the project
– Indicates that the alternative's impacts are slightly lessened when compared to the project.
– – Indicates that the alternative's impacts are substantially lessened compared to the project and would avoid a significant and unavoidable impact of the project.

Source: PlaceWorks, 2018.

6.4 ALTERNATIVES CONSIDERED BUT REJECTED

Section 15126.6(c) of the 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.

6.4.1 ALTERNATIVE LOCATION

Development of an alternative site was considered and rejected as being infeasible for the project. Two of the applicant's objectives for the project in combination are specific to this site:

- Revitalize the project site in a socially vibrant and economically viable manner that reflects the project site's position as a gateway to the city.
- Create an employment center that maximizes the project site's development potential.
- Promote the project site's proximity to the Los Gatos Creek pedestrian and bicycle trail and the proposed Santa Clara Valley Transportation Authority's Light Rail station at Hacienda and Winchester Boulevard, as a means to minimize the reliance of the anticipated workforce automobile travel, which in turn has the effect of limiting traffic congestion, vehicle miles traveled, and associated emissions.

The project site is located near a gateway to the City and public transit. The City of Campbell General Plan identifies several gateways to the City; the nearest designated gateway is at the interchange of Winchester Boulevard and SR-85 about 0.5 miles southwest of the project site. While not officially designated as a gateway, the project site is also very close to the boundary between Campbell and Los Gatos. The intersection of Winchester Boulevard and Hacienda Avenue is about 0.5 miles north of the project site. Construction of a light rail station at that location is part of the Vasona Corridor Light Rail Extension specified in the Santa Clara Valley Transportation Authority's Valley Transportation Plan 2040.[1]

6.4.2 RESIDENTIAL ALTERNATIVE

Development of the site with residential land use was considered and rejected, as both the General Plan land use designation and Zoning district for the site and surrounding properties prohibit residential use.

6.5 IMPACT ASSESSMENT

6.5.1 NO PROJECT ALTERNATIVE

As noted above, CEQA Guidelines Section 15126.6(e) requires that an EIR analyze a "No Project" alternative. Under the No Project Alternative, the project would not be developed. Conditions on-site would remain as they are and the existing office building would continue in operation at full occupancy. Employment on-site would be approximately 318, using an employment density of one worker per 225 square feet of office building, as is City standard when calculating vehicle spaces required for professional office uses in the C-M Zoning district, outlined in Campbell Municipal Code Section 21.28.040, Table 3-1.

Under the No Project Alternative, none of the previously discussed site improvements would occur, including the public open space area, the dedicated right-of-way, and the street improvements along Dell Avenue.

In the event that the project is not approved, potential future development on the project site may be subject to different local land use requirements and policies, as the City is undergoing a General Plan update and could also prepare a Specific Plan for the Dell Avenue corridor in the future. However, because

[1] Santa Clara County Transportation Authority, 2015, Valley Transportation Plan 2040, vtaorgcontent.s3-us-west-1.amazonaws.com/Site_Content/VTP2040_final_optimized.pdf, accessed November 7, 2018.

these future planning updates have not yet been adopted, for the purposes of this analysis, the No Project Alternative assumes that the project site would remaining in its existing use subject to existing plans and policies.

6.5.1.1 AESTHETICS

The proposed project would result in less-than-significant aesthetics impacts.

Under the No Project Alternative, the existing office building with heights ranging from one to three stories and surface parking would remain.

The site is not visible from any designated State scenic highway; therefore, neither the proposed project nor the No Project Alternative would impact scenic resources in a State scenic highway.

The existing office building and surface parking lot include outdoor lighting consisting of building exterior and parking lot lighting. Under the No Project Alternative, no new outdoor lighting would be installed. However, after compliance with City lighting ordinance, neither the project nor the No Project Alternative would generate new sources of light substantially detracting from nighttime views.

Overall, neither the proposed project nor the No Project Alternative would result in significant aesthetics impacts. Therefore, the No Project Alternative would result in *similar* impacts compared to the proposed project.

6.5.1.2 AIR QUALITY

Construction of the proposed project would create impacts associated with fugitive dust and particulate matter, and associated cancer risks and non-attainment status of the San Francisco Bay Area Air Basin (SFBAAB). These impacts would be less than significant after mitigation. The proposed project would not create any significant air quality impacts associated with operation of the proposed project.

The No Project Alternative would not involve demolition of the existing building or the construction of a new office building and parking garage. Therefore, the No Project Alternative would avoid the project's significant-but-mitigable impact.

Operation of the office building under the No Project Alternative could increase usage of the project site and project-related traffic emissions in comparison to existing conditions, as the existing office building is approximately 30- percent occupied and the No Project Alternative could involve full occupancy of the office building. These operational air quality emissions would be lower than those of the proposed project, as the No Project Alternative would involve a smaller office building and employee population than the proposed project. However, the No Project Alternative would not result in redevelopment of the existing structure in a way that would include updated energy efficiency standards.

Overall, the No Project Alternative would result in *slightly lessened* air quality impacts compared to the proposed project.

6.5.1.3 BIOLOGICAL RESOURCES

Impacts of the proposed project to nesting birds and impacts associated with Santa Clara Valley Water District (SCVWD) guidelines would be less than significant with mitigation; impacts to sensitive species, sensitive habitats, riparian habitats, wetlands, and habitat conservation plans would be less than significant without mitigation.

Unlike the proposed project, the No Project Alternative would not include any construction activities, and would therefore avoid the potential to affect nesting birds or create conflicts with SCVWD guidelines, which were identified as significant-but-mitigable impacts of the proposed project.

Although the project site and land to the north, west, and southwest are currently built out with urban uses, the numbers of birds flying near the project site is higher than in other urbanized areas of the city due to the adjacency of the Los Gatos Creek corridor along the eastern site boundary. Increased window area, particularly with clear glass, poses a hazard risk for flying birds; however, with implementation of Mitigation Measure BIO-4b this impact would be less than significant under the proposed project. The existing office building that would remain under the No Project Alternative would pose a similar interference with the movement of birds on the project site. The No Project Alternative would not impact sensitive species, sensitive habitats, riparian habitats, wetlands, local ordinances, or habitat conservation plans.

The No Project Alternative would cause *similar* impacts to biological resources compared to the proposed project.

6.5.1.4 CULTURAL RESOURCES

Impacts of the proposed project to paleontological resources would be less than significant with mitigation; impacts to historical resources, archaeological resources, human remains, and tribal cultural resources would be less than significant without mitigation.

The No Project Alternative would not include any construction activities and would therefore not involve ground disturbance; thus, no impact to archaeological or paleontological resources or human remains would occur. Therefore, the project's significant-but-mitigable impact to paleontological resources would be avoided. No impact to historical resources, archaeological resources, human remains, or tribal cultural resources would occur.

The No Project Alternative would cause *slightly lessened* impacts to cultural resources compared to the proposed project.

6.5.1.5 GEOLOGY, SOILS, AND SEISMICITY

Construction of the proposed project would result in less-than-significant impacts associated with seismic hazards; soil erosion; and hazards from unstable soils, including collapsible soils and expansive soils.

The No Project Alternative would not include any construction activities and would therefore not involve ground disturbance. Thus, the No Project Alternative would not cause or exacerbate impacts related to seismic hazards, erosion, or unstable soils. However, the No Project Alternative would not be required to comply with updated seismic building standards of the California Building Code that would apply to the proposed project.

Overall, neither the proposed project nor the No Project Alternative would result in significant geology, soils, or seismicity impacts. Therefore, the No Project Alternative would cause *similar* impacts when compared to the proposed project.

6.5.1.6 GREENHOUSE GAS EMISSIONS

Construction and operation of the proposed project would generate GHG emissions. However, impacts would be less than significant without mitigation.

The No Project Alternative would not involve demolition of the existing building or the construction of a new office building and parking garage. Therefore, the No Project Alternative would reduce the project's construction-related GHG emissions.

Operation of the office building under the No Project Alternative could increase usage of the project site and project-related traffic emissions in comparison to existing conditions, as the existing office building is approximately 30- percent occupied and the No Project Alternative could involve full occupancy of the office building. These operational GHG emissions would be lower than those of the proposed project, as the No Project Alternative would involve a smaller office building and employee population than the proposed project. However, the No Project Alternative would not result in redevelopment of the existing structure in a way that would include updated energy efficiency standards.

Overall, neither the proposed project nor the No Project Alternative would result in significant GHG emissions impacts; therefore, this alternative would result in *similar* GHG emissions impacts compared to the proposed project.

6.5.1.7 HAZARDS AND HAZARDOUS MATERIALS

The proposed project would cause less-than-significant impacts with mitigation respecting hazardous materials that are present or potentially present in the existing building (e.g. asbestos-containing materials [ACM] and lead-based paint [LBP]) and accidental release of hazardous materials. Impacts related to listed hazardous materials sites, airport-related hazards, emergency response plans, and wildland fires would be less than significant without mitigation.

Unlike the proposed project, the No Project Alternative would not include any construction activities and therefore would not involve the use, handling, transport, or storage of hazardous materials during construction. In addition, the No Project Alternative would not involve demolition that could expose and disturb existing hazardous materials such as ACM or LBP; therefore, the No Project Alternative would avoid the project's significant-but-mitigable impact associated with ACM and LBP.

Like the proposed project, the No Project Alternative would include operation of an office building. Therefore, it would involve the routine use, handling, storage, and transport of materials such as cleaners, fertilizers, and solvents during operation. As under the proposed project, compliance with existing laws, policies, and procedures would ensure that impacts associated with these materials during operation would be avoided.

Neither the proposed project nor the No Project Alternative would create or exacerbate hazards associated with location on a hazardous materials site, airports, emergency response plans, or wildland fires.

Overall, the No Project Alternative would result in *slightly lessened* hazards and hazardous materials impacts when compared to the proposed project.

6.5.1.8 HYDROLOGY AND WATER QUALITY

The proposed project would result in less-than-significant impacts without mitigation to water quality, groundwater, drainage, and flood hazards. Proposed project development would include construction of on-site drainage improvements (a bioretention area, four (4) flow-through planters, and two (2) storm drains) all of which are designed to reduce flood potential and improve water quality, therefore resulting in beneficial effects on storm drainage and stormwater quality.

The existing office building and parking lot were constructed in 1975, prior to implementation of the current requirements for on-site stormwater retention and pre-treatment requirements, thereby discharging the unrestricted flow of untreated stormwater to municipal stormwater system.

The No Project Alternative would not involve construction activities with the potential to generate pollutants and soil erosion. However, with compliance with applicable stormwater regulations the potential impacts of the proposed project are reduced to less than significant.

The No Project Alternative would not increase impervious areas on-site and would not impact groundwater recharge, or the rate or volume of runoff from the site. However, the No Project Alternative would not involve the project's beneficial stormwater treatment and drainage improvements.

Neither the proposed project nor the No Project Alternative would exacerbate any flood hazards.

Neither the proposed project nor the No Project Alternative would result in significant hydrology and water quality impacts. Overall, with stormwater control measures in place, the proposed project would be considered an improvement over the existing conditions that would remain under this alternative. Therefore, the No Project Alternative would result in *slightly greater* impacts when compared to the proposed project.

6.5.1.9 LAND USE AND PLANNING

The proposed project would cause less-than-significant impacts to land use and planning. The project would require a zone change from the existing C-M (controlled manufacturing) zone to P-D (Planned

Development). Upon approval of the zone change by the Campbell City Council, the proposed project would have more flexibility with regard to land use regulations for the project site.

The No Project Alternative would not involve a rezoning. It would not change the land use of the project site, but it could increase the intensity of the use of the site, as it is assumed the office building would become fully occupied. Like the proposed project, the No Project Alternative would not divide an established community, conflict with land use regulations intended to avoid environmental impacts, or conflict with a habitat conservation plan.

Overall, neither the proposed project nor the No Project Alternative would result in significant land use impacts. Therefore, the No Project Alternative would result in *similar* impacts when compared to the proposed project.

6.5.1.10 NOISE

Construction activities of the proposed project could expose people to or generate noise level in excess of standards established in the General Plan, which would be a less-than-significant impact with mitigation. Operation of the proposed project would not permanently increase ambient noise levels or cause cumulative impacts; these impacts would be less than significant without mitigation.

The project site is not located within an airport land use plan or within the vicinity of a private air strip; therefore, neither the proposed project nor the No Project Alternative would expose people to excessive aircraft noise. Since there are no buildings within 25 feet of the location of potential construction activity, the proposed project would not cause impacts related to architectural damage due to construction vibration. The No Project Alternative would not involve demolition of the existing building or the construction of a new office building and parking garage, which would eliminate the risk of demolition and construction noise. Therefore, the No Project Alternative would avoid the project's significant-but-mitigable impact.

Operation of the office building under the No Project Alternative could increase noise levels on the project site and project-related traffic noise in comparison to existing conditions, as the existing office building is approximately 30-percent occupied and the No Project Alternative could involve full occupancy of the office building. These operational noise levels would be lower than those of the proposed project, as the No Project Alternative would involve a smaller office building and employee population than the proposed project.

Overall, the No Project Alternative would result in *slightly lessened* impacts to noise compared to the proposed project.

6.5.1.11 POPULATION AND HOUSING

The proposed project would cause less-than-significant impacts to population and housing. Proposed project development would increase employment on-site, which could indirectly cause minor growth in the region. There is no housing or residents on-site, and therefore the proposed project would not displace housing or residents. The proposed project would demolish the existing office building, which

would displace current employees on-site. However, the project would result in 719 employees on-site, which would create a net increase of 613 employees on-site in employment opportunities on-site when compared to existing conditions.[2]

Under the No Project Alternative, the number of employees could increase from 106 to 318, compared to the 719 employees of the proposed project. Similar to the proposed project, this increase could indirectly cause minor growth in the region and this alternative would not displace housing or residents.

Overall, neither the proposed project nor the No Project Alternative would have significant impacts on population and housing. The No Project Alternative would result in *similar* impacts to population and housing compared to the proposed project.

6.5.1.12 PUBLIC SERVICES AND RECREATION

Because it would increase the employee population of the project site in comparison to existing conditions, the proposed project could increase demand for fire protection and police protection services to the project site. Development of the proposed project would not include any housing that would generate new students or increase the need for local school facilities. Employees of the project site may slightly increase usage of local libraries, parks, and recreational facilities. The project would not result in any significant impacts to public services and recreation.

The No Project Alternative would not redevelop the site; however, the office building could be fully occupied with 318 employees, or 401 fewer employees than under the proposed project. The No Project Alternative could increase public service demands in comparison to existing conditions but would result in lower demands than the proposed project.

Neither the proposed project nor the No Project Alternative would result in significant public services and recreation impacts. Therefore, the No Project Alternative would be *similar* to the proposed project.

6.5.1.13 TRANSPORTATION AND TRAFFIC

Development of the proposed project would conflict with applicable policies that measure the effectiveness of the circulation due to the increase in employees driving to and from the project site. The proposed project's contribution to San Tomas Expressway/SR 17 SB (southbound) Ramps would cause the intersection to operate at an unacceptable level of service (LOS) for both AM and PM peak hour trips and exceed the off-ramp's storage capacity for the westbound queue. The project would also cause SR 85 from Saratoga Avenue to Winchester Boulevard deteriorate from LOS E to F. These impacts would be significant and unavoidable.

The No Project Alternative would not redevelop the site; however, the office building could be fully occupied with 318 employees, or 401 fewer employees than under the proposed project. The reduction in employees would also reduce the traffic impacts to the intersections, freeway ramps, and roadway

[2] The existing 71,620-square-foot building is approximately 33 percent occupied. Using the same employee generation rate used for the project, it is assumed that the project site currently contains 106 employees (71,620 ÷ 3 ÷ 225 = 106).

segments compared to the proposed project. The No Project Alternative would reduce, but would not entirely avoid, the project's significant traffic impacts.

Neither the proposed project nor the No Project Alternative would impact air traffic patterns; create hazards; provide inadequate emergency access; or conflict with adopted policies regarding public transit, bicycle, or pedestrian facilities.

Due to the reduction in employees and associated reduction in the number of trips to and from the project site, the No Project Alternative would result in *slightly lessened* impacts compared to the proposed project.

6.5.1.14 UTILITIES AND SERVICE SYSTEMS

Proposed project development would cause less-than-significant impacts to water supplies, water facilities, wastewater treatment capacity, wastewater treatment requirements, landfill capacity, solid waste regulations, stormwater drainage facilities, and energy supplies and facilities. Proposed project development would include development of on-site drainage improvements (a bioretention area, four (4) flow-through planters, and two (2) storm drains), which would reduce stormwater flow during storm events, and would improve stormwater quality through the bioretention area. These improvements would have a favorable impact on site drainage.

The No Project Alternative would involve a smaller employee generation and office building and would therefore result in less water demand, wastewater generation, solid waste generation, storm drainage, and energy demands on-site than the proposed project. However, the No Project Alternative would not result in redevelopment of the existing structure in a way that would include updated energy efficiency standards.

Overall, neither the proposed project nor the No Project Alternative would have significant impacts on utilities and services systems. Therefore, the No Project Alternative would result in *similar* impacts when compared to the proposed project.

6.5.2 EXISTING ZONING ALTERNATIVE

Under the Existing Zoning Alternative, the existing office building and surface parking lot would be demolished and the site redeveloped with a project that conforms to the requirements of the current applicable C-M Zoning district. Uses applicable to the C-M Zoning district which may operate on the project site under this alternative may include small-scale assembly, manufacturing, furniture/cabinet shops, laundries/dry cleaning plants, plastics and rubber products, warehousing, wholesaling, and distribution facilities, or wireless telecommunication facilities. However, for the purpose of the Existing Zoning Alternative, the analysis focuses on the redevelopment of an office building without the Planned Development overlay sought by the proposed project. Under the Existing Zoning Alternative, the maximum building height would be 45 feet (three stories) and the maximum FAR would be 0.40. Based on the net site area of 194,121 square feet and allowable FAR of 0.40, the maximum office building square footage would be 77,648 square feet.

Professional Office uses require a parking ratio of one space per 225 square feet of floor area (345 spaces for a 77,648 square foot office building), which is 374 fewer parking spaces than the proposed alternative. The required 345 spaces could be provided by a surface parking lot combined with either subterranean parking below the office building or a two-story parking garage.

It is assumed that the office and garage buildings in this alternative would use similar architectural design and materials as the proposed project, and that the landscape plan would provide a net increase in the number of existing trees to remain on-site. This alternative would also include new trees and landscaping throughout the site.

6.5.2.1 AESTHETICS

The proposed project would result in less-than-significant aesthetics impacts. The proposed project would result in some aesthetic benefit to the project site due to the landscape plan specifying a substantial increase in the number of new trees on-site.

Similar to the proposed project, the Existing Zoning Alternative would redevelop the project site with an office building, parking, and new landscaping. Although the building footprint could potentially be smaller than under the proposed project, the applicant could retain the same footprint given the height limitation. Like the proposed project, the Existing Zoning Alternative would increase the number of new on-site trees in comparison to existing conditions. This alternative could also accommodate more on-site landscaping and open space than the proposed project depending on the amount of parking provided below the office building.

The site is not visible from any designated State scenic highway; therefore, neither the proposed project nor the Existing Zoning Alternative would impact scenic resources in a State scenic highway.

Overall, neither the proposed project nor the Existing Zoning Alternative would have significant aesthetics impacts. Aesthetics impacts of the Existing Zoning Alternative would result in *similar* impacts to aesthetics when compared to the proposed project.

6.5.2.2 AIR QUALITY

Construction of the proposed project would create impacts associated with fugitive dust and particulate matter, and associated cancer risks and non-attainment status of the SFBAAB. These impacts would be less than significant after mitigation. The proposed project would not create any significant air quality impacts associated with operation of the proposed project.

Like the proposed project, the Existing Zoning Alternative would include the demolition of the existing building. This alternative would construct a smaller office building and require less parking than the proposed project. Whereas the proposed project would construct a five-story garage that includes subterranean parking, this alternative could construct a two-story garage with no subterranean parking. Alternatively, this alternative could involve surface parking with subterranean parking under the office building. With a smaller office building and smaller garage building, this alternative would reduce construction emissions and would reduce the project's significant-but-mitigable impact.

Like the proposed project, operation of the Existing Zoning Alternative would increase operational emissions associated with project-related traffic. However, traffic-related emissions would be less than the proposed project due to the decrease in the number of vehicle trips to and from the project site. The Existing Zoning Alternative would redevelop the site with a more energy efficient building, similar to the proposed project.

Overall, the Existing Zoning Alternative would result in *slightly lessened* air quality impacts compared to the proposed project.

6.5.2.3 BIOLOGICAL RESOURCES

Impacts of the proposed project to nesting birds and impacts associated with Santa Clara Valley Water District (SCVWD) guidelines would be less than significant with mitigation; impacts to sensitive species, sensitive habitats, riparian habitats, wetlands, local ordinances, and habitat conservation plans would be less than significant without mitigation.

Similar to the proposed project, the Existing Zoning Alternative would involve development of the site with a new office building, parking, and additional landscaping. The Existing Zoning Alternative could potentially have a smaller building footprint and/or parking lot, which would accommodate more space for landscaping and open space compared to the proposed project. Like the proposed project, impacts of the Existing Zoning Alternative to nesting birds would be less than significant with mitigation, and other biological resources impacts would be less than significant. The Existing Zoning Alternative would pose a similar interference with the movement of birds on the project site.

Like the proposed project, the Existing Zoning Alternative would be required to conform to the SCVWD's *Guidelines and Standards for Land Use Near Streams*. Because the project's planting plan does not conform to SCVWD's guidance for compliance with its guidelines, this is a significant-but-mitigable impact under the proposed project. It is assumed that the Existing Zoning Alternative would include a planting plan that conforms to Design Guide 3 of the SCVWD's guidelines.

Overall, the Existing Zoning Alternative would result in *similar* biological resources impacts compared to the proposed project.

6.5.2.4 CULTURAL RESOURCES

Impacts of the proposed project to paleontological resources would be less than significant with mitigation; impacts to historical resources, archaeological resources, human remains, and tribal cultural resources would be less than significant without mitigation.

The Existing Zoning Alternative would involve development of the entire site with an office building, associated parking, and landscaping. Similar to the proposed project, impacts of the Existing Zoning Alternative to paleontological resources would be less than significant with mitigation; and impacts to historical resources, archaeological resources, human remains, and tribal cultural resources would be less than significant.

Overall, the Existing Zoning Alternative would result in *similar* cultural resources impacts compared to the proposed project.

6.5.2.5 GEOLOGY, SOILS, AND SEISMICITY

Construction of the proposed project would result in less-than-significant impacts associated with seismic hazards; erosion; and hazards from unstable soils, including collapsible soils and expansive soils.

Like the proposed project, the Existing Zoning Alternative would include grading on-site, however, impacts of the Existing Zoning Alternative to geology, soils, and seismicity would be less than significant. Like the proposed project, the Existing Zoning Alternative would not cause or exacerbate impacts related to seismic hazards, erosion, or unstable soils.

Overall, the Existing Zoning Alternative would result in *similar* impacts to geology, soils, and seismicity compared to the proposed project.

6.5.2.6 GREENHOUSE GAS EMISSIONS

Construction and operation of the proposed project would generate GHG emissions. However, impacts would be less than significant without mitigation.

Like the proposed project, the Existing Zoning Alternative would include the demolition of the existing building. This alternative would construct a smaller office building and associated parking than the proposed project. Whereas the proposed project would construct a five-story garage that includes subterranean parking, parking under this alternative could be provided by either a two-story garage or a surface parking lot and subterranean parking below the office building, as discussed in the introduction to this alternative. With a smaller office building and smaller garage building, this alternative would therefore reduce the project's construction-related GHG emissions.

Like the proposed project, operation of the Existing Zoning Alternative would increase operational GHG emissions associated with project-related traffic in comparison to existing conditions. However, traffic-related emissions would be less than the proposed project due to the decrease in the number of vehicle trips to and from the project site. The Existing Zoning Alternative would redevelop the site with a more energy efficient building, similar to the proposed project.

Overall, neither the proposed project nor the Existing Zoning Alternative would result in significant GHG emissions impacts; therefore, this alternative would result in *similar* GHG emissions impacts compared to the proposed project.

6.5.2.7 HAZARDS AND HAZARDOUS MATERIALS

The proposed project would cause less-than-significant impacts with mitigation respecting hazardous materials that are present or potentially present in the existing building (e.g. ACM and LBP) and accidental release of hazardous materials. Impacts related to listed hazardous materials sites, airport-related hazards, emergency response plans, and wildland fires would be less than significant without mitigation.

Like the proposed project, the Existing Zoning Alternative would involve demolition of the existing office building. Therefore, like the proposed project, the Existing Zoning Alternative would be expected to cause the same significant-but-mitigable impact regarding ACM and LBP.

Like the proposed project, the Existing Zoning Alternative would include construction and operation of an office building and associated parking. Therefore, it would involve the routine use, handling, storage, and transport of materials such as cleaners, fertilizers, and solvents. As under the proposed project, compliance with existing laws, policies, and procedures would ensure that impacts associated with these materials during operation would be avoided.

Neither the proposed project nor the Existing Zoning Alternative would create or exacerbate hazards associated with location on a hazardous materials site, airports, emergency response plans, and wildland fires.

Overall, impacts of the Existing Zoning Alternative would result in *similar* hazards and hazardous materials when compared to the proposed project.

6.5.2.8 HYDROLOGY AND WATER QUALITY

The proposed project would result in less-than-significant impacts without mitigation to water quality, groundwater, drainage, and flood hazards. Proposed project development would include development construction of on-site drainage improvements (a bioretention area, four (4) flow-through planters, and two (2) storm drains) all of which are designed to reduce flood potential and improve water quality, and would thus have some favorable beneficial effects on storm drainage and stormwater quality.

The Existing Zoning Alternative would include an office building with less floor area than under the proposed project, which could allow for more landscaping and pervious surfaces compared to the proposed project. Like the proposed project, the Existing Zoning Alternative would include more on-site drainage improvements than under existing conditions, which would reduce the impacts to water quality, groundwater, drainage, and flood hazards. Neither the proposed project nor the Existing Zoning Alternative would exacerbate any flood hazards.

Overall, neither the proposed project nor the Existing Zoning Alternative would have significant hydrology and water quality impacts. The Existing Zoning Alternative would result in *similar* impacts to hydrology and water quality compared to the proposed project.

6.5.2.9 LAND USE AND PLANNING

The proposed project would cause less-than-significant impacts to land use and planning. The proposed project would require a zone change from C-M to P-D. Upon approval of the zone change by the Campbell City Council, the proposed project would have more flexibility with regard to land use regulations for the project site.

The Existing Zoning Alternative would not require rezoning of the site and would be consistent with existing land use policies. This alternative would meet the building height requirement of 45 feet in

addition to complying with the maximum FAR of 0.40. Compared to the proposed project, the Existing Zoning Alternative would also be more consistent with General Plan Goal LUT-5 because, by complying with the requirements of the C-M zone, the building and layout of the site would be similar to the land use pattern of the surrounding neighborhood. Like the proposed project, the Existing Zoning Alternative would not divide an established community, conflict with land use regulations intended to avoid environmental impacts, or conflict with a habitat conservation plan.

Overall, neither the proposed project nor the Existing Zoning Alternative would have significant land use and planning impacts. The Existing Zoning Alternative would result in *similar* land use and planning impacts compared to the proposed project.

6.5.2.10 NOISE

Construction activities of the proposed project could expose people to or generate noise level in excess of standards established in the General Plan, which would be a less-than-significant impact with mitigation. Operation of the proposed project would not permanently increase ambient noise levels or cause cumulative impacts; these impacts would be less than significant without mitigation.

The project site is not located within an airport land use plan or within the vicinity of a private air strip; therefore, neither the proposed project nor the Existing Zoning Alternative would expose people to excessive aircraft noise. Since there are no buildings within 25 feet of proposed construction activity for either the proposed project or the Existing Zoning Alternative, impacts related to architectural damage due to construction vibration would be less than significant.

Like the proposed project, the Existing Zoning Alternative would include the demolition of the existing building. This alternative would construct a smaller office building and associated parking than the proposed project. Whereas the proposed project would construct a five-story garage that includes subterranean parking, this alternative could accommodate the required parking through a two-story garage with no subterranean parking or a surface parking lot without subterranean parking. With a smaller office building and smaller garage building, this alternative would therefore reduce construction noise and would reduce the project's significant-but-mitigable impact.

Like the proposed project, operation of the Existing Zoning Alternative would have the potential to create excessive noise levels, permanently increase ambient noise levels, and cause cumulative impacts. However, operational noise impacts would be less than the proposed project due to the decrease in the number of employees on-site and vehicle trips to and from the project site.

Overall, the Existing Zoning Alternative would result in *slightly lessened* impacts to noise compared to the proposed project.

6.5.2.11 POPULATION AND HOUSING

The proposed project would cause less-than-significant impacts to population and housing. The proposed project development would increase employment on-site, which could indirectly cause very minor growth in the region. There is no housing or residents on-site and therefore the proposed project would not

displace housing or residents. The proposed project would demolish the existing office building, which would displace current employees on-site. However, the project would result in 719 employees on-site, which would create a net increase of 613 employees on-site in employment opportunities on-site when compared to existing conditions.[3]

Similar to the proposed project, the Existing Zoning Alternative would not displace housing or residents and would not develop housing. Therefore, like the proposed project, the Existing Zoning Alternative would not directly cause population growth in Campbell. The Existing Zoning Alternative would generate lower employment on-site (194 to 345 employees, compared to 719 for the proposed project). Thus, this alternative would indirectly cause less growth in the region compared to the proposed project.

Overall, neither the proposed project nor the Existing Zoning Alternative would have significant population and housing impacts. The Existing Zoning Alternative would result in *similar* impacts to population and housing compared to the proposed project.

6.5.2.12 PUBLIC SERVICES AND RECREATION

Because it would increase the employee population of the project site in comparison to existing conditions, the proposed project could increase demand for fire protection and police protection services to the project site. Development of the proposed project would not include any housing that would generate new students or increase the need for local school facilities. Employees of the project site may slightly increase usage of local libraries, parks, and recreational facilities. The project would not result in any significant impacts to public services and recreation.

The Existing Zoning Alternative would redevelop the site with a new office building and associated parking; however, both would be smaller in size than under the proposed project. The Existing Zoning Alternative would have up to 345 employees, or up to 374 fewer employees than under the proposed project. The Existing Zoning Alternative would increase public service demands in comparison to existing conditions but would result in lower demands than the proposed project.

Neither the proposed project nor the Existing Zoning Alternative would result in significant public services and recreation impacts. Therefore, the Existing Zoning Alternative would be *similar* to the proposed project.

6.5.2.13 TRANSPORTATION AND TRAFFIC

Development of the proposed project would conflict with applicable policies that measure the effectiveness of the circulation due to the increase in employees driving to and from the project site. The proposed project's contribution to San Tomas Expressway/SR 17 SB Ramps would cause the intersection to operate at an unacceptable LOS for both AM and PM peak hour trips and exceed the off-ramp's storage capacity for the westbound queue. The project would also cause SR 85 from Saratoga Avenue to Winchester Boulevard deteriorate from LOS E to F. These impacts would be significant and unavoidable.

[3] The existing 71,620-square-foot building is approximately 33 percent occupied. Using the same employee generation rate used for the project, it is assumed that the project site currently contains 106 employees (71,620 ÷ 3 ÷ 225 = 106).

Similar to the proposed project, the Existing Zoning Alternative would redevelop the site with a new office building and associated parking, however both would be smaller in size. The Existing Zoning Alternative would have up to 345 employees, or up to 374 fewer employees than under the proposed project. The reduction in employees would also reduce the traffic impacts to the intersections, freeway ramps, and roadway segments compared to the proposed project. The Existing Zoning Alternative would reduce, but would not entirely avoid, the project's significant traffic impacts.

Neither the proposed project nor the Existing Zoning Alternative would impact air traffic patterns; create hazards; provide inadequate emergency access; or conflict with adopted policies regarding public transit, bicycle, or pedestrian facilities.

Due to the reduction in employees and number of trips to and from the project site, the Existing Zoning Alternative would result in *slightly lessened* impacts compared to the proposed project.

6.5.2.14 UTILITIES AND SERVICE SYSTEMS

The proposed project development would cause less-than-significant impacts to water supplies, water facilities, wastewater treatment capacity, wastewater treatment requirements, landfill capacity, solid waste regulations, stormwater drainage facilities, and energy supplies and facilities. The proposed project development would include development of on-site drainage improvements (a bioretention area, four (4) flow-through planters, and two (2) storm drains) and would thus have some favorable impact on site drainage.

Compared to the proposed project, the Existing Zoning Alternative would generate less employment on-site (up to 345 employees, compared to 719 for the proposed project), and thus would generate lower utility demands than the proposed project would. Similar to the proposed project, the Existing Zoning Alterative would involve development of on-site drainage improvements, which would have some favorable impact on storm drainage and stormwater quality. The Existing Zoning Alternative would also redevelop the site with a more energy efficient building, similar to the proposed project.

Overall, neither the proposed project nor the Existing Zoning Alternative would have significant impacts on utilities and services systems. The Existing Zoning Alternative would result in *similar* impacts when compared to the proposed project.

6.5.3 REDUCED INTENSITY ALTERNATIVE

Under the Reduced Intensity Alternative, the existing office building and surface parking lot would be demolished and the site redeveloped with an office building and surface parking at an intensity that would avoid the project's significant and unavoidable traffic impacts. Under the Reduced Intensity Alternative, the maximum building square footage would be 64,748 square feet, about 60 percent smaller than the proposed project and about 17 percent smaller than the Existing Zoning Alternative. This analysis assumes the office building would be three stories and the entire site would be redeveloped, similar to existing conditions.

Professional Office uses require a parking ratio of one space per 225 square feet of floor area (288 spaces for a 64,748 square foot office building), which is 432 fewer parking spaces than the proposed alternative. The required 288 spaces could be provided by a surface parking lot without the need for subterranean parking or a parking garage. This option would allow for more landscaping and on-site open space than the proposed project or the Existing Zoning Alternative. Under the Reduced Intensity Alternative, the project would be conditioned to preserve existing trees to the maximum extent possible while still allowing the office building to be oriented along the Dell Avenue frontage. This alternative would also include new trees and landscaping throughout the site.

6.5.3.1 AESTHETICS

The proposed project would result in less-than-significant aesthetics impacts. The proposed project would result in some aesthetic benefit to the project site due to the landscape plan specifying a substantial increase in the number of new trees on-site.

Compared to the proposed project, under the Reduced Intensity Alternative the project site would be redeveloped with a smaller office building and would require fewer parking spaces. Although the building size would be smaller than under the proposed project, the office building would be of similar architectural design and materials. Like the proposed project, the Reduced Intensity Alternative would increase the number of on-site trees in comparison to existing conditions. This alternative could create more on-site landscaping and open space on the project site than the proposed project. Eliminating the parking garage building would also reduce the visual intensity of the project.

The site is not visible from any designated State scenic highway; therefore, neither the proposed project nor the Reduced Intensity Alternative would impact scenic resources in a State scenic highway.

Overall, neither the proposed project nor the Reduced Intensity Alternative would have significant aesthetics impacts. Aesthetics impacts of the Reduced Intensity Alternative would result in *similar* impacts to aesthetics when compared to the proposed project.

6.5.3.2 AIR QUALITY

Construction of the proposed project would create impacts associated with fugitive dust and particulate matter, and associated cancer risks and non-attainment status of the SFBAAB. These impacts would be less than significant after mitigation. The proposed project would not create any significant air quality impacts associated with operation of the proposed project.

Like the proposed project, the Reduced Intensity Alternative would include the demolition of the existing building. This alternative would construct a smaller office building and require fewer parking spaces than the proposed project. This alternative would therefore reduce construction emissions and would reduce the project's significant-but-mitigable impact.

Like the proposed project, operation of the Reduced Intensity Alternative would increase operational emissions associated with project-related traffic. However, traffic-related emissions would be less than the proposed project due to the decrease in the number of vehicle trips to and from the project site. The

Reduced Intensity Alternative would redevelop the site with a more energy efficient building, similar to the proposed project.

Overall, the Reduced Intensity Alternative would result in *slightly lessened* air quality impacts compared to the proposed project.

6.5.3.3 BIOLOGICAL RESOURCES

Impacts of the proposed project to nesting birds and impacts associated with Santa Clara Valley Water District (SCVWD) guidelines would be less than significant with mitigation; impacts to sensitive species, sensitive habitats, riparian habitats, wetlands, local ordinances, and habitat conservation plans would be less than significant without mitigation.

The Reduced Intensity Alternative would involve development of the site with a smaller building and reduced parking, allowing more space for landscaping and open space compared to the proposed project. Under this alternative, the office building would be conditioned to preserve existing trees to the maximum extent possible. While this alternative would involve some tree removal, it would reduce the extent of the proposed project's significant-but-mitigable impact to nesting birds. The Reduced Intensity Alternative would pose a similar interference with the movement of birds on the project site. As under the proposed project, other biological resources impacts would be less than significant.

Like the proposed project, the Reduced Intensity Alternative would be required to conform to the SCVWD's *Guidelines and Standards for Land Use Near Streams*. Because the project's planting plan does not conform to SCVWD's guidance for compliance with its guidelines, this is a significant-but-mitigable impact under the proposed project. It is assumed that the Reduced Intensity Alternative would include a planting plan that conforms to Design Guide 3 of the SCVWD's guidelines.

Overall, the Reduced Intensity Alternative would result in *similar* biological resources impacts when compared to the proposed project.

6.5.3.4 CULTURAL RESOURCES

Impacts of the proposed project to paleontological resources would be less than significant with mitigation; impacts to historical resources, archaeological resources, human remains, and tribal cultural resources would be less than significant without mitigation.

The Reduced Intensity Alternative would involve development of the entire site with a 64,748-square-foot office building, associated parking, and landscaping. Similar to the proposed project, impacts of the Reduced Intensity Alternative to paleontological resources would be less than significant with mitigation; and impacts to historical resources, archaeological resources, human remains, and tribal cultural resources would be less than significant.

Overall, the Reduced Intensity Alternative would result in *similar* cultural resources impacts compared to the proposed project.

6.5.3.5 GEOLOGY, SOILS, AND SEISMICITY

Construction of the proposed project would result in less-than-significant impacts associated with seismic hazards; erosion; and hazards from unstable soils, including collapsible soils and expansive soils.

Like the proposed project, the Reduced Intensity Alternative would include grading on-site, however, impacts of the Reduced Intensity Alternative to geology, soils, and seismicity would be less than significant. Like the proposed project, the Reduced Intensity Alternative would not cause or exacerbate impacts related to seismic hazards, erosion, or unstable soils.

Overall, the Reduced Intensity Alternative would result in *similar* impacts to geology, soils, and seismicity compared to the proposed project.

6.5.3.6 GREENHOUSE GAS EMISSIONS

Construction and operation of the proposed project would generate GHG emissions. However, impacts would be less than significant without mitigation.

Like the proposed project, the Reduced Intensity Alternative would include the demolition of the existing building. This alternative would construct a smaller office building and fewer parking spaces than the proposed project and would therefore reduce the project's construction-related GHG emissions.

Like the proposed project, operation of the Reduced Intensity Alternative would increase operational GHG emissions associated with project-related traffic in comparison to existing conditions. However, traffic-related GHG emissions would be less than the proposed project due to the decrease in the number of vehicle trips to and from the project site. The Reduced Intensity Alternative would redevelop the site with a more energy efficient building, similar to the proposed project.

Overall, neither the proposed project nor the Reduced Intensity Alternative would result in significant GHG emissions impacts; therefore, this alternative would result in *similar* GHG emissions impacts compared to the proposed project.

6.5.3.7 HAZARDS AND HAZARDOUS MATERIALS

The proposed project would cause less-than-significant impacts with mitigation respecting hazardous materials that are present or potentially present in the existing building (e.g. ACM and LBP) and accidental release of hazardous materials. Impacts related to listed hazardous materials sites, airport-related hazards, emergency response plans, and wildland fires would be less than significant without mitigation.

Like the proposed project, the Reduced Intensity Alternative would involve demolition of the existing office building. Therefore, like the proposed project, the Reduced Intensity Alternative would be expected to cause the same significant-but-mitigable impact regarding ACM and LBP.

Like the proposed project, the Reduced Intensity Alternative would include construction and operation of an office building and associated parking. Therefore, it would involve the routine use, handling, storage, and transport of materials such as cleaners, fertilizers, and solvents. As under the proposed project,

compliance with existing laws, policies, and procedures would ensure that impacts associated with these materials during operation would be avoided.

Neither the proposed project nor the Reduced Intensity Alternative would create or exacerbate hazards associated with location on a hazardous materials site, airports, emergency response plans, and wildland fires.

Overall, impacts of the Reduced Intensity Alternative would result in *similar* hazards and hazardous materials when compared to the proposed project.

6.5.3.8 HYDROLOGY AND WATER QUALITY

The proposed project would result in less-than-significant impacts without mitigation to water quality, groundwater, drainage, and flood hazards. The proposed project development would include development construction of on-site drainage improvements (a bioretention area, four (4) flow-through planters, and two (2) storm drains) all of which are designed to reduce flood potential and improve water quality, therefore resulting in and would thus have some favorable beneficial effects on storm drainage and stormwater quality.

The Reduced Intensity Alternative would include a smaller office building than under the proposed project, which would allow for more landscaping and pervious surfaces compared to the proposed project. Like the proposed project, the Reduced Intensity Alternative would include more on-site drainage improvements than under existing conditions, which would reduce the impacts to water quality, groundwater, drainage, and flood hazards. Neither the proposed project nor the Reduced Intensity Alternative would exacerbate any flood hazards.

Overall, neither the proposed project nor the Reduced Intensity Alternative would have significant hydrology and water quality impacts. The Reduced Intensity Alternative would result in *similar* impacts to hydrology and water quality compared to the proposed project.

6.5.3.9 LAND USE AND PLANNING

The proposed project would cause less-than-significant impacts to land use and planning. The proposed project would require a zone change from C-M to P-D. Under the requested zone change, the Campbell City Council could approve the proposed project with more flexible development standards than the C-M zoning.

The Reduced Intensity Alternative would not require rezoning of the site and would be consistent with existing land use policies. This alternative would meet the building height requirement of 45 feet for both the office building and parking garage, in addition to complying with the maximum FAR of 0.40. Like the proposed project, the Reduced Intensity Alternative would not divide an established community, conflict with land use regulations intended to avoid environmental impacts, or conflict with a habitat conservation plan.

Overall, neither the proposed project nor the Reduced Intensity Alternative would have significant land use and planning impacts. The Reduced Intensity Alternative would result in *similar* land use and planning impacts compared to the proposed project.

6.5.3.10 NOISE

Construction activities of the proposed project could expose people to or generate noise level in excess of standards established in the General Plan, which would be a less-than-significant impact with mitigation. Operation of the proposed project would not permanently increase ambient noise levels or cause cumulative impacts; these impacts would be less than significant without mitigation.

The project site is not located within an airport land use plan or within the vicinity of a private air strip; therefore, neither the proposed project nor the Reduced Intensity Alternative would expose people to excessive aircraft noise. Since there are no buildings within 25 feet of proposed construction activity for either the proposed project or the Reduced Intensity Alternative, impacts related to architectural damage due to construction vibration would be less than significant.

Like the proposed project, the Reduced Intensity Alternative would include the demolition of the existing building. This alternative would construct a smaller office building and fewer parking spaces than the proposed project. Whereas the proposed project would construct a five-story garage that includes subterranean parking, this alternative could be constructed without a parking garage building, which would reduce construction noise and reduce the project's significant-but-mitigable impact.

Like the proposed project, operation of the Reduced Intensity Alternative would have the potential to create excessive noise levels, permanently increase ambient noise levels, and cause cumulative impacts. However, operational noise levels would be less than the proposed project due to the decrease in the number of employees on-site and vehicle trips to and from the project site.

Overall, the Reduced Intensity Alternative would result in *slightly lessened* impacts to noise compared to the proposed project.

6.5.3.11 POPULATION AND HOUSING

The proposed project would cause less-than-significant impacts to population and housing. Proposed project development would increase employment on-site, which could indirectly cause very minor growth in the region. There is no housing or residents on-site, and therefore proposed project development would not displace housing or residents. The proposed project would demolish the existing office building, which would displace current employees on-site. However, the proposed project would result in 719 employees on-site, a net increase of 613 employees when compared to existing conditions.[4]

Similar to the proposed project, the Reduced Intensity Alternative would not displace housing or residents; would not develop housing; and would not directly cause population growth in Campbell. The

[4] The existing 71,620-square-foot building is approximately 33 percent occupied. Using the same employee generation rate used for the project, it is assumed that the project site currently contains 106 employees (71,620 ÷ 3 ÷ 225 = 106).

Reduced Intensity Alternative would generate lower employment on-site compared to the proposed project (288 employees, compared to 719 for the proposed project). Therefore, this alternative would indirectly cause less growth in the region than the proposed project would.

Overall, neither the proposed project nor the Reduced Intensity Alternative would have significant population and housing impacts. The Reduced Intensity Alternative would result in *similar* impacts on population and housing compared to the proposed project.

6.5.3.12 PUBLIC SERVICES AND RECREATION

Because it would increase the employee population of the project site in comparison to existing conditions, the proposed project could increase demand for fire protection and police protection services to the project site. Development of the proposed project would not include any housing that would generate new students or increase the need for local school facilities. Employees of the project site may slightly increase usage of local libraries, parks, and recreational facilities. The project would not result in any significant impacts to public services and recreation.

The Reduced Intensity Alternative would redevelop the site with a smaller office building and reduced parking for approximately 288 employees, or 431 fewer employees than under the proposed project. The Reduced Intensity Alternative would increase public service demands in comparison to existing conditions but would result in lower demands than the proposed project.

Neither the proposed project nor the Reduced Intensity Alternative would result in significant public services and recreation impacts. Therefore, the Reduced Intensity Alternative would be *similar* to the proposed project.

6.5.3.13 TRANSPORTATION AND TRAFFIC

Development of the proposed project would conflict with applicable policies that measure the effectiveness of the circulation due to the increase in employees driving to and from the project site. The proposed project's contribution to San Tomas Expressway/SR 17 SB Ramps would cause the intersection to operate at an unacceptable LOS for both AM and PM peak hour trips and exceed the off-ramp's storage capacity for the westbound queue. The project would also cause SR 85 from Saratoga Avenue to Winchester Boulevard deteriorate from LOS E to F. These impacts would be significant and unavoidable.

Similar to the proposed project, the Reduced Intensity Alternative would redevelop the site with a smaller office building and fewer parking spaces. The Reduced Intensity Alternative would have approximately 288 employees, or 431 fewer employees than under the proposed project. The reduction in employees would reduce the traffic impacts to the intersections, freeway ramps, and roadway segments compared to the proposed project. The Reduced Intensity Alternative would reduce project trips at a level sufficient to avoid the project's significant and unavoidable traffic impacts.

Neither the proposed project nor the Reduced Intensity Alternative would impact air traffic patterns; create hazards; provide inadequate emergency access; or conflict with adopted policies regarding public transit, bicycle, or pedestrian facilities.

Due to the reduction in employees and number of trips to and from the project site, the Reduced Intensity Alternative would result in *substantially lessened* impacts compared to the proposed project.

6.5.3.14 UTILITIES AND SERVICE SYSTEMS

Proposed project development would cause less-than-significant impacts to water supplies, water facilities, wastewater treatment capacity, wastewater treatment requirements, landfill capacity, solid waste regulations, stormwater drainage facilities, and energy supplies and facilities. Proposed project development would include development of on-site drainage improvements (a bioretention area, four (4) flow-through planters, and two (2) storm drains) and would thus have some favorable impact on site drainage.

Compared to the proposed project, the Reduced Intensity Alternative would generate less employment on-site (288 employees, compared to 719 for the proposed project), and thus would generate lower utility demands than the proposed project would. Similar to the proposed project, the Reduced Intensity Alterative would involve development of on-site drainage improvements, which would have some favorable impact on storm drainage and stormwater quality. The Reduced Intensity Alternative would also redevelop the site with a more energy efficient building, similar to the proposed project.

Overall, neither the proposed project nor the Reduced Intensity Alternative would have significant impacts on utilities and services systems. The Reduced Intensity Alternative would result in *similar* utilities and service systems impacts compared to the proposed project.

6.6 OBJECTIVES ASSESSMENT

The project applicant has developed the following project objectives:

- Create a high-quality, regionally significant office development/technology campus that can compete with other cities and counties in Silicon Valley to attract high tech, med tech/modern medical, or other innovative businesses.
- Enhance the project site with quality work spaces, adequate parking, and outdoor space.
- Attract a workforce population that supports local businesses.
- Revitalize the project site in a socially vibrant and economically viable manner that reflects the project site's position as a gateway to the city.
- Create an employment center that maximizes the project site's development potential.
- Promote the project site's proximity to the Los Gatos Creek pedestrian and bicycle trail and the proposed Santa Clara Valley Transportation Authority's Light Rail station at Hacienda and Winchester Boulevard, as a means to minimize the reliance of the anticipated workforce automobile travel, which in turn has the effect of limiting traffic congestion, vehicle miles traveled, and associated emissions.

6.6.1 NO PROJECT ALTERNATIVE

The No Project Alternative would not meet most of the project objectives. It would not create a new, high-quality, regionally significant office development that can attract high tech, med tech/modern medical, or other innovative businesses to a site near a City gateway. This alternative would not enhance the project site to function as a campus environment, but would provide quality work spaces, adequate parking, and outdoor space. If the existing building is fully occupied, it may attract a workforce population and create an employment center to maximize the project site's development potential. Due to the project's location, the No Project Alternative would still provide an employment center in close proximity to the Los Gatos Creek and the proposed light rail station; however, this alternative would not maximize the occupancy of the site. Overall, the No Project Alternative would maintain on-site office opportunities, but would not create a new and innovative office campus; it would therefore meet some, but not all, of the project objectives.

6.6.2 EXISTING ZONING ALTERNATIVE

The Existing Zoning Alternative would meet most of the objectives for the proposed project, but would not maximize the occupancy of the site. Employment on-site in this alternative is estimated at up to 345, which is about half of the proposed project's employment population of 719 employees. The Existing Zoning Alternative would revitalize the site to enhance the gateway to the city, create high-quality and regionally significant work spaces, attract a workforce population to a campus-like office complex, and minimize the reliance on vehicles due to the close proximity to the Los Gatos Creek Trail. Overall, this alternative would create a new and innovative employment center, without maximizing the occupancy of the site.

6.6.3 REDUCED INTENSITY ALTERNATIVE

The Reduced Intensity Alternative would meet most of the objectives for the proposed project, but would not maximize the occupancy of the site due to reduced employment and an FAR to 0.33. Employment on-site in this alternative is estimated at 288, less than half of that of the proposed project's employment population of 719 employees. This alternative would, however, revitalize the project site to create a regionally significant office development, quality work spaces that function as a campus environment, an employment center that will maintain balance between jobs and housing, and minimize reliance of vehicle travel due to the close proximity to the Los Gatos Creek Trail.

6.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. In addition to the discussion and comparison of impacts of the project 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. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the project applicant or Campbell.

ALTERNATIVES TO THE PROPOSED PROJECT

As shown in Table 6-2, the Reduced Intensity Alternative would, in comparison to the project, result in fewer impacts when compared to those of the proposed project for the topics of air quality, noise, and transportation and traffic. The Reduced Intensity Alternative would meet most of the project objectives but would not generate as many employment opportunities on the project site as the proposed project or maximize the project site's development potential. Regardless, the Reduced Intensity Alterative is considered the environmentally superior alternative.

7. CEQA-Mandated Sections

This chapter provides an overview of the impacts of the proposed project based on the analyses presented in Chapters 4 through 6 of this Draft Environmental Impact Report (EIR). The topics covered in this chapter include impacts found not to be significant, not to have significant irreversible changes, and not to induce growth. A more detailed analysis of the effects the proposed project would have on the environment and the proposed mitigation measures to minimize significant impacts is provided in Chapters 4.1 through 4.14.

7.1 IMPACTS FOUND NOT TO BE SIGNIFICANT

The California Environmental Quality Act (CEQA) Guidelines Section 15128 allows environmental issues for which there is no likelihood of significant impact to be "scoped out" and not analyzed further in the EIR. This section explains the reasoning by which it was determined that impacts to agriculture and forestry resources and to mineral resources that could potentially result from buildout of the proposed project would be less than significant.

7.1.1 AGRICULTURE AND FORESTRY RESOURCES

The proposed project is designated as Research and Development on the City's General Plan Land Use Map. The General Plan, General Plan land use map, and zoning map do not identify any agriculture or forestry resources within the city. In addition, the Farmland Mapping and Monitoring Program of the California Resources Agency does not identify lands within Campbell as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[1] Furthermore, there are no areas of forestland or forest and rangeland identified within the city.[2] There are no Williamson Act contracts in effect on land in the city.[3] Therefore, construction of the proposed project would have no impact on agriculture, forestland, or forestry resources.

[1] California Resources Agency, Santa Clara County Important Farmland 2014 map, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/scl14.pdf, accessed August 20, 2018.

[2] California Department of Forestry and Fire Protection, Land Cover Map 2006, http://frap.fire.ca.gov/data/frapgismaps/pdfs/fvegwhr13b_map.pdf, accessed August 20, 2018.

[3] Williamson Act contracts restrict the use of privately-owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. See: Division of Land Resource Protection, 2016, Santa Clara County Williamson Act FY 2015/2016, ftp://ftp.consrv.ca.gov/pub/dlrp/wa/SantaClara_15_16_WA.pdf, accessed November 12, 2018.

7.1.2 MINERAL RESOURCES

The California Department of Conservation, Geological Survey (CGS) has classified lands within Santa Clara County into Aggregate and Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1974. These MRZs identify whether known or inferred significant mineral resources are present in areas. The mineral resources include Portland cement concrete, asphaltic cement, and base aggregate resources. Lead agencies are required to incorporate identified MRZs resource areas delineated by the State into their General Plans.[4] There are no known mineral resources in the City of Campbell; therefore, the proposed project does not include any significant known or inferred mineral resources. Given this, construction of the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State or the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan and this issue has therefore not been analyzed further in this Draft EIR.

7.2 SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(c) of the CEQA Guidelines requires an EIR to discuss the extent to which a proposed project or plan 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.

7.2.1 LAND USE CHANGES THAT COMMIT FUTURE GENERATIONS

As described in Chapter 3, Project Description, the proposed project proposes to demolish the existing buildings on the site and remove eight (8) existing trees. The proposed project also involves the redevelopment of the site with a 161,870-square-foot four-story office building, a 146,478-square-foot five-story parking garage (plus underground parking), additional surface parking, and a 9,511-square-foot on-site public open space area. Because the project site is already developed and is located in an urban area with existing office use, the proposed project is not expected to result in any land use changes that would commit future generations to uses that are not already prevalent in the project site vicinity.

7.2.2 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 of the proposed project 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 use proposed by the proposed

[4] Public Resources Code Section 2762(a)(1).

project 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 project would not pose a substantial risk of environmental accidents.

7.2.3 LARGE COMMITMENT OF NON-RENEWABLE RESOURCES

Consumption of nonrenewable resources includes issues related to increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. The proposed project would require water, electric, and gas service, as well as additional resources for construction. Additionally, the ongoing operation of the proposed project would involve the use of nonrenewable resources. Construction and ongoing maintenance of the proposed project 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, as well as utilities. During the operational phase of the proposed project (post-construction), energy sources including oil and gasoline would be used for lighting, heating, and cooling of the office use, as well as transportation of people to and from the project site.

However, the proposed project would include several features that would offset or reduce the need for nonrenewable resources. The proposed project would be required to comply with all applicable building and design requirements, including those set forth in California Code of Regulations Title 24 relating to energy conservation. In compliance with CALGreen, the State's Green Building Standards Code, the proposed project would be required to reduce water consumption by 20 percent, divert 50 percent of construction waste from landfills, and install low pollutant-emitting materials. In addition, buildings that are constructed in accordance with the 2016 Building and Energy Efficiency Standards (Title 24, Part 6) are 28 percent (residential) to 5 percent (non-residential) more energy efficient than those constructed under the prior 2013 standards as a result of better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses. The proposed project would also apply environmentally sustainable standards for demolition, construction, and operation. The Building and Energy Efficiency Standards (Title 24, Part 6) are required to be updated on a three-year cycle. The 2016 Standards are currently in effect; however, depending on when building permits for the proposed project are submitted, the project, if approved, may be required to conform to the 2019 Standards, which will take effect on January 1, 2020.

Although the construction and ongoing operation of the proposed project would involve the use of nonrenewable resources, through the inclusion of energy-conserving project features and compliance with applicable standards and regulations, the proposed project would not represent a large commitment of nonrenewable resources.

7.3 GROWTH-INDUCING IMPACTS OF THE PROPOSED PROJECT

Section 15126.2(d) of the CEQA Guidelines requires that an EIR discuss the ways in which a proposed project or plan 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 be 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 projects 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 projected growth would cause adverse environmental impacts.

Growth-inducing impacts fall into two general categories: direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped area. Indirect, or secondary growth-inducing impacts consist of growth-induced in the region by additional demands for housing, goods, and services associated with the population increase caused by, or attracted to, a new project.

The City of Campbell is located in an urbanized portion of Santa Clara County, well served by existing roadway and utility infrastructure. Construction of the proposed project is projected to result in 161,870 square feet of office space, and 719 jobs.[5] The unemployment rate in Santa Clara County in September 2018 was 2.4 percent;[6] thus, it is estimated that a substantial fraction of project-generated employment would be absorbed by the regional labor force, and that project employment would not attract considerable numbers of workers into the region. The extension of utility infrastructure and the construction of new roadways would not be required. As such, construction of the proposed project would not directly induce a substantial amount of growth. However, the project would contribute to the need for a widened off-ramp from southbound Highway 17 onto San Tomas Expressway (see Impacts TRANS-1a and TRANS-1b). In addition, it is possible that the project could stimulate increased interest in the Dell Avenue corridor as a neighborhood for redevelopment. However, it would be speculative to try to determine the extent to which new development along the Dell Avenue corridor may occur in the future, and therefore the potential indirect growth that could be induced by the project cannot be quantified. Any future development along the Dell Avenue corridor would be considered a separate project under CEQA and would undergo its own environmental review under CEQA. Overall, the proposed project would not be considered to have substantial adverse growth-inducing impacts.

[5] Project net employment generation is estimated using the employment density factor of 225 gross square feet per employee.

[6] Employment Development Department, 2018, Labor Force and Unemployment Rate for California Counties, http://www.labormarketinfo.edd.ca.gov/file/lfmonth/allsubs.xls, accessed November 12, 2018.

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