



FINAL

ENVIRONMENTAL IMPACT REPORT

FOR THE

ENVISION CAMPBELL GENERAL PLAN AND HOUSING ELEMENT UPDATE (SCH: 2022030566)

MARCH 2023

Prepared for:

City of Campbell
City Hall 70 N. First St.
Campbell, CA 95008

Prepared by:

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El Dorado Hills, CA 95762

D e N o v o P l a n n i n g G r o u p

A Land Use Planning, Design, and Environmental Firm



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FINAL EIR

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INTRODUCTION

The City of Campbell (City) has determined that a program-level environmental impact report (EIR) is required for the proposed General Plan (General Plan, or project) pursuant to the requirements of the California Environmental Quality Act (CEQA). CEQA requires the preparation of an EIR prior to approving any project, which may have a significant impact on the environment. For the purposes of CEQA, the term "Project" refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]).

A Program EIR is an EIR which examines the environmental impacts of an agency plan, policy, or regulatory program, such as a general plan update. Program EIRs analyze broad environmental impacts of the program, with the acknowledgement that site-specific environmental review may be required for particular aspects of the program, or particular development projects that may occur in the future.

The City of Campbell circulated a Notice of Preparation (NOP) of an EIR for the proposed Project on March 23, 2022 to trustee and responsible agencies, the State Clearinghouse, and the public. A scoping meeting was held on April 12, 2022 at the City of Campbell City Hall. Public comments on the NOP related to the EIR were presented or submitted during the scoping meeting. During the 30-day public review period for the NOP, which ended on April 25, 2022, nine written comment letters were received on the NOP. A summary of the NOP commenters is provided later in this chapter. The NOP and all comments received on the NOP are presented in Appendix A of the DEIR.

Campbell published a public Notice of Availability (NOA) for the Draft EIR on September 12, 2022, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH# 2022030566) and was published in the Santa Clara County Clerk's office and the Metro Silicon Valley Newspaper, pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review from September 12, 2022, through October 28, 2022. The Public Draft General Plan and Housing Element were also available for public review and comment during this time period.

This Final EIR was prepared to address comments received in response to the Draft EIR. The City has prepared a written response to the Draft EIR comments, and made changes to the Draft EIR where warranted. The responses to the comments are provided in this Final EIR in Section 2.0, and all changes to the text of the Draft EIR are summarized in Section 3.0. Responses to comments received during the comment period for the Draft EIR do not involve any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

PROJECT DESCRIPTION

The General Plan, which includes the updated Housing Element, is the overarching policy document that guides land use, housing, transportation, open space, public safety, community services, and other policy decisions throughout Campbell. The Campbell General Plan includes all of the State-mandated elements, as well as optional elements and issue areas, including Community Design, Public Facilities, Economic and Fiscal Sustainability, Community Health and Wellness, and Sustainability.

The General Plan sets out the goals, policies, and actions in each of these areas, serves as a policy guide for how the City will make key planning decisions in the future, and guides how the City will interact with Santa Clara County, surrounding cities, and other local, regional, State, and Federal agencies.

As part of the General Plan Update, the City and the consultant team prepared several support documents including the Existing Conditions Report, Land Use Alternatives Report and Outreach Reports that serve as the building blocks for the General Plan and analyze the environmental impacts associated with implementing the General Plan.

Refer to DEIR Chapter 2.0 (Project Description) of the Draft EIR for a more comprehensive description of the details of the proposed Project, and Chapter 1.0 (Introduction) of the DEIR for further information related to reports prepared throughout the update process.

ALTERNATIVES TO THE PROPOSED PROJECT

Section 15126.6 of the CEQA Guidelines requires an EIR to describe a reasonable range of alternatives to the Project or to the location of the Project which would reduce or avoid significant impacts, and which could feasibly accomplish the basic objectives of the proposed Project. The alternatives analyzed in this EIR are briefly described as follows:

- **Alternative 1: No Project Alternative.** Under Alternative 1, the City would not adopt the General Plan Update. The existing Campbell General Plan would continue to be implemented and no changes to the General Plan, including the Land Use Map, Circulation Diagram, goals, policies, or actions would occur. Subsequent projects, such as amending the Municipal Code (including the zoning map), would not occur. The Existing General Plan Land Use Map is shown on Figure 5.0-1.
- **Alternative 2: Modified Project Alternative.** Under Alternative 2, the City would adopt the updated General Plan policy document, but would retain the existing land use map. This alternative would result in the same growth as the existing General Plan Alternative 1, but would implement the updated goals, policies, and actions found in the General Plan Update. This Alternative would result in less residential growth than the proposed Project or Alternative 3.

- **Alternative 3: Corridor Enhancements:** Alternative 3 is a residential and employment growth-oriented option, which identifies the Bascom and Hamilton corridors for mixed use development, revitalization, and appropriate transitions from the more intense urban development densities located adjacent to Campbell in the City of San Jose. This alternative also promotes and encourages additional high tech and office uses within the Research and Development land use designation. This alternative would allow for more residential and employment growth than the existing General Plan and Alternative 2. Figure 5.0-2 depicts the Land Use Map proposed for Alternative 3. This alternative was developed as part of the City's review of potential growth strategies and land use changes during development of the Preferred Land Use Map.

Alternatives are described in detail in Section 5.0 of the Draft EIR. As summarized in Chapter 5.0 of the Draft EIR, the proposed Project is the environmentally superior alternative when looked at in terms of the potential to reduce significant environmental impacts identified throughout this EIR. All of the alternatives fail to reduce any significant and unavoidable impacts to a less than significant level. Throughout the preparation of the General Plan Update, the City Council, Planning Commission, and GPAC all expressed a desire and commitment to ensuring that the General Plan not only reflect the community's values and priorities, but also serve as a self-mitigating document and avoid significant environmental impacts to the greatest extent feasible. To that end, the proposed General Plan includes the full range of feasible minimization policies and actions to reduce potential impacts to the greatest extent possible.

COMMENTS RECEIVED

The Draft EIR addresses environmental impacts associated with the proposed Project that were known to the City, raised during the Notice of Preparation (NOP) process, or raised during preparation of the Draft EIR. The Draft EIR discusses potentially significant impacts associated with aesthetics, agriculture and forest resources, air quality, biological resources, cultural and tribal cultural resources, geology, greenhouse gas emissions and energy, hazards and hazardous materials, hydrology and water quality, land use planning and population/housing, mineral resources, noise, public services and recreation, transportation, utilities and service systems, wildfire, and cumulative impacts.

NOP Comments

The City received 9 written comment letters on the NOP. Additionally, oral comments were also received during the Public Scoping Meeting held on April 12, 2022. Copies of these letters are provided in Appendix A of this Draft EIR and the comments are briefly summarized below.

- Native American Heritage Commission: The Native American Heritage Commission provided direction regarding tribal consultation in accordance with Assembly Bill 52 and Senate Bill 18.

- Santa Clara Valley Audubon Society: The Audubon Society suggested information related to bird safe design and light pollution impacts.
- California Department of Fish and Wildlife (CDFW): The CDFW offers comments and recommendations to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.
- Office of Planning & Environmental Analysis Department of Toxic Substances Control: DTSC recommends that the following issues be evaluated: hazardous wastes/substances, contaminated soils, and demolition surveys.
- California Department of Transportation (Caltrans): Caltrans suggested information to include in the EIR traffic study and provided input with respect to content of the General Plan related to Travel Demand Analysis planning, Transportation Impact Fees, and equitable access.
- Valley Transportation Authority (VTA): VTA provided comments related to the reduction of Vehicle Miles Traveled, Transportation Network Assumptions, and equity planning.
- Sierra Club Loma Prieta Chapter: The Sierra Club provided comments related to Biotechnology developments and siting issues in shoreline areas identified as flood zones, and sea levels rise and 100-year flood events, which can create vulnerabilities for the Bay ecology.
- Valley Water: Valley Water Provided comments related to water supplies, groundwater recharge, storm water quality, and the future coordination to ensure that there are adequate water supplies to serve proposed and future development
- Planning Commission (PC) Scoping Meeting Notes: comments offered during the public scoping meeting included topics related to: water resources, fire, GHG, noise, air quality, traffic, public services and utilities, biological resources, and lighting standards.
- Nancy Tepperman: The commenter is concerned about maintaining community character and roadway safety. This commenter also noted that additional allowed development would necessitate the need for more parks, and current development has pressured existing parks within the city.

Draft EIR Comments

During the Draft EIR review process, the City received comments from the following public agencies, organizations, or individuals:

- Valley Water
- California Department of Fish and Wildlife (CDFW)
- Santa Clara County Fire Department (SCCFD).
- Tim Pasquinelli (Consigliare - Campbell Technology Pk LLC)
- Vikki Essert
- Julie Schaer, WVCWA and Vishakha Atre, SCVURPPP
- Liz Gibbons
- Stacie Wolny

Acting as lead agency, the City of Campbell has prepared a response to the Draft EIR comments. The responses to the comments are provided in this Final EIR in Section 2.0 (Comments on Draft EIR and Responses) and all changes to the content of the Draft EIR are summarized in Section 3.0 (Errata).

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This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (Section 15132). The City of Campbell is the lead agency for the environmental review of the Campbell General Plan and Housing Element Update (General Plan, General Plan Update, Envision Campbell, or Project) and has the principal responsibility for approving the Project. This FEIR assesses the expected environmental impacts resulting from approval and adoption of the Campbell General Plan and responds to comments received on the Draft EIR.

The Campbell General Plan Update is the overarching policy document that guides land use, housing, transportation, open space, public safety, community services, and other policy decisions throughout Campbell. The General Plan includes the seven elements mandated by State law, to the extent that they are relevant locally, including: Circulation, Conservation, Housing, Land Use, Noise, Open Space, and Safety. The City may also address other topics of interest. The Campbell General Plan includes all of the State-mandated elements, as well as optional elements and issue areas, including Community Design, Public Facilities, Economic and Fiscal Sustainability, Community Health and Wellness, and Sustainability.

The General Plan sets out the goals, policies, and actions in each of these areas, serves as a policy guide for how the City will make key planning decisions in the future, and guides how the City will interact with Santa Clara County, surrounding cities, and other local, regional, State, and Federal agencies.

As part of the General Plan Update, the City and the consultant team prepared several support documents including the Existing Conditions Report, Land Use Alternatives Report and Outreach Reports that serve as the building blocks for the General Plan and analyze the environmental impacts associated with implementing the General Plan.

Refer to DEIR Chapter 2.0 (Project Description) of the Draft EIR for a more comprehensive description of the details of the proposed Project, and Chapter 1.0 (Introduction) of the DEIR for further information related to reports prepared throughout the update process.

1.1 PURPOSE AND INTENDED USES OF THE EIR

CEQA REQUIREMENTS FOR A FINAL EIR

This FEIR for the Campbell General Plan has been prepared in accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines. State CEQA Guidelines Section 15132 requires that an FEIR consist of the following:

- the Draft Environmental Impact Report (Draft EIR) or a revision of the draft;
- comments and recommendations received on the Draft EIR, either verbatim or in summary;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the lead agency to significant environmental concerns raised in the review and consultation process; and
- any other information added by the lead agency.

1.0 INTRODUCTION

In accordance with State CEQA Guidelines Section 15132(a), the Draft EIR is incorporated by reference into this Final EIR.

An EIR must disclose the expected environmental impacts, including impacts that cannot be avoided, growth-inducing effects, impacts found not to be significant, and significant cumulative impacts, as well as identify mitigation measures and alternatives to the proposed Project that could reduce or avoid its adverse environmental impacts. CEQA requires government agencies to consider and, where feasible, minimize environmental impacts of proposed Projects, and obligates them to balance a variety of public objectives, including economic, environmental, and social factors.

PURPOSE AND USE

The City of Campbell, as the lead agency, has prepared this Final EIR to provide the public and responsible and trustee agencies with an objective analysis of the potential environmental impacts resulting from approval and implementation of the General Plan. Responsible and trustee agencies that may use the EIR are identified in Chapter 1.0 of the Draft EIR.

The environmental review process enables interested parties to evaluate the proposed Project in terms of its environmental consequences, to examine and recommend methods to eliminate or reduce potential adverse impacts, and to consider a reasonable range of alternatives to the Project. While CEQA requires that consideration be given to avoiding adverse environmental effects, the lead agency must balance adverse environmental effects against other public objectives, including the economic and social benefits of a project, in determining whether a project should be approved.

This EIR will be used as the primary environmental document to evaluate all subsequent planning and permitting actions associated with the proposed Project. Subsequent actions that may be associated with the proposed Project are identified in Chapter 2.0 (Project Description) of the Draft EIR. This EIR may also be used by other agencies within Santa Clara County, including the Local Agency Formation Commission (LAFCO), which may use this EIR during the preparation of environmental documents related to annexations, and Municipal Service Reviews in the Planning Area.

1.2 ENVIRONMENTAL REVIEW PROCESS

The review and certification process for the EIR has involved, or will involve, the following general procedural steps:

NOTICE OF PREPARATION

The City of Campbell circulated a Notice of Preparation (NOP) of an EIR for the proposed Project on March 23, 2022 to trustee and responsible agencies, the State Clearinghouse, and the public. A scoping meeting was held on April 12, 2022 at the City of Campbell City Hall. Public comments on the NOP related to the EIR were presented or submitted during the scoping meeting. During the 30-day public review period for the NOP, which ended on April 25, 2022, 9 written comment letters were received on the NOP. A summary of the NOP commenters is provided later in this chapter. The NOP and all comments received on the NOP are presented in Appendix A of the DEIR.

NOTICE OF AVAILABILITY AND DRAFT EIR

Campbell published a public Notice of Availability (NOA) for the Draft EIR on September 12, 2022, inviting comment from the general public, agencies, organizations, and other interested parties. The NOA was filed with the State Clearinghouse (SCH# 2022030566) and was published in the Santa Clara County Clerk's office and the Mercury News, pursuant to the public noticing requirements of CEQA. The Draft EIR was available for public review from September 12, 2022, through October 28, 2022. The Public Draft General Plan was also available for public review and comment during this time period.

The Draft EIR contains a description of the Project, description of the environmental setting, identification of Project impacts, and mitigation/minimization measures for impacts, as well as an analysis of Project alternatives, identification of significant irreversible environmental changes, growth-inducing impacts, and cumulative impacts. The Draft EIR identifies issues determined to have no impact or a less than significant impact, and provides detailed analysis of potentially significant and significant impacts. Comments received in response to the NOP were considered in preparing the analysis in the Draft EIR.

RESPONSE TO COMMENTS/FINAL EIR

The City of Campbell received eight comment letters regarding the Draft General Plan and Draft EIR from public agencies, organizations, and members of the public during the 45-day review period.

In accordance with CEQA Guidelines Section 15088, this Final EIR responds to the written comments received on the Draft EIR. The Final EIR also contains minor edits to the Draft EIR, which are included in Chapter 3.0 (Errata). This document and the Draft EIR, as amended herein, constitutes the Final EIR.

CERTIFICATION OF THE EIR/PROJECT CONSIDERATION

The Campbell City Council will review and consider the Final EIR. If the City Council finds that the Final EIR is "adequate and complete," then it may certify it in accordance with CEQA. The rule of adequacy generally holds that an EIR can be certified if:

- 1) The EIR shows a good faith effort at full disclosure of environmental information; and
- 2) The EIR provides sufficient analysis to allow decisions to be made regarding the proposed Project in contemplation of environmental considerations.

Upon review and consideration of the Final EIR, the Campbell City Council may take action to approve, revise, or reject the Project. A decision to approve the Campbell General Plan and Housing Element, for which this EIR identifies significant environmental effects, must be accompanied by written findings in accordance with State CEQA Guidelines Sections 15091 and 15093.

Policies and actions to minimize potential environmental impacts have been incorporated into the Project, to the extent feasible. No additional mitigation is feasible or available, as described in Chapters 3.1 through 4.0 of the Draft EIR. The annual report on General Plan status required pursuant to the Government Code will serve as the monitoring and reporting program for the Project.

1.3 ORGANIZATION OF THE FINAL EIR

This Final EIR has been prepared consistent with Section 15132 of the State CEQA Guidelines, which identifies the content requirements for Final EIRs. This Final EIR is organized in the following manner:

CHAPTER 1.0 – INTRODUCTION

Chapter 1.0 briefly describes the purpose of the environmental evaluation, identifies the lead agency, summarizes the process associated with preparation and certification of an EIR, and identifies the content requirements and organization of the Final EIR.

CHAPTER 2.0 – COMMENTS ON DRAFT EIR AND RESPONSES

Chapter 2.0 provides a list of commenters, copies of written comments made on the Draft EIR (coded for reference), and responses to those written comments.

CHAPTER 3.0 – ERRATA

Chapter 3.0 consists of minor revisions to the Draft EIR in response to comments on the Draft EIR. The revisions to the Draft EIR do not change the intent or content of the analysis, mitigation approaches, or increase the severity of any impact or identify any new impacts.

2.1 INTRODUCTION

No new significant environmental impacts or issues, beyond those already covered in the Draft EIR for the Envision Campbell General Plan Environmental Impact Report (DEIR), were raised during the comment period. Responses to comments received during the comment period do not involve any new significant impacts or add “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

CEQA Guidelines Section 15088.5 states that: *New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement.*

Sections 2.0 and 3.0 of this Final EIR include information that has been added to the EIR since the close of the public review period in the form of responses to comments and revisions.

2.2 LIST OF COMMENTERS

Table 2.0-1 lists the comments on the Draft EIR that were submitted to the City of Campbell (City) during the 45-day public review period for the Draft EIR. The assigned comment letter or number, letter date, letter author, and affiliation, if presented in the comment letter or if representing a public agency, are also listed. Letters received are coded with letters (A, B, etc.).

TABLE 2.0-1 LIST OF COMMENTERS ON DRAFT EIR

RESPONSE LETTER	INDIVIDUAL /SIGNATORY	AGENCY OR GROUP AFFILIATION	LETTER DATE
A	Lisa Brancatelli	Valley Water	October 28, 2022
B	Erin Chappell	California Department of Fish and Wildlife (CDFW)	October 28, 2022
C	N/A	Santa Clara County Fire Department (SCCFD)	N/A
D	Tim Pasquinelli	Consigliare - Campbell Technology Pk LLC)	October 27th, 2022
E	Vikki Essert		September 23, 2022
F	Julie Schaer, WVCWA and Vishakha Atre,	SCVURPPP	November 1, 2022
G	Liz Gibbons		October 28, 2022
H	Stacie Wolny		October 27, 2022

2.3 COMMENTS AND RESPONSES

REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate and respond to all comments on the Draft EIR that regard an environmental issue. The written response must address the significant environmental issue raised and provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, the written response must be a good faith and reasoned analysis. However, lead agencies need only to respond to significant environmental issues associated with the project and do not need to provide all the information requested by the commenter, as long as a good faith effort at full disclosure is made in the EIR (CEQA Guidelines Section 15204).

CEQA Guidelines Section 15204 recommends that commenters provide detailed comments that focus on the sufficiency of the Draft EIR in identifying and analyzing the possible environmental impacts of the project and ways to avoid or mitigate the significant effects of the project, and that commenters provide evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

CEQA Guidelines Section 15088 also recommends that revisions to the Draft EIR be noted as a revision in the Draft EIR or as a separate section of the Final EIR. Chapter 3.0 of this Final EIR identifies all revisions to the Draft EIR.

RESPONSES TO COMMENT LETTERS

Written comments on the Draft EIR are reproduced on the following pages, along with responses to those comments. To assist in referencing comments and responses, the following coding system is used:

Each letter is lettered or numbered (i.e., Letter A) and each comment within each letter is numbered (i.e., comment A-1, comment A-2).

Letter A

From: [Lisa Brancatelli](#)
To: [Stephen Rose](#)
Cc: [Colleen Haggerty](#)
Subject: Envision Campbell 2040 General Plan and Draft EIR Comments
Date: Friday, October 28, 2022 1:32:50 PM
Attachments: [image001.png](#)

Hello Stephen,

Valley Water has reviewed the Envision Campbell 2040 General Plan and the Draft Environmental Impact Report (EIR), received on September 12, 2022.

Within the City of Campbell, Valley Water has various water supply and flood protection facilities and right of way along those facilities and creeks. Any work, including any new public trails or access points, on Valley Water's fee title property or easement, will require the issuance of a Valley Water permit as per Valley Water's Water Resources Protection Ordinance and requires Valley Water to be considered a responsible agency under CEQA.

A-1

Based on our review of the Envision Campbell 2040 General Plan and draft EIR we have the following comments: (Please note that some comments address policies and discussions found in both the General Plan and the draft EIR and should be addressed in both documents as appropriate.)

1. References to "Santa Clara County Water District" need to be corrected to "Santa Clara Valley Water District" or "Valley Water" throughout both the 2040 General Plan and the draft EIR.

A-2

2. Action COS-7.i, needs to be revised in both documents to state the correct name "Guidelines and Standards for Land Use Near Streams", not "Guidelines for Land Use Near Streams".

A-3

Envision Campbell 2040 General Plan

3. Figure LU-1, Land Use Map, should identify all creeks within the plan area.

A-4

4. Goal LU-8, Pruneyard/Creekside District, and Goal CD-2, Harmony with the Natural Environment, include policies and actions that include connections and access to Los Gatos Creek Trail, such as requiring new developments to provide connections and access to the creek trail (LU-8.2). Any new trail connections proposed on or that open to Valley Water's property must be open to the general public and permitted by Valley Water and must also follow the Trails Policy recently adopted by Valley Water's Board of Directors.

Trail connections that are not located at existing street crossings of the creek can negatively affect Valley Water's maintenance operations. Connections to the trail need to be planned by the City to minimize the number of and locate the best access points based on planned future development/re-development. The City should have an overall plan for trail access points as Valley Water will not allow access points to be constructed at each development/site along the creek or have multiple connection points within any particular development/site.

5. Goal T-1, Complete Streets, and Action T-1.e, suggest providing public bike parking facilities throughout the city, including at trailheads. This action needs to note that Valley Water must approve and permit all work proposed on Valley Water's fee title property or easement. Also, coordination with County Parks may be required for trailheads located adjacent to the Los Gatos Creek County Park. Opportunities to add such amenities on Valley Water's right of way may be limited due to Valley Water's access and operational needs.

6. Goal CD-4, Public Spaces, and Policy CD-4.3, it is unclear what is meant by "developing" the creek. Work on creekside properties needs to be in accordance with the Guidelines and Standards for Land Use Near Streams (Guidelines and Standards), including specifying setbacks to the creek. It should also be noted that a Valley Water encroachment permit is required for any work proposed on Valley Water's fee title property, easement, or affecting Valley Water's facilities, as per the Water Resources Protection Ordinance.

7. Policy COS-1.7, please note that not all Valley Water land within the City is currently open to the public. The City would need to take responsibility for the recreational use of Valley Water land and enter into a joint use agreement to open up any additional Valley Water land for public use if approved by Valley Water.
8. Action COS-1.h, please note the City and Valley Water have been in coordination regarding the San Tomas Aquino Creek Trail Master Plan. Valley Water has provided feedback on the proposed trail and outlined requirements for implementation.
9. Goal COS-4, Trees and Vegetation, includes policies and actions requiring the use of locally sourced native and drought-tolerant plants and trees for landscaping. The use of native riparian plants in areas adjacent to creeks needs to be in conformance with the Guidelines and Standards. For conformance with the Guidelines and Standards locally native riparian species used need to be grown from plant stock sourced from the Los Gatos Creek watershed; Design Guides #2 and #4 of the Guidelines and Standards promote the use of local ecotypes of native species. Local ecotypes are not sourced at conventional nurseries nor are they available in large container sizes. Such plants typically require a custom nursery contract to collect and grow the plants with a one-year lead time and the resulting plants are smaller than 1 gallon in size and are used for riparian habitat mitigation or restoration. Alternatively, Design Guide #3 provides guidance for use of plantings for aesthetic purposes that can be purchased at conventional nurseries and will not negatively impact the existing locally native riparian plants.
10. Action COS-7.a, the Guidelines and Standards were developed by the Water Resources Protection Collaborative and adopted by the City of Campbell. The language under the Action needs to be revised for accuracy.
11. Action COS-7.d, specifies reverting some existing concrete-lined channels to more natural alternatives is a worthy goal to strive for; however, such projects in urban settings require significant land rights acquisitions in order to restore the creek while managing flood flow capacities. Currently, Valley Water does not have any capital projects in planning or design for the suggested work and flood protection improvements are still needed in many areas of the County in order to protect people and property from flooding. In addition, the City and the community would need to be committed to the effort since any alteration of the creeks would require additional land in order to convey the flood flows in the channel without hardscape slope protection. Costs for such an endeavor could be controlled if buildings are set back from the creeks to avoid the high cost of purchasing buildings.
12. Actions COS-7.e and 7. h, the language specified under these Actions should include a reference to the Guidelines and Standards.
13. As discussed in the comments from Valley Water in the response to the Notice of Preparation, the city is located in an area of the county that supports natural groundwater recharge. Natural groundwater recharge is an important element of the county's overall water supply, representing approximately 15% of the supply available. The cumulative effect of development throughout the county over the last 50 years has substantially reduced natural groundwater recharge as naturally pervious surfaces have been developed with impervious surfaces. To clarify the discussion on recharge areas, the text in the 5th paragraph of page 3.9-27 should be edited to indicate that there are recharge facilities in the Planning Area and that the Planning Area is in the Santa Clara Plain unconfined area (consistent with the 3rd paragraph on the same page). To strengthen policies regarding groundwater recharge, Valley Water suggests the following change to Policy COS-8.9:

A-4
Cont

- a. COS-8.9: Maintain and enhance the health of the groundwater basin by protecting existing natural recharge in open and permeable surfaces, encouraging new groundwater recharge opportunities, promoting the use of permeable surface materials, and providing ample areas of open space in order to decrease surface runoff and promote groundwater recharge, and through the use of other LID techniques, such as bioswales, where feasible.
14. As noted in the Water Supply Assessment and draft EIR on pages 3.15-2 and 3.15-17, water demand from development permitted in the General Plan is estimated to increase by 869 acre-feet per year. According to the Urban Water Management Plans (UWMP) for San Jose Water Company and Valley Water, this growth can be accommodated by projected future water supplies. However, it must be noted that the UWMPs for both agencies assume expanded water conservation efforts throughout the county. All cities within the county must take action to ensure that impacts on water supply from future growth are minimized, and Valley Water appreciates Campbell's commitment to water conservation in the General Plan. To ensure that future needs are met, Valley Water has the following suggestions to strengthen and clarify General Plan policies:
- a. CSF-3.7: Work collaboratively with local water districts to encourage the use of recycled water for irrigation and other non-potable uses.
 - b. CSF-3.8: Support water conservation measures that at a minimum comply with the State and Federal legislation and that are consistent with measures adopted in all applicable Urban Water Management Plans.
 - c. CSF-3.c: Regularly review and update the City's water conservation measures to be consistent with current best management practices for water conservation, considering measures recommended by the State Department of Water Resources, the California Urban Water Conservation Council, Valley Water, and the Bay Area Water Supply and Conservation Agency.
 - d. CSF-3.f: Continue educational outreach designed to increase public participation in water conservation and water quality awareness in coordination with San Jose Water Company and Valley Water through printed material and the City's website and social media accounts.
15. Action SA-2.f, this action should note that Valley Water maintains and inspects creeks on Valley Water land and flood protection facilities built by Valley Water.
16. Goal CHW-5, Physical Activity, the discussion regarding the gap analysis of the current trail and park system under Action CHW-5.c should note coordination with Valley Water and the Santa Clara County Parks Department, which operates and maintains Valley Water's land for public recreation along portions of the Los Gatos Creek Trail and Los Gatos Creek County Park, both of which are located within the City of Campbell.

A-4
Cont

Draft EIR

- 17. San Tomas "Aquinas" Creek needs to be corrected to San Tomas "Aquino" Creek throughout the DEIR.
- 18. References to "San Jose Water Company" need to be removed from the text referring to Valley Water's comments on the NOP, including on pages ES-2, 1.0-10, 3.9-1, and 3.15-1.
- 19. Page 1.0-5, Known Responsible and Trustee Agencies, Valley Water should be added to the list of responsible agencies, as work on Valley Water's right of way requires discretionary permits from Valley Water.

A-5

A-6

A-7

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|---|------|
| <p>20. Pages 2.0-20 and 3.4-22, Valley Water operates as the flood protection agency for Santa Clara County. Valley Water also provides stream stewardship and is the wholesale water supplier throughout the county, which includes the groundwater recharge program. Valley Water's water supply sources include groundwater, local surface water, and recycled water in addition to imported water.</p> <p>In accordance with Valley Water's Water Resources Protection Ordinance, any work within Valley Water's fee title property or easement or work that impacts Valley Water's facilities require the issuance of a Valley Water permit and requires Valley Water to be considered a responsible agency under CEQA. The language under this section of the document needs to be revised accordingly.</p> | A-8 |
| <p>21. Section 3.1, Aesthetics and Visual Resources, Valley Water is supportive of efforts to further protect riparian areas. The language under this section should reference the Guidelines and Standards as it guides development along the creeks.</p> | A-9 |
| <p>22. Section 3.4, Biological Resources, the Guidelines and Standards were developed and issued by the Water Resources Protection Collaborative. The language under this section needs to be revised for accuracy.</p> | A-10 |
| <p>23. Page 3.4-22, Santa Clara Valley Water District, the language under this section states that SCVWD owns the Los Gatos Creek Trail. This should be revised to clarify that Valley Water owns much of the land where the Los Gatos Creek Trail is located, but the trail is maintained and operated under joint use agreements with the County and the City of Campbell, where the trail is located within the City of Campbell.</p> | A-11 |
| <p>24. Page 3.4-28, the discussion of ponds under Impact 3.4-2, should be revised to state "contains multiple percolation ponds (i.e., Camden and Oka Ponds) used by Valley Water to recharge the underlying aquifer used to supply water within the County."</p> | A-12 |
| <p>25. Page 3.9-3, the language under Creeks and Waterways, incorrectly states there are only two creeks in the planning area, Los Gatos Creek and San Tomas Aquino Creek. Other creeks within the city include Smith Creek and East Smith Creek and should be included in the language regarding creeks within the planning area.</p> | A-13 |
| <p>26. Figure 3.9-4, needs to be revised to include the dam inundation area for Vasona Dam.</p> | A-14 |
| <p>27. Pages 3.9-4 and 3.15-28, note the Los Gatos Creek Trail runs along the <i>river</i>. This language should be corrected to the Los Gatos Creek Trail runs along the <i>creek</i>.</p> | A-15 |
| <p>28. Page 3.9-16, Santa Clara and Llagas Subbasins 2016 Groundwater Management Plan, and Page 3.9-27, Impact 3.9-2, include a description of Valley Water's 2016 Groundwater Management Plan. The description needs to be updated to reference Valley Water's updated 2021 Groundwater Management Plan which was adopted by the Board of Directors on November 21, 2021, and can be found here: https://s3.us-west-2.amazonaws.com/assets.valleywater.org/2021_GWMP_web_version.pdf.</p> | A-16 |
| <p>Page 3.9-17, West Valley Clean Water Program, the acronym SVCWP needs to be corrected to</p> | A-17 |

29.	WVCWP.	A-17 CONT
30.	Page 3.9-17 & 18, C.3 Handbook, and page 3.15-36, Impact 3.15-5, the language under these sections should be revised to note the Regional Water Quality Control Board (RWQCB) renewed the Municipal Regional Stormwater NPDES Permit on May 11, 2022 (Order No. R2-2022-0018, NPDES Permit No. CAS612008). This new permit also changes the threshold for compliance with Provision C.3 to 5,000 square feet from the previous 10,000 square feet.	A-18
31.	Pages 3.9-7, 3.9-37, and 3.9-38, Dam Inundation, should also note that a portion of the city is also within the inundation area of Vasona Dam and a description of this dam should be included. Also, for clarity, please note Valley Water's Dam Safety Program does not cover non-Valley Water owned dams, such as the Austrian Dam.	A-19
32.	Page 3.13-10, Valley Water owns and operates six groundwater recharge ponds within the City of Campbell. These recharge facilities consist of the Page, Sunnoaks, Budd Avenue, McGlincey, Oka, and Camden Ponds. The discussion and Table 3.13-1 incorrectly identify the "Camden Recharge Ponds" as the "Hacienda Percolation Ponds".	A-20
33.	Page 3.15-14, please note the 2012 Water Supply and Infrastructure Master Plan was updated in 2019 to the Water Supply Master Plan 2040.	A-21
34.	Impact 3.15-1 on page 3.15-15, and Impact 3.15-2 on pages 3.15-17 and 18, as noted in this discussion and the Water Supply Assessment, water demand from development permitted in the General Plan is estimated to increase 869 acre-feet per year. According to the Urban Water Management Plans (UWMP) for San Jose Water Company and Valley Water, this growth can be accommodated by projected future water supplies. However, it must be noted that the UWMPs for both agencies assume expanded water conservation efforts throughout the county. All cities within the county must take action to ensure that impacts on water supply from future growth are minimized, and Valley Water appreciates Campbell's commitment to water conservation in the General Plan.	A-22
35.	Page 3.15-28, Stormwater and Flood Control Facilities, please note the Clean, Safe Creeks and Natural Flood Protection (CSC) Plan was replaced in November 2012 by the Safe, Clean Water and Natural Flood Protection Program, which has the following 6 priorities:	A-23
	<ul style="list-style-type: none"> Priority A: Ensure a Safe, Reliable Water Supply Priority B: Reduce Toxins, Hazards, and Contaminants in our Waterways Priority C: Protect our Water Supply and Dams from Earthquakes and Other Natural Disasters Priority D: Restore Wildlife Habitat and Provide Open Space Priority E: Provide Flood Protection to Homes, Businesses, Schools, Streets, and Highways Priority F: Support Public Health and Public Safety for Our Community 	

36. Page 3.15-32, West Valley Clean Water Program, the discussion should remove SCVWD as they are not relevant to the discussion of the WVCWP.

A-24

We appreciate the opportunity to comment on the Envision Campbell 2040 General Plan and associated draft EIR. If you have any questions or need further information, you can reach me at (408) 630-2479, or by e-mail at L.Brancatelli@valleywater.org. Please reference Valley Water File No. 26513 in future correspondence regarding this project.

A-25

Thank you,

LISA BRANCATELLI

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Community Projects Review Unit

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Santa Clara Valley Water District is now known as



Clean Water • Healthy Environment • Flood Protection

5750 Almaden Expressway, San Jose CA 95118

www.valleywater.org

Response to Letter A: Santa Clara Valley Water District “Valley Water”

A-1: Valley Water provides an introduction to the comment letter.

This comment is introductory in nature and does not address the adequacy of the Draft EIR, and no further response is required.

A-2: The Commenter states that *“References to “Santa Clara County Water District” need to be corrected to “Santa Clara Valley Water District” or “Valley Water” throughout both the 2040 General Plan and the draft EIR.”*

The City appreciates the comments and input provided by the commenter. The City has made text revisions to references made to the Santa Clara Valley Water District throughout the DEIR and General Plan to clarify naming consistent with Valley Water comments. Changes are shown in ~~striketrough~~ and underline format.

DEIR Pg. 3.1-16 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.1-17 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.4-21 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.4-27 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.4-30 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.4-32 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.4-36 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.4-37 Santa Clara ~~County~~ Valley Water District

Text changed represent text corrections and or grammatical errors. This text change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update.

A-3. The Commenter references General Plan Action COS-7 and notes that it needs to be revised in both documents to state the correct name “Guidelines and Standards for Land Use Near Streams”, not “Guidelines for Land Use Near Streams”.

The City appreciates the comments and input provided by the commenter. The City has made text revisions to the General Plan and DEIR to reflect “Guidelines and Standards for Land Use Near Streams” naming updates. Changes are shown in ~~striketrough~~ and underline format.

DEIR Pg. 3.4-27 COS-7.i Adopt an ordinance incorporating the Guidelines and Standards for Land Use Near Streams into the Zoning Code.

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DEIR Pg. 3.4-30 COS-7.i Adopt an ordinance incorporating the Guidelines and Standards for Land Use Near Streams into the Zoning Code.

DEIR Pg. 3.4-32 COS-7.i Adopt an ordinance incorporating the Guidelines and Standards for Land Use Near Streams into the Zoning Code.

DEIR Pg. 3.4-36 COS-7.i Adopt an ordinance incorporating the Guidelines and Standards for Land Use Near Streams into the Zoning Code.

Text changed represent text corrections and or grammatical errors. This text change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update.

A-4: The commenter has provided comments and input related to various goals, policies, and actions in the General Plan.

The City appreciates the comments and input provided by the commenter. These comments do not address the adequacy of the Draft EIR analysis. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

A-5: The commenter requests that “San Tomas “Aquinas” Creek to be corrected to San Tomas “Aquino” Creek throughout the DEIR.

The City appreciates the comments and input provided by the commenter. San Tomas Aquino Creek, is also known as San Tomas Aquinas Creek. The U.S. Environmental Protection Agency’s List of Waters bodies and Waters GeoViewer GeoPlatform tool labels the creek as “San Tomas Aquinas Creek” as does GIS mapping tools and Google maps and other resources. As such, for mapping consistency this naming was incorporated. However, The City recognizes that “San Tomas Aquino” is also used locally.

This comment does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. No further response in required.

A-6: The commenter requests that references to “San Jose Water Company” be removed from the text referring to Valley Water’s comments on the NOP, including on pages ES-2, 1.0-10, 3.9-1, and 3.15-1.

The City appreciates the comments and input provided by the commenter. Text changed represent text corrections and or grammatical errors. Changes are shown in ~~striketrough~~ and underline format.

DEIR Pg. ES-2 ~~San Jose Water Company~~ (Valley Water)

DEIR Pg. 1.0-10 ~~San Jose Water Company~~ (Valley Water)

DEIR Pg. 3.9-1 ~~The San Jose Water Company (Valley Water)~~

DEIR Pg. 3.15-1 ~~The San Jose Water Company (Valley Water)~~

This text change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis.

A-7: The commenter references DEIR Page 1.0-5, and requests that Valley Water be added to the list of Known Responsible Agencies, as work on Valley Water's right of way requires discretionary permits from Valley Water.

The City appreciates the comments and input provided by the commenter. Text revisions adding Valley Water to the list of agencies will be included. Changes are shown in ~~striketrough~~ and underline format.

DEIR Pg. 1.0-5

- Santa Clara Valley Water District (Valley Water)

These text revisions represent minor text corrections. This text change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis.

A-8: The commenter references DEIR Pages 2.0-20 and 3.4-22, and notes that Valley Water operates as the flood protection agency for Santa Clara County. Valley Water also provides stream stewardship and is the wholesale water supplier throughout the county, which includes the groundwater recharge program. Valley Water's water supply sources include groundwater, local surface water, and recycled water in addition to imported water. In accordance with Valley Water's Water Resources Protection Ordinance, any work within Valley Water's fee title property or easement or work that impacts Valley Water's facilities require the issuance of a Valley Water permit and requires Valley Water to be considered a responsible agency under CEQA.

The City appreciates the comments and input provided by the commenter. As shown under response A-7, text revisions adding Valley Water to the list of Known Responsible Agencies was included. These comments provide additional details related to Valley Water's role within the County and do not address the adequacy of the Draft EIR analysis. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

A-9: The commenter references DEIR Section 3.1, Aesthetics and Visual Resources, and states that Valley Water is supportive of efforts to further protect riparian areas. The language under this section should reference the Guidelines and Standards as it guides development along the creeks.

The City appreciates the comments and input provided by the commenter. These comments provide additional details related to Valley Water’s role within the County and do not address the adequacy of the Draft EIR analysis. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

A-10: The commenter references Section 3.4, Biological Resources, and states “the Guidelines and Standards were developed and issued by the Water Resources Protection Collaborative” and requests the language under this section be revised for accuracy.

The City appreciates the comments and input provided by the commenter. Text change represent text corrections and or grammatical errors. Updated text is included on DEIR Page 3.4-22 to reference the Water Resources Protection Collaborative. Changes are shown in ~~striketrough~~ and underline format.

DEIR Pg. 3.4-22 The ~~SCVWD~~ Water Resources Protection Collaborative issued Guidelines and Standards for Land Use Near Streams:

This text change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis.

A-11: The commenter references DEIR Page 3.4-22, and states that this section should be revised to clarify that Valley Water owns much of the land where the Los Gatos Creek Trail is located, but the trail is maintained and operated under joint use agreements with the County and the City of Campbell, where the trail is located within the City of Campbell.

The DEIR Text has been updated to identify Valley Water. These revisions are shown in ~~striketrough~~ and underline format.

DEIR Pg. 3.4-22 The ~~SCVWD~~ Valley Water owns much of the land where the Los Gatos Creek Trail located in the southeast corner of Campbell and would be a responsible agency if any future projects would result in work 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.

This text change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis.

A-12: The commenter references DEIR Page 3.4-28, Impact 3.4-2, and states that this section should be revised to provide detailed information related to percolation ponds.

The City appreciates the comments and input provided by the commenter. These comments provide additional details related to Valley Water's role within the city and county and do not address the adequacy of the Draft EIR analysis. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

A-13: The commenter references DEIR Page 3.9-3 and states that this section should be revised to include other creeks within the city including: Smith Creek and East Smith Creek.

As noted on DEIR Page 3.4-28 Impact 3.4-2 aquatic resources found in the Planning Area include: San Tomas Aquinas Creek, Smith Creek, and Los Gatos Creek. The City appreciates the comments and input provided by the commenter. To provide DEIR consistency the language under Creeks and Waterways, has been revised to list Smith Creek identified by the commenter in DEIR Page 3.9-3. These revisions are shown in ~~striketrough~~ and underline format.

DEIR Pg. 3.9-3. ~~Two~~ Several creeks are located within the City's Planning Area: Los Gatos Creek, ~~and San Tomas Aquino Creek,~~ and Smith Creek.

The City appreciates the comments and input provided by the commenter. These comments do not address the adequacy of the Draft EIR analysis. This text change does not involve any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update.

A-14: The commenter references Figure 3.9-4, and states that the figure should be revised to include the Vasona Dam.

Figure 3.9-4 shows areas within the city impacted by dam failure. The City appreciates the comments and input provided by the commenter. The Vasona Dam inundation maps were reviewed and do not show inundation areas within any habitable portion of the city, within any city facility, or within areas designated by the City for future development. Vasona Dam Inundation areas show a small portion of the W Valley Fwy (SR 85) ROW impacted. Text revisions to describe the Vasona Dam and Inundation areas and a new Exhibit (3.9-1) is included on DEIR Pg. 3.9.-7. These revisions are shown in ~~striketrough~~ and underline format.

DEIR Pg. 3.9.-7.

Vasona Dam and reservoir is located on Los Gatos Creek within the town of Los Gatos. The Vasona Lake Dam and Reservoir is one of six original reservoirs approved by the voters in 1934. The reservoir capacity is 495 acre-feet. The surface area is 57 acres. The dam was completed in 1935 and new gates were installed in 1997. The dam inundation area is shown below in Exhibit 3.9-1. As shown the inundation area impacts the SR 85 Roadway in the southernmost portion of the Planning Area.

Exhibit 3.9-1 Vasona Dam inundation Area:



This text change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis. No further response in this EIR is required.

A-15: The commenter references DEIR Pages 3.9-4 and 3.15-28, and notes the Los Gatos Creek Trail runs along “creek” rather than the “river “

The City appreciates the comments and input provided by the commenter. These text revisions represent text corrections and or grammatical errors. These revisions are shown in ~~strikethrough~~ and underline format.

DEIR Pg. 3.9-4 ~~river~~ creek

DEIR Pg. 3.15-28 ~~river~~ creek

This text change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis.

A-16: The commenter references DEIR Page 3.9-16, and Page 3.9-27, and Impact 3.9-2, that reference Valley Water’s 2016 Groundwater Management Plan and notes that the description should be updated to reference Valley Water’s updated 2021 Groundwater Management Plan which was adopted by the Board of Directors on November 21, 2021.

The City appreciates the comments and input provided by the commenter. Information related to the Groundwater Management Plan including background information and the preparation of the Existing Conditions Report during the General Plan Update process was accesses in late 2020. As such several reverences to the 2016 plan are also included.

The Regulatory Setting and References section has been revised to include this text revisions. These revisions are shown in ~~strikethrough~~ and underline format.

DEIR Pg. 3.9-16

Santa Clara and Llagas Subbasins ~~2016~~ 2021 Groundwater Management Plan

The ~~2016~~ 2021 Groundwater Management Plan (GWMP) for the Santa Clara and Llagas Subbasins describes the SCVWD's comprehensive groundwater management framework, including existing and potential actions to achieve basin sustainability goals and ensure continued sustainable groundwater management.

DEIR Section 7.0 (Reference)

Santa Clara Valley Water District Water Supply Master Plan 2040. November 2019. Available At: https://www.valleywater.org/sites/default/files/Water%20Supply%20Master%20Plan%202040_11.01.2019_v2.pdf

This text change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis.

A-17: The commenter references DEIR Page 3.9-17, and notes the acronym SVCWP needs to be corrected to WVCWP.

The City appreciates the comments and input provided by the commenter. These text revisions represent text corrections and or grammatical errors. These revisions are shown in ~~strikethrough~~ and underline format.

DEIR Pg. 3.9-17 ~~SVCWP~~ WVCWP

This text change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis.

A-18: The commenter references DEIR Page 3.9-17 & 18, and page 3.15-36, Impact 3.15-5, and states the language under these sections should be revised to note the Regional Water Quality Control Board (RWQCB) renewed the Municipal Regional Stormwater NPDES Permit on May 11, 2022 (Order No. R2-2022-0018, NPDES Permit No. CAS612008) and notes this new permit also changes the threshold for compliance with Provision C.3 to 5,000 square feet from the previous 10,000 square feet.

The City appreciates the comments and input provided by the commenter. Information related to this section including background information for the DEIR and Notice of Preparation of this DEIR was accessed prior to the renewed the Municipal Regional Stormwater NPDES Permit on May 11, 2022. The NOP for the Project was published prior to this order on 3/21/22.

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Permits and thresholds of compliance and review requirements will change throughout the life of the General Plan. No development is specifically proposed or would be approved as part of the proposed General Plan Update.

Additionally, General Plan Policy CSF-5.2 and actions COS-7.b COS-7.j CSF-5.f require a development review process and as required by the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit, and would continue to implement a comprehensive municipal stormwater pollution-prevention program in compliance with requirements of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) and the C.3 Stormwater Handbook. Compliance with these policies and actions would require compliance with the updated permit and the thresholds associated with Project review requirements.

The References section has been revised to include this text revisions. These revisions are shown in ~~strikethrough~~ and underline format.

DEIR Section 7.0 (Reference)

Regional Water Quality Control Board (RWQCB) Municipal Regional Stormwater NPDES Permit, May 11, 2022 (Order No. R2-2022-0018, NPDES Permit No. CAS612008)

These comments do not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. These comments do not address the adequacy of the Draft EIR analysis. As such, no additional response is required.

A-19: The commenter references DEIR Pages 3.9-7, 3.9-37, and 3.9-38, Dam Inundation, and notes that a portion of the city is also within the inundation area of Vasona Dam and a description of this dam should be included. Also, commenter notes Valley Water’s Dam Safety Program does not cover non-Valley Water owned dams.

The City appreciates the comments and input provided by the commenter. As stated previously the Vasona Dam inundation maps were reviewed and do not show inundation areas within any habitable portion of the city or within any City facility. Vasona Dam Inundation areas show a small portion of the W Valley Fwy (SR 85) ROW impacted. Text revisions to describe the Vasona Dam and Inundation areas and updated text related to the Dame Safety Program is included on DEIR Pg. 3.9.-7 as presented under Response A-14.

Text revisions presented under Response A-14 represent text corrections and revised text descriptions. This text change does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis.

A-20: The commenter references DEIR Page 3.13-10, and Table 3.13-1 and states: Valley Water owns and operates six groundwater recharge ponds within the City of Campbell. These recharge facilities consist of the Page, Sunnyoaks, Budd Avenue, McGlincey, Oka, and Camden Ponds and notes that the discussion and Table 3.13-1 incorrectly identify the “Camden Recharge Ponds” as the “Hacienda Percolation Ponds.

Hacienda/ Winchester Percolation Ponds are listed in as facilitates to identify the location of the facilities in Table 3.13.1 consistent with city documents.

<https://www.campbellca.gov/facilities/facility/details/Hacienda-Winchester-Percolation-Ponds-24>

However, to provide consistency with Valley Water Facilities naming the following text edit has been made to reflect the updating naming per Valley Water comments. These revisions are shown in ~~strikethrough~~ and underline format.

DEIR Pg. 3.13-10 The ~~Hacienda Percolation Ponds~~ Camden Ponds

These text edits do not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. These comments do not address the adequacy of the Draft EIR analysis. As such, no additional response is required.

A-21: The commenter references DEIR Page 3.15-14, and notes the 2012 Water Supply and Infrastructure Master Plan was updated in 2019 to the Water Supply Master Plan 2040.

These text revisions represent text corrections and revised text descriptions. These revisions are shown in ~~strikethrough~~ and underline format.

DEIR Page 3.15-14 ~~Santa Clara Valley Water District Water Supply and Infrastructure Master Plan 2040~~

DEIR Page 3.15-14 The SCVWD’s ~~2012 Water Supply and Infrastructure Master Plan 2040~~

This text revision does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis.

A-22: The commenter references DEIR Impact 3.15-1 on page 3.15-15, and Impact 3.15-2 on pages 3.15-17 and 18, as notes that the UWMPs for both agencies assume expanded water conservation efforts throughout the county. All cities within the county must take action to ensure that impacts on water supply from future growth are minimized, and Valley Water appreciates Campbell’s commitment to water conservation in the General Plan.

The City appreciates the comments and input provided by the commenter. These comments do not address the adequacy of the Draft EIR analysis. These comments have been forwarded to

2.0 COMMENTS ON DRAFT EIR AND RESPONSES

the Planning Commission and City Council for consideration. No further response in this EIR is required.

A-23: The commenter references DEIR Page 3.15-28, and notes the Clean, Safe Creeks and Natural Flood Protection (CSC) Plan was replaced in November 2012 by the Safe, Clean Water and Natural Flood Protection Program, which has the following 6 priorities:

- Priority A: Ensure a Safe, Reliable Water Supply
- Priority B: Reduce Toxins, Hazards, and Contaminants in our Waterways
- Priority C: Protect our Water Supply and Dams from Earthquakes and Other Natural Disasters
- Priority D: Restore Wildlife Habitat and Provide Open Space
- Priority E: Provide Flood Protection to Homes, Businesses, Schools, Streets, and Highways
- Priority F: Support Public Health and Public Safety for Our Community

Text revisions per comments represent text corrections and revised text descriptions. These revisions are shown in ~~strikethrough~~ and underline format.

DEIR Page 3.15-28: The Safe, Clean Water and Natural Flood Protection Program, has the following 6 priorities:

Priority A: Ensure a Safe, Reliable Water Supply

Priority B: Reduce Toxins, Hazards, and Contaminants in our Waterways

Priority C: Protect our Water Supply and Dams from Earthquakes and Other Natural Disasters

Priority D: Restore Wildlife Habitat and Provide Open Space

Priority E: Provide Flood Protection to Homes, Businesses, Schools, Streets, and Highways

Priority F: Support Public Health and Public Safety for Our Community

~~The Clean, Safe Creeks and Natural Flood Protection (CSC) Plan was approved by Santa Clara County voters in November 2000 to create a countywide special parcel tax to accomplish the following four goals:~~

- ~~• 100-year flood protection for homes, schools, businesses, and transportation;~~
- ~~• Clean, safe water in Santa Clara County creeks and bays;~~
- ~~• Healthy creek and bay ecosystems; and~~
- ~~• Trails, parks, and open space along waterways.~~

This text change does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis. No further response in this EIR is required.

A-23: The commenter references DEIR Page 3.15-32, West Valley Clean Water Program, and notes the discussion should remove the reference to SCVWD.

The following text revisions have been made to the DEIR to clarify information included in the regulatory setting. These revisions are shown in ~~strikethrough~~ and underline format.

~~DEIR Page 3.15-32 The West Valley Clean Water Program (WVCWP) was established in 1994 as a collaborative effort between the smaller west valley communities (Campbell, Monte Sereno, Saratoga, and Los Gatos) to implement stormwater pollution control and management efforts. The WVCWP goal is to reduce pollutants in storm drain discharges, comply with MRP regulations and requirements, and maximize the effectiveness of pollution prevention efforts. The Santa Clara Valley Water District (SCVWD) administers an Urban Runoff Management Plan to reduce stormwater pollution, which includes the following specific actions:~~

- ~~• Municipal controls such as storm drain stenciling, storm drain operation and maintenance (O&M), street sweeping, street/public facilities maintenance, and illegal discharge response.~~
- ~~• Construction and development measures including on-site inspections, grading and erosion controls, and educating developers.~~
- ~~• Commercial and industrial facility inspections to prevent wastes from discharging into the storm drain system.~~
~~Public education activities to increase awareness and change behavior.~~

~~By agreement with the participating cities and towns, the WVSD collects an additional surcharge from residences and commercial properties to fund the WVCWP. The SCVWD complies with the requirements of the MRP for urban runoff pollution control.~~

The West Valley Clean Water Program Authority (Authority) serves as the Stormwater Pollution Prevention Authority for the cities of Campbell, Monte Sereno, Saratoga, and the Town of Los Gatos. The Authority was created to maximize the effectiveness, efficiency, and cost-benefit of collective stormwater pollution prevention efforts of the four West Valley communities. The Authority was formally established in February 2018 but has been operating as a collaborative stormwater management program since 1992.

The Authority’s member agencies must comply with the NPDES stormwater permit, which mandates certain activities including maintenance of the stormwater drain system.

The Authority develops an annual work plan to fulfill the requirements of its MRP and to reduce the amount of pollutants discharged in urban runoff. The plan is a comprehensive program that

is designed to reduce the discharge of pollutants to the maximum extent practicable and encompasses best practices for the following operational areas:

- Construction Site Stormwater Runoff Control
- Commercial Facilities
- Illicit Discharge Detection and Elimination
- Industrial Facilities
- Municipal Operations/Pollution Prevention and Good Housekeeping
- Post Construction Storm Water Management
- Public Education
- Public Participation

The Authority also participates in the Santa Clara Valley Urban Runoff Program (Program). The Program is an association of thirteen cities and towns in Santa Clara Valley, the County of Santa Clara, and the Santa Clara Valley Water District that share a common permit to discharge stormwater to South San Francisco Bay. Member agencies include Campbell, County of Santa Clara, Cupertino, Los Altos, Los Altos Hills, Los Gatos, Milpitas, Monte Sereno, Mountain View, Palo Alto, San Jose, Santa Clara, Santa Clara Valley Water District, Saratoga, and Sunnyvale.

These text revisions represent text corrections and revised text descriptions. This text change does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. These comments do not address the adequacy of the Draft EIR analysis. No further response in this EIR is required.

A-24: The commenter states they appreciate the opportunity to comment on the Envision Campbell 2040 General Plan and associated draft EIR.

This comment provides a conclusion statement for the comment and does not address the adequacy of the Draft EIR, and no further response is required.

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State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 Bay Delta Region
 2825 Cordelia Road, Suite 100
 Fairfield, CA 94534
 (707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
 CHARLTON H. BONHAM, Director



October 28, 2022

Stephen Rose, Senior Planner
 City of Campbell
 70 N. First Street
 Campbell, CA 95008
stephenr@campbellca.gov

Subject: Envision Campbell General Plan and Housing Element Update, Draft Environmental Impact Report, SCH No. 2022030566, City of Campbell, Santa Clara County

Dear Stephen Rose:

The California Department of Fish and Wildlife (CDFW) received a DEIR from the City of Campbell (City) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

B-1

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California’s **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

B-2

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The “CEQA Guidelines” are found in Title 14 of the California Code of Regulations, commencing with section 15000.

Conserving California’s Wildlife Since 1870

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proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority (Fish & G. Code, § 1600 et seq.).

B-2 Cont

PROJECT DESCRIPTION SUMMARY

Proponent: City of Campbell

Objective: Update the City General Plan, including land use map, goals, policies, and actions to guide future development through 2040.

B-3

Location: All areas within the City of Campbell, Santa Clara County, California.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on potential for the Project to have a significant impact on biological resources, CDFW concludes that an Environmental Impact Report is appropriate for the Project. CDFW provided comments and recommendations on the Notice of Preparation for the proposed Project in a letter dated April 20, 2022. Some of the recommendations provided in CDFW's letter on the NOP were not incorporated in the DEIR; therefore, CDFW is further addressing those recommendations such as Comment #1 below which should be incorporated in the Final EIR.

B-4

I. Mitigation Measures and Impacts

Would the Project interfere substantially with movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede use of native wildlife nursery sites?

COMMENT #1: Figure 5.0-1 Existing General Plan Land Use Map, Figure 2.0-2 Proposed Land Use Map, Impact 3.4-4 page 3.4-33

Issue: In review of Google Earth aerials, the reaches of Los Gatos Creek located within the Project area support a contiguous riparian corridor with thick canopy cover. There is also a contiguous riparian corridor within the urban reaches upstream from the Project (Town of Los Gatos) and downstream from the Project (City of San Jose).

B-5

The Existing General Plan Land Use Map (Figure 5.0-1) clearly shows the furthest downstream reach of Los Gatos Creek in the Project area designated as Open Space. The Open Space designation, in summary, is designated for parks, groundwater recharge areas, creek corridors, and other areas where limited development, such park facilities, trails, and utilities, could occur. Exhibit 1 to this

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letter is Figure 5.0-1 with emphasis added to indicate the creek reach of concern. This Open Space designation is consistent with the proposed Project Open Space Element Policies and Actions that include preservation, protection, and enhancement of riparian areas (Policy 7.2, 7.5, 7.6 and Action 7.a, 7.h).

Impact 3.4-4, regarding movement of fish and wildlife species, page 3.4-33, states that "As shown in the proposed General Plan Land Use Map, Open Space land uses are found adjacent to and along the complete stretch of Los Gatos Creek." However, the Proposed Land Use Map (Figure 2.0-2) shows that the lowest downstream reach of Los Gatos Creek being designated as General Commercial. Exhibit 2 to this letter is Figure 2.0-2 with emphasis added to indicate the creek reach of concern. In CDFW review and comparison with aerial photographs, this General Commercial designation encompass the entire riparian corridor in this creek reach (Exhibit 3). General Commercial designation could include construction of buildings and high volumes of automobile or transit traffic. This General Commercial designation is not consistent with the proposed Project Open Space Element Policies and Actions that include preservation, protection, and enhancement of riparian areas (Policy 7.2, 7.5, 7.6 and Action 7.a, 7.h).

Additionally, the DEIR does not discuss mitigation measures to reduce the impact of development located adjacent to fish and wildlife riparian corridors.

Why impact would occur: The General Commercial physical change may include the construction of buildings, parking lots, and is expected to have high volumes of automobile or transit traffic. Several land use designations within the proposed Project are adjacent to riparian corridors (e.g., residential, commercial, industrial) and may include construction of buildings, parking lots, and transportation infrastructure.

Specific impact: Potential impacts due to a General Commercial use, as well as other land use designations (e.g., residential, commercial, industrial), within Los Gatos Creek may result in this reach not being usable or habitable by native fish and wildlife. These impacts may include loss of riparian vegetation, permanent relocation of the creek, permanent loss of natural bank, change in contour and gradient of bed and bank, full or partial blockage of natural flow, diversion of natural flow, and visual or noise disturbance (e.g., buildings or infrastructure in or adjacent to flight path, prevention or alteration of wildlife movement due to night lighting or vehicular and human movement).

Evidence impact would be significant: Habitat loss, fragmentation, and degradation resulting from land use changes or habitat conversion can alter the use and viability of fish and wildlife riparian movement corridors. Riparian corridors maintain connectivity for daily movement and migration, foraging, genetic interchange, and population movement in response to environmental change or

B-5
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natural disaster. The General Commercial designation may result in impacts that may potentially substantially reduce the abundance and diversity of fish and wildlife species within the riparian corridor. It is especially important to preserve riparian corridors that are surrounded by urban areas.

Recommended Potentially Feasible Mitigation Measures to reduce impacts to less-than-significant:

Mitigation Measure #1:

The Proposed Land Use Map (Figure 2.0-2) containing a General Commercial designation in the lowest downstream reach of Los Gatos Creek within the Project area should be changed back to the Open Space designation as in the Existing General Plan Land Use Map (Figure 5.0-1).

Mitigation Measure #2:

In areas adjacent to riparian corridors, the DEIR should include location alternatives for buildings, roads, and other permanent structures to avoid impacts to riparian habitat.

B-5
 Cont

Would the Project 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 CDFW or U.S. Fish and Wildlife Service?

COMMENT #2: 3.4.2 Regulatory Setting page 3.4-19, Impact 3.4-1 page 3.4-23

Issue: In review of Google Earth aerials, the Project area includes riparian habitat, parks, open fields, and urban areas with trees, shrubs, and grassland where birds could potentially nest. Impact 3.4-1 includes a list of significant impacts such as direct mortality due to removal of trees with active nests and abandoned eggs or young and subsequent nest failure. This list only discusses impacts to special status species. The Regulatory Setting, page 3.4-19, discusses California Fish and Game Code as only being applicable to predatory birds. However, Fish and Game Code 3503 and 3513 are applicable to all birds and birds listed within the Migratory Bird Treaty Act (see Evidence impact would be significant section below). Although the DEIR states that impacts to nesting birds could occur, specific mitigation measures to avoid take are not included.

Why impact would occur: The physical change in relation to the residential, commercial, and other land use designations may include the construction of buildings, parking lots, and other permanent structures. Construction may result in complete removal of nesting habitat. The Project may also include impacts such as

B-6

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noise, groundwork, and movement of workers adjacent to nesting habitat that may potentially significantly impact nesting birds.

Specific impact: Direct mortality, nest abandonment, reduced reproductive success, and loss or reduced health or vigor of eggs or young.

Evidence impact would be significant: Take of nesting birds, birds in the orders Falconiformes or Strigiformes, and migratory nongame bird as designated in the Migratory Bird Treaty Act is a violation of Fish and Game Code (§ 3503, 3503.5, 3513). The measures proposed for sensitive and special-status species (Impact 3.4-1) include habitat protection in particular areas of the City, but do not address all Project impact areas and the mitigation measures do not specifically mitigate for take of nesting birds, eggs, and young under Fish and Game Code.

Recommended Potentially Feasible Mitigation Measures to reduce impacts to less-than-significant:

Mitigation Measure #1: Nesting Bird Surveys

If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist should conduct a minimum of two surveys for active nests of such birds within 14 days prior to the beginning of Project construction, with a final survey conducted within 48 hours prior to construction. Surveys should be conducted in all potential bird-nesting locations including grasslands, shrubs, and trees. However, species-specific survey protocols may be available and should be followed. Appropriate minimum survey radii surrounding the work area are typically the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; and iii) 1,000 feet for larger raptors such as buteos. Surveys should be conducted at the appropriate times of day and during appropriate nesting times.

Mitigation Measure #2: Active Nest Buffers

If the qualified biologist documents active nests within the Project area or in nearby surrounding areas, an appropriate buffer between the nest and active construction should be established. The buffer should be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist should conduct baseline monitoring of the nest to characterize “normal” bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist should monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the

B-6
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nest). If buffer establishment is not possible, the qualified biologist or construction foreman should have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active.

B-6
Cont

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

B-7

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

B-8

CONCLUSION

CDFW appreciates the opportunity to comment on the DEIR to assist the City in identifying and mitigating Project impacts on biological resources. Questions regarding this letter or further coordination should be directed to Kristin Garrison, Environmental Scientist, at (707) 944-5534 or by email at Kristin.Garrison@wildlife.ca.gov; or Brenda Blinn, Senior Environmental Scientist (Supervisory), at (707) 339-0334 or Brenda.Blinn@wildlife.ca.gov.

B-9

Sincerely,

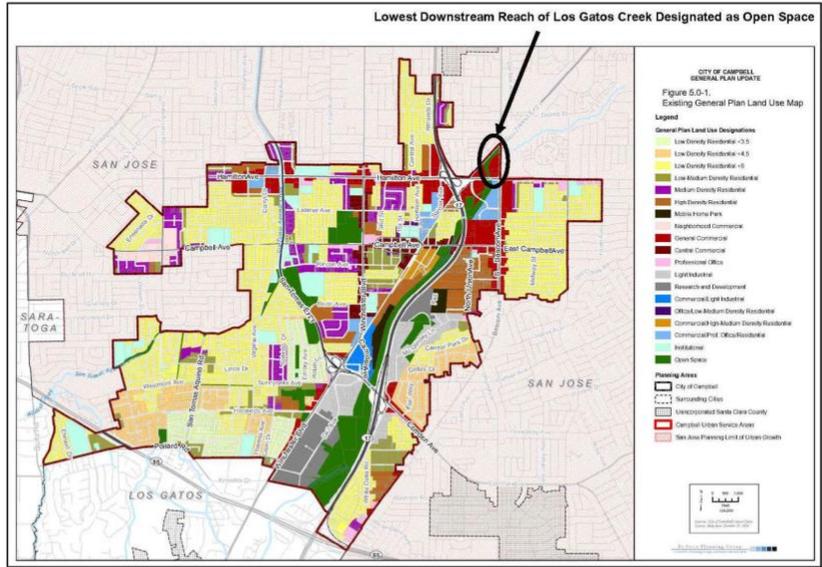
DocuSigned by:
Erin Chappell
B77E9A6211EF486
Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Planning and Research, State Clearinghouse, Sacramento

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Exhibit 1. Existing General Plan Land Use Map. Lowest downstream reach of Los Gatos Creek within Project area designated as Open Space (black circle, arrow, and text added as emphasis).



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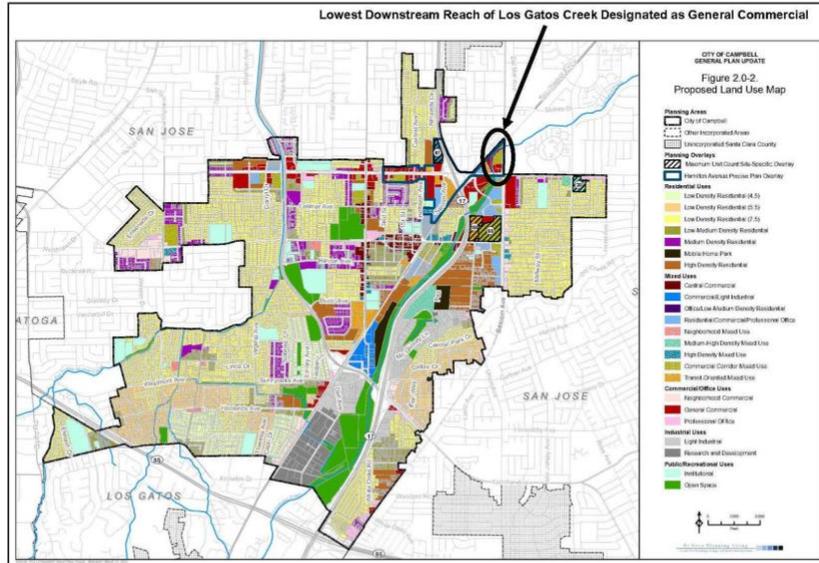
Exhibit 3. Aerial photograph showing the lowest downstream reach of Los Gatos Creek within the Project area showing a wide riparian corridor with thick canopy cover (black circle, arrow, and text added as emphasis).



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Exhibit 2. Proposed Land Use Map. Lowest downstream reach of Los Gatos Creek within Project area designated as General Commercial (black circle, arrow, and text added as emphasis).



Response to Letter B: California Department of Fish and Wildlife (CDFW)

B-1: The commenter provides an introductory statement related to the CDFW review of Projects.

This comment is noted. This comment is introductory in nature and does not address the adequacy of the Draft EIR, and no further response is required.

B-2: The commenter provides an introductory statement related to the ADFW Role as a trustee and responsible agency.

This comment is noted. This comment is introductory in nature and does not address the adequacy of the Draft EIR, and no further response is required.

B-3: The commenter provides a description and summary of the Proposed Project. The commenter states that the Location of the project includes *“All areas within the City of Campbell, Santa Clara County, California”*.

This comment is introductory in nature and does not address the adequacy of the Draft EIR, and no further response is required.

B-4: The commenter states that the CDFW offers the comments and recommendations below to assist the City in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additionally, the commenter states that some of the recommendations provided in CDFW’s letter on the NOP were not incorporated in the DEIR; therefore, CDFW is further addressing those recommendations below which should be incorporated in the Final EIR.

This comment is noted. All comments received during the NOP review period are included in Appendix A of the Draft EIR. This comment is introductory in nature and does not address the adequacy of the Draft EIR, each CDFW comment on the DEIR are included below, and no further response is required..

B-5: The Commenter references DEIR Figure 5.0-1 Existing General Plan Land Use Map, and Figure 2.0-2 Proposed Land Use Map, and Impact 3.4-4 on DEIR page 3.4-33. The commenter states: *“The Existing General Plan Land Use Map (Figure 5.0-1) clearly shows the furthest downstream reach of Los Gatos Creek in the Project area designated as Open Space. The Open Space designation, in summary, is designated for parks, groundwater recharge areas, creek corridors, and other areas where limited development, such as park facilities, trails, and utilities, could occur. Exhibit 1 to this letter is Figure 5.0-1 with emphasis added to indicate the creek reach of concern. This Open Space designation is consistent with the proposed Project Open Space Element Policies and Actions that include preservation, protection, and enhancement of riparian areas (Policy 7.2, 7.5, 7.6 and Action 7.a, 7.h).*

The Commenter references DEIR Impact 3.4-4, regarding movement of fish and wildlife species, Page 3.4-33, states that *“As shown in the proposed General Plan Land Use Map, Open Space land uses are found adjacent to and along the complete stretch of Los Gatos Creek.”*

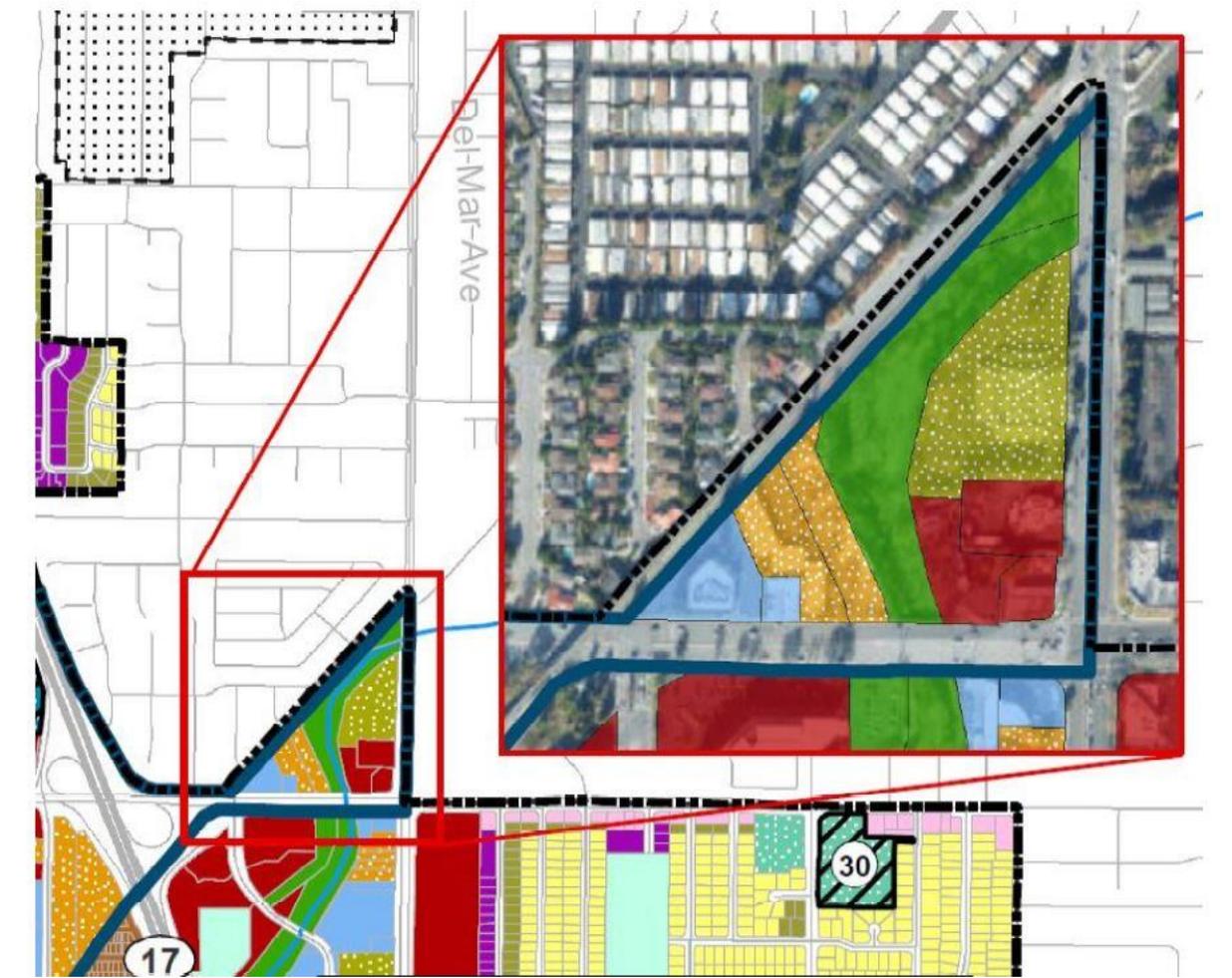
However, the commenter states: *“Proposed Land Use Map (Figure 2.0-2) shows that the lowest downstream reach of Los Gatos Creek being designated as General Commercial. Exhibit 2 to this letter is Figure 2.0-2 with emphasis added to indicate the creek reach of concern. In CDFW review and comparison with aerial photographs, this General Commercial designation encompass the entire riparian corridor in this creek reach (Exhibit 3). General Commercial designation could include construction of buildings and high volumes of automobile or transit traffic. This General Commercial designation is not consistent with the proposed Project Open Space Element Policies and Actions that include preservation, protection, and enhancement of riparian areas (Policy 7.2, 7.5, 7.6 and Action 7.a, 7.h).”*

The Commenter concludes the General Commercial designation may result in impacts that may potentially substantially reduce the abundance and diversity of fish and wildlife species within the riparian corrido and notes that It is especially important to preserve riparian corridors that are surrounded by urban areas.

The City of Campbell appreciates the commenter’s concerns related to changes in land use designations along Los Gatos Creek that would result in encroachment of commercial uses. The City has taken a thoughtful and holistic approach to updates to the proposed land use map, including protecting existing open space buffers along the creek corridor. The encroachment of new commercial uses into the creek corridor referenced by the commenter was the result of an inadvertent map change to the Land Use Map and is considered a mapping error. No changes to these parcels are included as part of the General Plan Update and the Land Use Map has been corrected accordingly to include the existing Open Space designation (OS) on the approximately 4.27 acres along the creek corridor as identified by the CDFW, consistent with the existing designations along this area in question.

This comment is noted. Upon review of this portion of the DEIR, the City has made the following changes (as represented on the following map) to the Land Use Map to correct a mapping error. As such the proposed Land Use Map has been updat~~er~~ for clarity and correctness per CDFW comments. Exhibit 2-1: shows the areas of concern identified by the CDFW, and corrected parcel designations to be included on the Proposed Land Use Map. These revisions are shown in ~~strikethrough~~ and underline format.

Exhibit 2-1: Areas of Concern and Corrected OS Parcel Designations.



This change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. The City has included broad and extensive policies and actions in the General Plan to ensure the protection of water resources throughout the planning area, and is committed to protecting riparian corridors. Changes to the Lands Use Map represent the correction of a mapping error, and no further response is required.

B-6 The Commenter references DEIR pg. 3.4-19 (Regulatory Setting) and states: *“Page 3.4-19, discusses California Fish and Game Code as only being applicable to predatory birds. However, Fish and Game Code 3503 and 3513 are applicable to all birds and birds listed within the Migratory Bird Treaty Act (see Evidence impact would be significant section below).”*

This comment is noted. Upon review of this portion of the DEIR, the City proposes to make the following changes (shown in ~~strikethrough~~ and underline format). As such the regulatory setting has been updated for clarity and correctness per CDFW comments and recommendations.

DEIR pg. 3.4-19 Fish and Game Code §3503, 3503.5, 3513, 3800 - ~~Predatory Birds~~

The California Fish and Game Code provide protection for native birds, including their nests and eggs (Sections 3503, 3513, and 3800). These regulations prohibit all forms of take, including disturbance that causes nest abandonment and/or loss of reproductive effort. Raptors (i.e., eagles, falcons, hawks, and owls) are specifically protected under Fish and Game Code Section 3503.5. Additionally, Fish and Game Code 3503 and 3513 are applicable to all birds and birds listed within the Migratory Bird Treaty Act.

~~Under the California Fish and Game Code, all predatory birds in the order Falconiformes or Strigiformes in California, generally called “raptors,” are protected. The law indicates that it is unlawful to take, possess, or destroy the nest or eggs of any such bird unless it is in accordance with the code. Any activity that would cause a nest to be abandoned or cause a reduction or loss in a reproductive effort is considered a take. This generally includes construction activities.~~

This section has been revised and updated to provide clarity and correct information related to the regulatory setting. This change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update. The City appreciates these comments and looks forward to working with the CDFW as future development projects are proposed. This comment does not address the adequacy of the Draft EIR, and no further response is required.

The Commenter references DEIR pg. 3.4-23 (Impact Discussion) Impact 3.4-1 and states: *“Impact 3.4-1 includes a list of significant impacts such as direct mortality due to removal of trees with active nests and abandoned eggs or young and subsequent nest failure. Although the DEIR states that impacts to nesting birds could occur, specific mitigation measures to avoid take are not included.*

The commenter additionally states that:” *“Take of nesting birds, birds in the orders Falconiformes or Strigiformes, and migratory nongame bird as designated in the Migratory Bird Treaty Act is a violation of Fish and Game Code (§ 3503, 3503.5, 3513). The measures proposed for sensitive and special-status species (Impact 3.4-1) include habitat protection in particular areas of the City, but do not address all Project impact areas and the mitigation measures do not specifically mitigate for take of nesting birds, eggs, and young under Fish and Game Code.”*

The commenter recommends 2 Mitigation Measures be included to reduce this impact to a less than significant level as described below:

Mitigation Measure #1: Nesting Bird Surveys

If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15

for other raptors), a qualified biologist should conduct a minimum of two surveys for active nests of such birds within 14 days prior to the beginning of Project construction, with a final survey conducted within 48 hours prior to construction. Surveys should be conducted in all potential bird-nesting locations including grasslands, shrubs, and trees. However, species-specific survey protocols may be available and should be followed. Appropriate minimum survey radii surrounding the work area are typically the following: i) 250 feet for passerines; ii) 500 feet for small raptors such as accipiters; and iii) 1,000 feet for larger raptors such as buteos. Surveys should be conducted at the appropriate times of day and during appropriate nesting times.

Mitigation Measure #2: Active Nest Buffers

If the qualified biologist documents active nests within the Project area or in nearby surrounding areas, an appropriate buffer between the nest and active construction should be established. The buffer should be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist should conduct baseline monitoring of the nest to characterize “normal” bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist should monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman should have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active.

This comment is noted. The regulatory setting has been updated for clarity and correctness per CDFW comments and recommendations.

As the commenter is aware, adoption of the General Plan Update and certification of the Final EIR would not approve or otherwise entitle any development projects within Campbell, and no habitat modifications are proposed or would be approved. The details of individual projects and any potential site specific impacts are not known at this time and each would require a detailed project specific review. The Draft EIR includes projections for buildout of the Land Use Map, including future population levels, housing units, jobs, square footage of non-residential development, etc. See Chapter 2.0 of the Draft EIR. In instances where the Draft EIR references General Plan policies or actions that require project-level review of future development applications, the policies and actions identify the performance-based standards that must be used when analyzing future projects.

The General Plan includes a variety of policies and actions to protect local species, preserve habitats, and discourage the removal of important habitats throughout the planning area. Policies such as COS-4.5 seek to avoid the removal of large, mature trees that provide wildlife habitat. Additionally, specific to the commenter’s concerns, the General Plan requires project specific reviews to ensure all future projects are reviewed for impacts and that projects mitigate these impacts to the greatest extent feasible. One such example is Action COS-7.c that states “Where sensitive biological habitats have been identified on or immediately adjacent to a project site, the project shall include appropriate mitigation measures identified by a qualified biologist, which may include, but are not limited to the following:

- *Pre-construction surveys for species listed under the State or Federal Endangered Species Acts, or species identified as special-status by the resource agencies, shall be conducted by a qualified biologist;*
- *Construction barrier fencing shall be installed around sensitive resources and areas identified for avoidance or protection, and to reduce potential soil compaction in sensitive areas; and*
- *Pre-Construction training of contractors and sub-contractors shall be conducted”*

This represents a cohesive “Program Level” approach to ensuring that future development projects’ impacts are reduced to the greatest extent feasible through the implementation of performance-based measures at the time an application for entitlement is submitted. Project-level mitigation measures such as those required by Action COS-7c would ensure that all feasible mitigation measures would be implemented related to project level impacts to biological habitats and their associated species. The City is committed to protecting local species and conserving biological habitats throughout the planning area. As future development project are proposed the City will consider the applicability of mitigation measures, including those presented by the commenter.

The City has included broad and extensive policies and actions in the General Plan to ensure that biological species and habitats are protected, and that future projects that include sensitive biological habitats shall include appropriate mitigation measures identified by a qualified biologist. However upon further review of the General Plan policies and actions, the City agrees that additional policy guidance will provide for additional clarity for the enhancement of species and habitat protections for nesting birds. The following changes (shown in ~~strike through~~ and underline format), include an updated action (Action COS-7c), in order to provide more specificity and enforceability related to future projects impacts to nesting birds.

DEIR Pg. 3.4-26, 3.4-29, and 3.4-32

COS-7.c *Where sensitive biological habitats have been identified on or immediately adjacent to a project site, the project shall include appropriate mitigation measures identified by a qualified biologist, which may include, but are not limited to the following:*

- *Pre-construction surveys for species listed under the State or Federal Endangered Species Acts, Migratory Bird Treaty Act, or species identified as special-status by the resource agencies, shall be conducted by a qualified biologist;*
- *Provision of temporary or permanent buffers of adequate size (based on the specifics of the protected species) to avoid nest abandonment by nesting migratory birds and raptors associated with construction and site development activities.*
- *Construction barrier fencing shall be installed around sensitive resources and areas identified for avoidance or protection, and to reduce potential soil compaction in sensitive areas; and*
- *Pre-Construction training of contractors and sub-contractors shall be conducted by a qualified biologist to identify and avoid protected species and habitat.*

This updated General Plan action provides more specificity related to future projects’ potential impacts to nesting birds. No new impacts, or increased impacts are identified or would be

included from these comments or policy enhancements. The City appreciates these comments and looks forward to working with the CDFW as future development projects are proposed. This change does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update, and no further response is required.

B-7: The commenter provides information related to Environmental Data and reporting requirements for future surveys, and notes that the City must report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB).

These comments are to note specific reporting requirements. The City appreciates these comments and looks forward to working with the CDFW as future development projects are proposed, and future surveys are conducted. No further response is required.

B-8: The commenter provides information related to Environmental Document Filing Fees and notes that the payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089).

These comments provide information specifically related to CDFW filing fees. The City appreciates these comments and looks forward to working with the CDFW. No further response is required.

B-9: The commenter provides a conclusion to the comment letter.

These comments provide contact related information and a conclusion to the letter. The City appreciates comments from the CDFW. No further response is required.

Letter C

Fire Protection Services

The City of Campbell receives fire protection from the Santa Clara County Fire Department (SCCFD).

C-1

The Santa Clara County Fire Department (SCCFD), which was formed in 1947, provides suppression and dispatches emergency services for a 128.3-mile area. The SCCFD provides fire prevention, fire investigation, and all-hazard emergency services inclusive of structural and wildland firefighting, rescue and advanced life support emergency medical services (EMS), and special operations response to the residents and businesses in Los Altos Hills, Los Altos, Cupertino, Saratoga, Monte Sereno, Campbell, and Los Gatos. The Department also provides protection for the unincorporated areas adjacent to those cities. The City of Campbell contracts service through the SCCFD, and the Campbell Police Chief is responsible for SCCFD contracts.

The SCCFD maintains 15 fire stations, an administrative headquarters, a maintenance facility, and five other support facilities. Additionally, the SCCFD supplies executive leadership by contract to the Santa Clara County Office of Emergency Management, and the Santa Clara County 9-1-1 Communications Department. The SCCFD offers fire resources and emergency services that are divided into five major sections: Fire Suppression, Rescue and Emergency Medical Services, Fire Investigation, Special Operations, and Wildland Urban Interface.

The SCCFD operates two fire stations within the City of Campbell, as shown on Figure 3.13-1. Both stations are City-owned facilities.

- Campbell Fire Station, at 123 Union Avenue, Campbell
- Sunnyoaks Fire Station / McCormack Training Center, at 485 West Sunnyoaks Avenue, Campbell

Fire Suppression and Rescue

Emergency response falls under the operations division. SCCFD's fifteen fire stations are configured into three battalions. First-call equipment is deployed to deliver initial fire attack and EMS services for moderate and high-risk incidents with first unit arrival within 8 minutes. A standard first-alarm assignment for structure fires consists of two engine companies, a ladder truck company or a rescue and a Battalion Chief, for a total of 11 people. On working fires, the response is increased to three engine companies, one ladder truck company, a Hazmat and Breathing Support company, one rescue company, two Battalion Chiefs, a Safety Officer, and a Duty Investigator, total 25 persons.

A second-alarm would add another two engine companies, one truck company, one rescue company, and an additional Chief Officer; total staffing for two alarms is then 40 persons. Wildland-urban interface companies are trained and equipped to provide structure protection and initial attack on wildland incidents.

A brush alarm for vegetation fires in wildland/urban interface areas consists of two Type 1 engine companies, a Type 3 or Type 6 engine company, and a Battalion Chief, totaling 10 persons.

Daily emergency response staffing consists of 66 career fire personnel on a 24-hour shift assignment, using 19 pieces of first-line apparatus, plus three Battalion Chief command vehicles, and working from 15 fire stations.

The SCCFD aims to "improve survivability for victims of fire, hazardous materials release, entrapment or other crisis incidents" (SCCFD, 2020):

- First unit arrival at structure fires, vegetation fires, and other crisis incidents in urban areas in an average of 5:30 and under 7:50 ninety percent of the time.
- Contain structure fires to the room of origin at or above current, published, national average percentage.
- Keep vegetation fires to three acres or less ninety percent of the time.

The SCCFD has three ladder trucks, three rescue vehicles, and one urban search and rescue vehicle which employ specialized equipment designed to help personnel carry out technical rescues such as traffic collisions and industrial accidents. All emergency response personnel are trained in specialized rescue techniques. All SCCFD apparatus are equipped with a compliment of rescue tools scaled to their local hazards.

Fire Investigation

The Department provides fire investigation services by means of specially trained fire prevention division staff, whom are augmented by on-call personnel. The Department contracts with the Campbell Police Department for criminal investigation services in conjunction with the arson program, and in cooperation with other local law enforcement agencies. Conducting effective fire investigations results in information on the origin and cause of fire incidents, finds local fire problems, and supports prosecution of arsonists who nationwide cause billions of dollars in property damage, fraud, injuries, and death each year. In turn this supplies information to the SCCFD's Community Education and Risk Reduction Services program to better identify community risk and provide targeted fire safety education to the community.

Emergency Medical Services

The SCCFD provides first response Advanced Life Support (ALS) Paramedic level services to Campbell, Cupertino, Los Altos, Los Altos Hills, Los Gatos, Monte Sereno, Saratoga, and unincorporated areas of Santa Clara County. The EMS section, under the direction of the Deputy Chief of Operations, facilitates the delivery of high quality, effective patient care. The section is overseen by an Emergency Medical Services (EMS) Coordinator, who is a registered nurse, and a Firefighter Paramedic. The Department uses 19 fully equipped ALS fire apparatus daily, all staffed with a minimum of one Paramedic and two Emergency Medical Technicians (EMT). The Department maintains a Santa Clara County EMS Multi-Casualty Incident (MCI) supply trailer for large-scale emergency medical incidents and is a participant in Master Mutual Aid in the event of major disasters.

C-1
Cont

The EMS section is an active participant in the Santa Clara County EMS System, takes part in many of the EMS subcommittees, and sits as a representative on the EMS subsection of the Santa Clara County Fire Chiefs Association. The State of California's EMS Authority has recognized the Department as a Continuing Education Provider for both Paramedics and EMTs.

The SCCFD is a participant in Santa Clara County's Electronic EMS patient care record (PCR) system. The software is programmed to capture patient data upon receipt of a 911 call and provides enhanced capabilities for monitoring and evaluating patient care. The Department is committed to the protection of an individual's private patient healthcare information and maintains a comprehensive Privacy Practices Policy.

Santa Clara County EMS has a contract with a third-party ambulance transport provider for the ground transport of all patients. The delivery of exceptional EMS in a partially rural area involves the utilization of ALS helicopter service providers. The SCCFD routinely works with the various transport providers in order to rapidly transport critical patients from all locations to definitive care. Some areas covered by the department are so remote that an ALS helicopter is part of the initial EMS dispatch. The Department conducts extensive in-service training on a routine basis to insure that most up to date EMS skills, procedures, and practices are implemented and delivered to the citizens and visitors of Santa Clara County.

Special Operations Task Force / Haz-Mat

The mission of the SCCFD Special Operations Task Force is to improve emergency responses that are outside the scope of typical emergency calls through advanced training, teaching, and emergency responses in the district and adjoining agencies.

In addition to regular fire department training, Special Operations Task Force members are required to have the following training:

- Incident command and fire instructor training
- Technician and/or specialist-level training for rope rescue, confined space, trench, and structural collapse rescue incidents
- Hazardous Materials technician and/or specialist-level training with enhanced CBRNE component

Continued training includes:

- Weekly task force training and multi company training
- Participation in quarterly hazardous materials and technical rescue training exercises with countywide stakeholders.

The SCCFD Special Operations Task Force may be deployed to incidents based on incident scope and dispatch protocols, or by request of the incident command. USAR 85 is certified by Cal-OES Fire and Rescue Division as a Type-1 (Heavy) Urban Search and Rescue Company. Haz-Mat 72 is also certified by Cal-OES Fire and Rescue Division as a Type 1 Hazardous Materials Response Team. Each resource can be deployed

C-1
Cont

statewide to significant natural or human-caused incidents through the California Fire and Rescue mutual-aid system.

Several SCCFD Special Operations Task Force (SOTF) personnel are members of California Urban Search and Rescue Task Force 3, one of 8 national urban search and rescue task forces here in California, and a total of 28 such task forces nationwide. These task forces are deployed by FEMA to provide urban search and rescue support for national-level disasters. Team members have deployed to various hurricanes, floods, and earthquakes since SCCFD became a participating agency after the events of September 11, 2001.

C-1
Cont

Response to Letter C: Santa Clara County Fire Department (SCCFD).

C-1: The Santa Clara County Fire Department (SCCFD) provided a comment letter that included updated descriptions of Fire Protection Services within Campbell.

The City appreciates the comments and input provided by the SCCFD. The City has made text revisions to include Santa Clara County Fire Department (SCCFD) consistent with SCCFD comments. The changes (shown in ~~strike through~~ and underline format in Section 3.0 Errata) include information provided by SCCFD related to fire protection services on DEIR Page 3.13-1 in Section 3.13.1, Environmental Setting - Fire Protection Services.

DEIR Pg. 3.13-1 through 3.13-4 Section 3.13.1 Environmental Setting - Fire Protection Services.

~~The City of Campbell receives fire protection from the Santa Clara County Fire Department (SCCFD).~~

~~The Santa Clara County Fire Department (SCCFD), which was formed in 1947, provides suppression and dispatches emergency services for a 128.3-mile area. The SCCFD provides firefighting personnel and emergency medical service (basic life support) to the residents and businesses in Los Altos Hills, Los Altos, Cupertino, Saratoga, Monte Sereno, Campbell, and Los Gatos. The Department also provides protection for the unincorporated areas adjacent to those cities. The City of Campbell contracts service through the SCCFD, and the Campbell Police Chief is responsible for SCCFD contracts.~~

~~The SCCFD maintains 15 fire stations, an administrative headquarters, a maintenance facility, five other support facilities. The SCCFD offers fire resources and services that are divided into five major sections: Fire Suppression and Rescue, Fire Investigation, Emergency Medical Services, Special Operations Task Force / Haz-Mat, and Wildland Urban Interface.~~

~~The SCCFD operates two fire stations within the City of Campbell, as shown on Figure 3.13-1. Both stations are City owned facilities.~~

- ~~• Campbell Fire Station, at 123 Union Avenue, Campbell~~
- ~~• Sunnyoaks Fire Station / McCormack Training Center, at 485 West Sunnyoaks Avenue, Campbell~~

Fire Suppression and Rescue

~~The Fire Suppression Department is configured into three districts. First call equipment is deployed to deliver initial fire attack and EMS services within 7 minutes. A standard first alarm assignment for structure fires consists of two engine companies, a ladder truck company, a rescue or hazardous materials company and a Battalion Chief, for a total of 15 people. On working fires, the response is increased to three engines companies, one ladder truck company, a Hazmat and Breathing Support company, one rescue company, two Battalion Chiefs, a Safety Officer, and a Duty Investigator, totaling 25 persons.~~

~~A second alarm would add another two engine companies, one truck company, one rescue company, and an additional Chief Officer; total staffing for two alarms is then 40 persons.~~

~~Wildland-urban interface companies are trained and equipped to provide structure protection and limited initial attack on wildland incidents.~~

~~A brush alarm for vegetation fires in wildland/urban interface areas consists of two engine companies, a Type 3 engine and a Battalion Chief, totaling 9 persons.~~

~~Daily emergency response staffing consists of 70 career fire personnel on a 24-hour shift assignment, operating 19 pieces of first-line apparatus, plus three 3 Battalion Chief command vehicles, operating from 15 fire stations. In daily operations during declared "Fire Season," patrols function in tandem with ladder trucks during daytime hours. This means that during the summer months, when the probability of a brush fire is high, the truck and patrol vehicle go out on calls as a pair. This guarantees continuous coverage of the entire area served, should another response be required during an alarm.~~

~~The SCCFD aims to control emergency incidents that threaten lives, property, and the environment. The Department maintains the following three goals:~~

- ~~• Arrive at the scene of emergencies within five minutes of receipt of alarm, at least 90 percent of the time.~~
- ~~• Maintain "Confined Space - Operational Level" training for all Department responders.~~
- ~~• Maintain "Rescue Systems I" certification for truck and rescue personnel.~~

~~The SCCFD has four first-call ladder trucks and one rescue vehicle, which employ specialized equipment designed to carry out rescues such as traffic collisions and industrial accidents. All emergency response personnel are trained in specialized rescue techniques. All apparatus carry a compliment of rescue tools.~~

Fire Investigation

~~The Department is one of the few agencies in the Bay Area to staff full time fire investigator positions, augmented by on-call personnel. Investigation of fires provides information on the cause of local fire problems, which provides information to the local news media regarding fire safety education.~~

~~Arson Investigation provides for the apprehension of arsonists who cause billions of dollars in property damage, fraud and death each year. The Department also uses the AIRS program to track arson registrants/suspects and compile fire statistics. With local police agencies, the Santa Clara County Fire Investigation Unit track down many arson investigations, as they account for about 25% of fires. The SCCFD places a strong emphasis on quelling arson fires.~~

Emergency Medical Services

~~The SCCFD provides first response Advanced Life Support (ALS) Paramedic level services to Unincorporated Santa Clara County, Campbell, Cupertino, Los Altos, Los Altos Hills, Los Gatos, Monte Sereno, and Saratoga. An Emergency Medical Services (EMS) Coordinator and a Firefighter Engineer Paramedic, who report to the Battalion Chief of Operations, facilitate the delivery of high quality, effective patient care. The District operates 19 fully equipped ALS fire apparatus daily all staffed with a minimum of one Paramedic and two Emergency Medical Technicians (EMT). The Department maintains a Santa Clara County EMS Multi-Casualty Incident~~

~~(MCI) supply trailer for large-scale emergency medical incidents and is a participant in Master Mutual Aid in the event of major disasters.~~

~~The Department's EMS division is an active participant in the Santa Clara County EMS System, participates in many of the EMS subcommittees, and sits as a representative on the EMS subsection of the Santa Clara County Fire Chiefs Association. The State of California's EMS Authority has recognized the Department as a Continuing Education Provider for both Paramedics and Emergency Medical Technicians.~~

~~The District is a participant in Santa Clara County's Electronic EMS patient care record (PCR) system. The software is programmed to capture patient data upon receipt of a 911 call and provides enhanced capabilities for monitoring and evaluating patient care. The Department is committed to the protection of an individual's private patient healthcare information and maintains a comprehensive Privacy Practices Policy.~~

~~Santa Clara County EMS has a contract with a third party ambulance transport provider for the ground transport of all patients. The delivery of exceptional EMS in a partially rural area involves the utilization of ALS helicopter service providers. The Department routinely works with the various transport providers in order to rapidly transport critical patients from all locations to definitive care. Some areas covered by the department are so remote that an ALS helicopter is part of the initial EMS dispatch. The Department conducts extensive in-service training on a routine basis to insure the most up to date EMS skills, procedures, and practices are implemented and delivered to the citizens and visitors of Santa Clara County.~~

Special Operations Task Force / Haz-Mat

~~The mission of the SCCFD Special Operations Task Force is to improve emergency responses that are outside the scope of typical emergency calls through advanced training, teaching, and emergency responses in the district and adjoining agencies.~~

~~In addition to regular fire department training, all members are required to have the following:~~

- ~~● CSFM Fire Instructor 1A and 1B~~
- ~~● Confined Space Rescue~~
- ~~● Trench Rescue~~
- ~~● Low Angle Rescue~~
- ~~● Rescue Systems I and/or II~~
- ~~● CSTI Hazardous Materials Technician or Specialist~~
- ~~● Haz-Mat Safety Officer/All Risk~~

~~Continued training includes:~~

- ~~● Weekly Special Ops, multi company training~~
- ~~● Participation in the quarterly Hazardous Materials Countywide Refresher Training~~
- ~~● UASI Urban Shield Exercise/Competition and Participation (12 hours)~~

~~The SCCFD Special Operations Task Force may be deployed within the district when needed by Incident Command request of the Special Operations Task Force. Haz-Mat 72 is also recognized as an OES Type 1 resource for large WMD or large scale Haz-Mat events throughout the state.~~

Some Santa Clara County Fire Department Special Operations Task Force (SOTF) members have been attached to FEMA Task Force 3, local SWAT teams, or actively teach for private and public agencies. Some member deployments and SOTF deployments include:

- Hurricane Katrina—rescue and Haz Mat operations (2005)
- San Jose High Rise Rescue (2011)
- Santa Clara County City Six Flags Roller Coaster Rescue (2007)
- San Jose Downtown / AT&T 1,300-gallon Diesel Spill (2010)
- Santa Clara City/ CHP Bomb maker's facility (2013)
- Los Altos PG&E House Explosion (2002)
- Suspicious Package/ Envelope diagnostics at Campbell PD, Moffett Field, Google, eBay, Stanford and Apple (various years)
- Trench and steep terrain rescues (various years)

The City of Campbell receives fire protection from the Santa Clara County Fire Department (SCCFD).

The Santa Clara County Fire Department (SCCFD), which was formed in 1947, provides suppression and dispatches emergency services for a 128.3-mile area. The SCCFD provides fire prevention, fire investigation, and all-hazard emergency services inclusive of structural and wildland firefighting, rescue and advanced life support emergency medical services (EMS), and special operations response to the residents and businesses in Los Altos Hills, Los Altos, Cupertino, Saratoga, Monte Sereno, Campbell, and Los Gatos. The Department also provides protection for the unincorporated areas adjacent to those cities. The City of Campbell contracts service through the SCCFD, and the Campbell Police Chief is responsible for SCCFD contracts.

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standard first-alarm assignment for structure fires consists of two engine companies, a ladder truck company or a rescue and a Battalion Chief, for a total of 11 people. On working fires, the response is increased to three engines companies, one ladder truck company, a Hazmat and Breathing Support company, one rescue company, two Battalion Chiefs, a Safety Officer, and a Duty Investigator, total 25 persons.

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- First unit arrival at structure fires, vegetation fires, and other crisis incidents in urban areas in an average of 5:30 and under 7:50 ninety percent of the time.
- Contain structure fires to the room of origin at or above current, published, national average percentage.
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The SCCFD has three ladder trucks, three rescue vehicles, and one urban search and rescue vehicle which employ specialized equipment designed to help personnel carry out technical rescues such as traffic collisions and industrial accidents. All emergency response personnel are trained in specialized rescue techniques. All SCCFD apparatus are equipped with a compliment of rescue tools scaled to their local hazards.

Fire Investigation

The Department provides fire investigation services by means of specially trained fire prevention division staff, whom are augmented by on-call personnel. The Department contracts with the Campbell Police Department for criminal investigation services in conjunction with the arson program, and in cooperation with other local law enforcement agencies. Conducting effective fire investigations results in information on the origin and cause of fire incidents, finds local fire problems, and supports prosecution of arsonists who nationwide cause billions of dollars in property damage, fraud, injuries, and death each year. In turn this supplies information to the SCCFD’s Community Education and Risk Reduction Services program to better identify community risk and provide targeted fire safety education to the community.

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The SCCFD provides first response Advanced Life Support (ALS) Paramedic level services to Campbell, Cupertino, Los Altos, Los Altos Hills, Los Gatos, Monte Sereno, Saratoga, and unincorporated areas of Santa Clara County. The EMS section, under the direction of the Deputy Chief of Operations, facilitates the delivery of high quality, effective patient care. The section is overseen by an Emergency Medical Services (EMS) Coordinator, who is a registered nurse, and a Firefighter Paramedic. The Department uses 19 fully equipped ALS fire apparatus daily, all staffed with a minimum of one Paramedic and two Emergency Medical Technicians (EMT). The Department maintains a Santa Clara County EMS Multi-Casualty Incident (MCI) supply trailer for large-scale emergency medical incidents and is a participant in Master Mutual Aid in the event of major disasters.

The EMS section is an active participant in the Santa Clara County EMS System, takes part in many of the EMS subcommittees, and sits as a representative on the EMS subsection of the Santa Clara County Fire Chiefs Association. The State of California's EMS Authority has recognized the Department as a Continuing Education Provider for both Paramedics and EMTs.

The SCCFD is a participant in Santa Clara County's Electronic EMS patient care record (PCR) system. The software is programmed to capture patient data upon receipt of a 911 call and provides enhanced capabilities for monitoring and evaluating patient care. The Department is committed to the protection of an individual's private patient healthcare information and maintains a comprehensive Privacy Practices Policy.

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In addition to regular fire department training, Special Operations Task Force members are required to have the following training:

- Incident command and fire instructor training
- Technician and/or specialist-level training for rope rescue, confined space, trench, and structural collapse rescue incidents

Hazardous Materials technician and/or specialist-level training with enhanced CBRNE component

Continued training includes:

- Weekly task force training and multi company training
- Participation in quarterly hazardous materials and technical rescue training exercises with countywide stakeholders.

The SCCFD Special Operations Task Force may be deployed to incidents based on incident scope and dispatch protocols, or by request of the incident command. USAR 85 is certified by Cal-OES Fire and Rescue Division as a Type-1 (Heavy) Urban Search and Rescue Company. Haz-Mat 72 is also certified by Cal-OES Fire and Rescue Division as a Type 1 Hazardous Materials Response Team. Each resource can be deployed statewide to significant natural or human-caused incidents through the California Fire and Rescue mutual-aid system.

Several SCCFD Special Operations Task Force (SOTF) personnel are members of California Urban Search and Rescue Task Force 3, one of 8 national urban search and rescue task forces here in California, and a total of 28 such task forces nationwide. These task forces are deployed by FEMA to provide urban search and rescue support for national-level disasters. Team members have deployed to various hurricanes, floods, and earthquakes since SCCFD became a participating agency after the events of September 11, 2001.

This text change provides background information related to fire emergency services serving Campbell and does not involve any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by these comments, including this text update.



Letter D

October 27th, 2022

City of Campbell – Rob Eastwood / Stephen Rose / Planning Commission / City Council
70 N 1st Street
Campbell CA 95008

Dear Mr. Eastwood, Mr. Rose, Planning Commissioners, and Members of the City Council,

Thank you for your ongoing work on Campbell's Housing Element Update.

On behalf of CAMPBELL TECHNOLOGY PK LLC, we request that the Campbell Technology Park (635, 655, 675 and 695 Campbell Technology Parkway) be zoned for a minimum density of less than 25 units / acre, which would accommodate our desired 3-story townhome product across the 17-acre site. Our market research indicates that the location of the property does not lend itself to a higher density product type, such as a 4-story apartment building or "stacked flat" typology.

Economic feasibility of a housing redevelopment at our property is incrementally decreased as minimum density exceeds 25 units/acre. Additionally, we believe that setting a lower density will allow for a more suburban neighborhood that has been supported by many in the community.

We look forward to submitting a formal application for housing after the adoption of the Housing Element Update and Objective Design Standards in 2023.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Pasquinelli', is written over a light blue circular stamp.

Tim Pasquinelli

D-1

**Response to Letter D: Tim Pasquinelli - CONSIGLIARE - CAMPBELL TECHNOLOGY PK
LLC**

D-1: The Commenter requests that the Campbell Technology Park be zoned for a minimum density of less than 25 units/ acre, which would accommodate 3-story townhomes.

These comments are noted. These comments are specifically related to desired development standards and the zoning code. This request will be forwarded to the Planning Commission, and City Council for review and consideration. This comment does not address the adequacy of the Draft EIR, and no further response is required. No changes to the Draft EIR text are required.

Stephen Rose

From: Vikki Essert
Sent: Friday, September 23, 2022 10:52 AM
To: Sergio Lopez; Planning Division
Subject: Draft General Plan

Letter E

Good Morning everyone,

I have read through the draft general plan and overall am very pleased to see that, for the most part, it reflects the priorities and values that were important to the GPAC. I was especially glad to see the strong language encouraging the use of recycled water- personally, I hope it will be added to the household water system some day. I also appreciate the ideas for giving residents a sense of place- I hope the objective standards will support that without overly restricting architectural styles.

E-1

I would like to point out that in the section on projects close to Los Gatos Creek, it specifies creating "landscaped parkways" with no mention of native or drought tolerant plants, although these are mentioned extensively in other sections of the document. It seems appropriate to emphasize their use again here.

E-2

My biggest concerns have to do with the Hamilton Area Precise Plan. I don't know if it has been started, but that area is prime for development, and my fear is that projects will be approved before the plan is complete and the necessary infrastructure to make the 17/ Hamilton intersection safe for bikes and pedestrians with easy access to the lightrail will not be adequate.

E-3

In addition, since that intersection is already a "D", and the GP allows it to deteriorate even further if constructing the infrastructure is "unreasonably expensive" and the heavy traffic is "caused by adjacent jurisdictions", I believe it leaves an opening for developers to avoid building the kind of infrastructure that would make the area actually function.

Lastly, I want to say again that using units per acre is an obsolete way of determining density. FAR, Height, setbacks and open green space matter much more than the number of units in a building. I would also strongly encourage the City to pursue Federal, State, County and Corporate partnerships to create more housing that is affordable to the middle and low income population.

E-4

Vikki Essert

Response to Letter E: Vikki Essert

E-1: The Commenter provides an introduction to the comment letter.

This comment is introductory in nature and does not address the adequacy of the Draft EIR, and no further response is required.

E-2: The Commenter requests that native landscaping language be added to specific policy guidance related to landscaped parkways.

The General Plan Includes a variety of policies related to supporting native plantings and landscaping and these General Plan Policies are applicable throughout the city including any future landscaped parkways.

The City appreciates the comments and input provided by the commenter. These comments provide input related to various goals, policies, and actions in the General Plan and do not address the adequacy of the Draft EIR analysis. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

E-3: The Commenter references the Hamilton Area Precise Plan, the importance of safe infrastructure, and the potential for reduced LOS.

These comments provide input related to various future improvements and the Hamilton Area Precise Plan and do not address the adequacy of the Draft EIR analysis. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

E-4: The Commenter stated that the city should pursue new ways of determining density and intensity of development, and that the city should support affordable housing goals.

The General Plan uses standard density and intensity calculation consistent with other area jurisdictions and industry standards. Residential Density as stated in the *General Plan Guidelines* is “*applied differently from one jurisdiction to another, residential population density can best be expressed as the relationship between two factors: the number of dwellings per acre and the number of residents per dwelling.*” The General Plan uses this industry standard to provide consistence and clarity.

These comments provide input related to various opportunities for improvements and issues facing Campbell and the need to support affordable housing objectives. The City appreciates the comments and input provided by the commenter. These comments do not address the adequacy of the Draft EIR analysis. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

Letter F

To: Stephen Rose, Campbell Planning Dept.
 From: Julie Schaer, WVCWA and Vishakha Atre, SCVURPPP

11/1/2022

City of Campbell General Plan

Suggested changes to include GSI language

Page/Description	Current Language	Suggested Language or Comments
CD-6 - Actions in Support of Goal CD-2 (PDF page 72)	CD-2.a <i>As part of the development review process, ensure that projects incorporate sustainable design elements, such as passive solar design, energy-efficient features, water conservation measures, street trees, electric vehicle charging stations, and low impact development stormwater features to the extent feasible, such as prohibiting above ground treatment facilities.</i>	Unclear what “prohibiting above ground treatment facilities” means. LID/GSI facilities are above ground. Should LID be included with design elements “to the extent feasible”, when LID is required under a regulated project it is mandated per the MRP. CD-2.a <i>As part of the development review process, ensure that projects incorporate sustainable design elements, such as passive solar design, energy-efficient features, water conservation measures, street trees, electric vehicle charging stations, and low impact development stormwater features</i>
CSF -14 Actions in Support of Goal CSF-5 (PDF page 151)	Actions in Support of Goal CSF-5 CSF-5.a <i>Regularly review and update the City of Campbell’s Green Stormwater Infrastructure Plan</i>	CSF-5.a <i>Regularly review and update, as needed, the City of Campbell’s Green Stormwater Infrastructure (GSI) Plan.</i> Add the following text: <i>Integrate GSI features into street designs to protect stormwater quality, per the City’s GSI Plan and the Municipal Regional Stormwater NPDES Permit. GSI features typically include biotreatment areas in the form of stormwater curb extensions, stormwater planters, and stormwater tree filters, designed to treat stormwater runoff from adjacent roadways and sidewalks. Other systems, such as pervious pavement, may also achieve this objective.</i>
SU-3 Environmental and Resource Sustainability (PDF page 216)	Create a complete streets implementation guide to reflect General Plan complete street policies, including sidewalk standards, bike facility	Add the following text: <i>Integrate Green Stormwater Infrastructure (GSI) features into Complete Street designs to protect stormwater quality, per the City’s GSI Plan and the Municipal Regional Stormwater NPDES Permit. GSI features typically include</i>

F-1

Page/Description	Current Language	Suggested Language or Comments
	standards, Americans with Disabilities Act (ADA) requirements, lighting standards, and landscaping requirements	<i>biotreatment areas in the form of stormwater curb extensions, stormwater planters, and stormwater tree filters, designed to treat stormwater runoff from adjacent roadways and sidewalks. Other systems, such as pervious pavement, may also achieve this objective.</i>
Policies (PDF page 151)	CSF-5.2 Require all development projects to demonstrate how storm water runoff will be detained or retained on-site and/or conveyed to the nearest drainage facility as part of the development review process and as required by the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit.	CSF-5.2 Require all development projects to demonstrate how stormwater runoff will be detained or retained on-site and/or conveyed to the storm sewer facility as part of the development review process and as required by the <i>Municipal Regional Stormwater NPDES Permit</i> . Add the following text: <i>Consider incorporating GSI measures as a standard element in the design and implementation of various Public Works projects and programs</i>
T- 9 Actions in support of Goal T-4 (PDF page 57)	<i>T-4.a</i> Require developers to make public improvements related to their project to improve and enhance bicycle, pedestrian, and transit opportunities along the site’s frontage consistent with City policy.	Add the following text (italicized and underlined): Require developers to make public improvements related to their project to improve and enhance bicycle, pedestrian, and transit opportunities along the site’s frontage consistent with City policy, <u>including the installation of stormwater treatment measures, such as bioretention areas</u>
T-10 (PDF page 58)	<i>T-4.i</i> Design parking lots to minimize impacts on the street system by providing adequately sized driveways, sufficient queuing, and efficient circulation.	Add the following text: <u>Incorporate Green Stormwater Infrastructure (GSI) elements, such as infiltration and bioretention, into street projects to provide opportunities for stormwater collection and treatment, per the City’s GSI Plan.</u>
COS-19 BIOLOGICAL RESOURCES (PDF page 123)	COS-7.5. Encourage the use of water quality wetlands, biofiltration swales , watershed-scale retrofits, etc., where such measures are likely to be effective and technically and economically feasible.	Replace biofiltration swales with bioretention systems
COS-19, COS-7.6	. . . minimize impacts from Stormwater and urban runoff	. . . minimize impacts from Stormwater runoff
COS-20, COS-7.b	c.3 Stormwater Handbook, pollutants from non-point sources, incorporate “green” infrastructure	C.3 Stormwater Handbook, pollutants from Stormwater runoff, incorporate Green Stormwater Infrastructure (GSI)
COS-22, COS-7.j	Garbage areas consistent with C3 handbook	Handbook

F-1
Cont

Page/Description	Current Language	Suggested Language or Comments
Policy COS 8.8	Encourage and accommodate multipurpose flood control projects that incorporate recreation, resource conservation, preservation of natural riparian habitat, and scenic values of Campbell's drainages, creeks, and detention ponds. Where appropriate and feasible, the City shall encourage the use of water detention facilities for use as groundwater recharge facilities.	Where appropriate and feasible, the City shall encourage the use of LID facilities such as bioretention for use as groundwater recharge facilities.
Policy COS 8.9 p. SU-12	Maintain and enhance the health of the groundwater basin by encouraging new groundwater recharge opportunities, promoting the use of permeable surface materials and, providing ample areas of open space in order to decrease surface runoff and promote groundwater recharge, and through the use of other LID techniques, such as bioswales, where feasible.	Maintain and enhance the health of the groundwater basin by encouraging new groundwater recharge opportunities, promoting the use of permeable surface materials and, providing ample areas of open space in order to decrease surface runoff and promote groundwater recharge, and through the use of other LID techniques, such as bioretention, where feasible.
Policy COS 8-10	Support the use of on-site rainwater harvesting/catchment systems and small-scale recycled water systems for new and existing development.	
CSF-13, Stormwater and Drainage Section Goal CSF-5	Design and maintain attractive, efficient, and environmentally sound storm drain systems to accommodate runoff from existing and projected development and prevent property damage due to flooding	Attractive? Environmentally sound? Can something be added related to GSI?
CSF-13, CSF-5.3	Require all future development projects to analyze their drainage and stormwater conveyance impacts and either demonstrate that the City's existing infrastructure can accommodate increased stormwater flows, or make the necessary improvements to mitigate all potential impacts.	Can this language be updated to prioritize GSI/LID to reduce increased flows?
CSF-13, CSF-5.4	Applicable projects shall incorporate Best Management Practices (BMPs) and Low Impact Development measures (LID) to treat stormwater before discharge from the site. The facilities shall be sized to meet regulatory requirements.	Applicable projects shall incorporate Green Stormwater Infrastructure (GSI) and Low Impact Development measures (LID) to treat stormwater before discharge from the site. The facilities shall be sized to meet the Municipal Regional Stormwater NPDES Permit requirements.

F-1
Cont

Page/Description	Current Language	Suggested Language or Comments
CSF-14, CSF-5.8	Owners and operators of stormwater treatment facilities shall maintain those facilities and ensure they continue to be effective.	Confirm with Roger if this wording needs updating. Does it cover where city maintains facilities.
CSF-14, CSF-5.b	Drainage improvement as identified in GSI Plan	Confirm GSI Plan identifies "drainage improvement projects"
CSF-14, CSF-5.c	Continue to review development projects to identify potential stormwater and drainage impacts and require development to include measures to ensure that off-site runoff is not increased beyond pre-development levels during rain and flood events.	Simplify wording. Continue to review development projects to identify potential stormwater and drainage impacts and require development to meet requirements for GSI and LID per the Municipal Regional Stormwater NPDES Permit requirements.
CSF-14, CSF-5.d	Require project designs to minimize drainage concentrations, minimize impervious coverage, utilize pervious paving materials, utilize low impact development (LID) strategies, and utilize Best Management Practices (BMPs) to reduce stormwater runoff	Require project designs to minimize drainage concentrations, minimize impervious coverage, utilize pervious paving materials, utilize low impact development (LID) strategies, and Green Stormwater Infrastructure (GSI) to reduce stormwater runoff
CSF-14, CSF-5.e	Identify which stormwater drainage facilities are in need of repair and address these needs through the City's Capital Improvement Program.	Identify stormwater facilities are in need of repair and address these needs through the City's Capital Improvement Program.
CSF-14, CSF-5.f	Continue to implement a comprehensive municipal stormwater pollution-prevention program in compliance with requirements of the Santa Clara Valley Urban Runoff Pollution Prevention Program (SCVURPPP) and the C.3 Stormwater Handbook.	Continue to implement a comprehensive municipal stormwater pollution-prevention program in compliance with Municipal Regional Stormwater NPDES Permit requirements.
CSF-14, CSF-5.g	Work cooperatively with local, State, and Federal agencies to comply with regulations, reduce pollutants in runoff, and protect and enhance water resources in the Santa Clara Basin through implementation of the Santa Clara Valley Urban Runoff Pollution Prevention Program.	Work cooperatively with local, State, and Federal agencies to comply with regulations, reduce pollutants in runoff, and protect and enhance water resources in the Santa Clara Basin through implementation of the Municipal Regional Stormwater NPDES Permit requirements.
SA-5, Goal SA-2	Reduce risks to human life, property, and public services associated with flooding	Reduce risks to human life, property, environment and public services associated with flooding

F-1
Cont

Page/Description	Current Language	Suggested Language or Comments
SA-5, SA-2.2	Require all development projects requiring a building permit to demonstrate how storm water runoff will be detained or retained on-site, treated, . . .	Could be simplified, i.e. meet LID and GSI requirements. Stormwater (one word)
SA-5, SA-2.5	Encourage and accommodate multipurpose flood control projects that incorporate recreation, resource conservation, preservation of natural riparian habitat, and scenic values of Campbell’s drainages, creeks, and detention ponds. Where appropriate and feasible, the City shall encourage the use of water detention facilities for use as groundwater recharge facilities.	Encourage and accommodate multipurpose flood control projects that incorporate recreation, resource conservation, preservation of natural riparian habitat, and scenic values of Campbell’s drainages, creeks, and detention ponds. Where appropriate and feasible, the City shall encourage the use of Green Stormwater facilities for use as groundwater recharge facilities.
SA-6, SA-2.6	Encourage flood control measures identified within the Conservation and Open Space Element such as bioswales, and permeable materials that enhance natural drainage features, vegetation, and natural waterways, while still providing for adequate flood control and protection.	Update language: Bioretention instead of bioswales

F-1
Cont

Response to Letter F: Julie Schaer, WVCWA and Vishakha Atre, SCVURPPP

F-1: The Commenter provides a variety of suggested changes to the General Plan policy document related to incorporating Green Stormwater Infrastructure (GSI) language.

The City appreciates the comments and input provided by the commenter. The City has reviewed these comments and has made various revisions to the General Plan Policy Document to include updated language related to GSI. This comment specifically addressed General Plan policy language and does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

Letter G

Stephen Rose

From: Liz
Sent: Friday, October 28, 2022 5:00 PM
To: Stephen Rose
Subject: General Plan comments

1. Please correct all references to PGE as power supply. PGE provides gas. PGE provided transmission and distribution only. Silicon Valley Clean Energy provided electric power generation to 95% of Campbell residents and businesses. The Greenstart power is 100% carbon free and 50% renewable; Greenprime is 100% carbon free and 100% renewable.
2. Please clarify the term "action". It is the city's responsibility or the developer/homeowner? Who pays for the action items? When are they applicable?

| G-1

| G-2

Liz

Pardon the brevity and typos

Response to Letter G: Liz Gibbons

G-1: The Commenter requests the DEIR correct references to PGE as the power supplier to Campbell and notes that PGE provides gas, transmission and distribution only. Silicon Valley Clean Energy provides electric power generation to 95% of Campbell residents and businesses. The Greenstart power is 100% carbon free and 50% renewable; Greenprime is 100% carbon free and 100% renewable.

As stated on DEIR Pg. 3.7-25 the City of Campbell is also a member agency of the Silicon Valley Clean Energy (SVCE). In late 2016, the Campbell City Council voted to enroll the City's municipal electricity accounts in Silicon Valley Clean Energy's optional GreenPrime program starting April 2017. The electricity to run City-owned facilities, parks, and streetlights, comes from 100% renewable sources like wind and solar. The SVCE program is also available to Campbell residents and business.

The Silicon Valley Clean Energy program buys and/or generate power, but PG&E continues to deliver grid electricity over existing power lines, maintain the lines and provide customer service. Programs such as the Silicon Valley Clean Energy put renewable sources of electricity into the grid.

The City appreciates the comments and input provided by the commenter. The City has reviewed these comments and has made revisions to the DEIR related to adding additional information relating to the SVCE program. The City proposes to make the following changes to the DEIR to add additional references and information related to Silicon Valley Clean Energy on DEIR Page 3.7-37. (shown in ~~strikethrough~~ and underline format).

DEIR Page 3.7-37: For example, PG&E is responsible for the mix of energy resources used to provide electricity for its customers, and it is in the process of implementing the Statewide Renewable Portfolio Standard (RPS) to increase the proportion of renewable energy (e.g. solar and wind) within its energy portfolio. However, community choice programs such as the Silicon Valley Clean Energy provide power generation for Campbell residents and businesses by supplying grid power with renewable and carbon free choices and include the following tier structures: Greenstart power 100% carbon free and 50% renewable, and Greenprime 100% carbon free and 100% renewable.

This comment does not involve or identify any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. Section 3.0 Errata presents all text changes warranted by comments, including this text update.

G-2: The commenter requests that the City please clarify the term "action". Is it the city's responsibility or the developer/homeowner? Who pays for the action items? When are they applicable?

DEIR Page 2.0-10 described Goals, Policies, and Actions. "An action is an implementation measure, procedure, technique, or specific program to be undertaken by the City to help achieve a specified goal or implement an adopted policy. The City must take additional steps to

2.0 COMMENTS ON DRAFT EIR AND RESPONSES

implement each action in the General Plan. An action is something that can and will be completed.

In some instances, an action may be implemented by a developer or homeowner, in other instances, an action may be implemented by the City. This comment is related to the General Plan. No changes to the Draft EIR text are required.

Letter H

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From: Stacie Wolny
Sent: Thursday, October 27, 2022 8:52:44 PM
To: Stephen Rose <stephenr@campbellca.gov>
Cc: Stacie Wolny
Subject: Campbell General Plan dEIR comments

Stephen Rose, Senior Planner
City Hall 70 N. First St.
Campbell, CA 95008
stephenr@campbellca.gov

Thank you for the opportunity to comment on the draft environmental impact report for Envision Campbell General Plan and Housing Element Update, SCH: 2022030566.

As you will see, my comments mainly (but not entirely) revolve around how we think about our natural landscape, and how important it is for us to move away from lawns and exotic vegetation, and bring back the beautiful, resilient ecosystems that have been adapting to thrive in this Mediterranean climate for thousands of years. This EIR covers many different aspects of environmental quality, and our landscaping choices affect most of them, from hydrology to aesthetics to noise to recreation. Embracing locally-native landscaping does all of these things that would improve the environmental quality of Campbell significantly, and on a large scale:

- Reduce air pollution from mowers and leaf blowers.
- Reduce noise pollution from mowers and leaf blowers.
- Reduce energy use from mowers and leaf blowers.
- Reduce water pollution from fertilizer/pesticide/fungicide lawn treatment runoff.
- Reduce water consumption.
- Increase groundwater recharge, through lower evapotranspiration rates and increased infiltration ability.
- Increase biological resources and landscape resilience, both through direct restoration of plant species, and

2.0 COMMENTS ON DRAFT EIR AND RESPONSES

indirect support of pollinators, birds, and the whole web of life that has evolved here together, with native plants as the foundation.

- Build coherent local visual character. People travel to parks to be with grand Oaks and the wonderful wildflowers and ecosystems that they support. These could be in their own yard, on their own street, and in the city parks their children play in.

- Educate residents about the place we live. Teach everyone to respect it, and what it means to become stewards of home. This is the most important thing that we can possibly do.

To support this, I highly encourage you to learn about the historical ecology of Campbell (<https://www.sfei.org/scvheproject>), and get on board with San Francisco Estuary Institute's Re-Oaking Silicon Valley initiative (<https://www.sfei.org/documents/re-oaking-silicon-valley>).

Detailed comments follow.

Stacie Wolny
1776 Regina Way, Campbell
stacie.wolny@gmail.com

Table ES-1: Isn't it fascinating that none of the alternatives make our environment significantly better - why is that? Are we able to envision a future where we're making our little piece of the world cleaner, healthier, greener and more beautiful instead of worse? This whole document reads as essentially business as usual. Even though business as usual has created a "community" that has gotten almost impossible for the average person to afford, where neighbors don't know each other, it's never quiet because of noise pollution, never dark because of light pollution, and the landscape is an unnatural construct, devoid of local character, ecological benefit, and respect for the place we live.

Table 2.0-1: Seriously, *reducing* Open Space? Absolutely not. We need more open space, and more accessible open space for everyone. Looking at Figure 2.0-2, there are several large areas (northeast and northwest corners, as well as around Westmont/Hacienda) that have basically no open space within easy walking distance. Surely you're aware of the copious and increasing body of understanding of how green space positively impacts so many facets of life, from mental and physical benefits, to stormwater infiltration and urban cooling effects. And if these parks are full of native trees and other plants, they can also be critical pieces of habitat, which also provide education and connection with nature for us and our children, which we desperately need to kindle.

Table 2.0-3: Ah, the delusion of endless growth, couched as "new growth potential", as if more concrete, traffic, noise, resource use and pollution were a good thing.

Impact 3.1-4: General Plan implementation could result in the creation of new sources of nighttime lighting - I disagree that creating more light pollution is "less than significant". As it is, it is never actually dark here because of light pollution. Street lights are bad enough (Campbell should follow Saratoga's lead in refusing to have them), along with so many homes and commercial centers blaring bright lights all night long. Light pollution interferes with human melatonin production, disrupting our sleep (<https://sitn.hms.harvard.edu/flash/2020/i-cant-sleep-can-you-turn-off-the-lights/>). It causes problems for migratory birds, who go off course and smash into buildings (<https://www.audubon.org/lights-out-program>). It uses so much energy unnecessarily, which relates to **Impact 3.7-2**. And it keeps us all from seeing the stars.

H-1
Cont

H-2

H-3

H-4

H-5

Do you want our children to grow up seeing the wonder of stars, planets and the galaxy? Then decrease light pollution, don't increase it. As I have painfully come to know from my neighborhood, every single light left on all night long matters.

H-5
cont

Impact 3.10-4: Y'know what's displacing substantial numbers of existing people? The insane cost of housing, which is fueled by greed, yet somehow allowed to continue. I am furious and baffled that the El Paseo de Saratoga development nearby seems to be proud of including 10% "affordable" housing. So the other 90% is unaffordable? That's just shameful. And even that "affordable" housing is not affordable to the majority of us. Any new housing should be affordable for the average, say, school teacher, waiter, nurse, or other "essential worker" that we all suddenly became aware of in the past 2 years. The overpaid techies and housing speculators who are buying up all these homes aren't essential, they're ruining the entire Bay Area, and we should stop allowing that to happen.

H-6

Section 3.1 Aesthetics and Visual Resources and Impact 4.1: Cumulative degradation of the existing visual character of the region: What visual character? Campbell doesn't have any notable character. Visually, it's a monotony of paved suburbs decorated by a random mishmash of completely unnatural and inappropriate landscaping, mostly lawns and other plants from half way 'round the world, just like every other town around. There is neither "vividness" nor "unity" to it at all. Have you seen the San Francisco Estuary Institute's Western Santa Clara Valley Historical Ecology Study (<https://www.sfei.org/scvhproject>)? Before Campbell was paved over with suburbs, before Campbell was planted with orchards, for thousands of years it was Oak savanna, Oak woodlands and chaparral (see SFEI_WSCV_map.jpg attached to this email). Since I live in California, I want my neighborhood to look like California. Imagine if Campbell's landscape was still full of gorgeous Valley Oaks, manzanitas, native grassland, and the fantastic diversity of species that these native habitats support - now *that* would be unique, local visual character. I strongly recommend looking at SFEI's Re-Oaking Silicon Valley initiative (<https://www.sfei.org/documents/re-oaking-silicon-valley>), which highlights "how the history and ecology of the Silicon Valley landscape can be used as a guide to plan more ecologically-resilient cities in the Bay Area" and make this a core part of any landscaping policy and choices that are made by the city of Campbell.

H-7

Page 3.1-4 "The city's open space, parks and public facilities, especially multi-use pathways and trails, are major contributors to the physical connection of Campbell and provide linkages between residences, schools and commercial and employment centers." What about wildlife linkages? They could be that too, if we'd design them that way.

H-8

"They are a focal point for community involvement and are well-known landmarks that provide a sense of community identity and pride. These parks and facilities increase the attractiveness of the city's residential neighborhoods and business districts with their well-maintained landscaping..." Honestly, our parks have rather the opposite effect on me. I find it both sad and incomprehensible that Campbell chooses "well-maintained" lawns and exotic vegetation over natural-looking native habitat, and rejoice when I encounter one of the few old Valley Oaks, Coast Live Oaks or Sycamores that still stand strong. Our children could be immersed in real, complex, fascinating, diverse ecosystems, instead of being trained to continue the colonial insistence, so thoroughly infused into American consciousness, that everything everywhere should be manicured lawns and roses.

Page 3.1-5 "Stationary sources of nighttime light include structure illumination, interior lighting, decorative landscape lighting, security lighting, and streetlights... This ambient light environment can be accentuated during periods of low clouds or fog." Can be? It's never dark here, doubly so with clouds, the light pollution reflecting off of them is horrible at night. We should be seriously reducing all of the "landscape lighting,

H-9

2.0 COMMENTS ON DRAFT EIR AND RESPONSES

security lighting, and streetlights" that contribute to light pollution. Doesn't anyone else want to sleep well, save money, or see the stars? "Isolating impacts of particular sources of light or glare is therefore not appropriate or feasible for the Project." I disagree. Campbell can and should create much more stringent requirements for both homes and commercial centers that decrease light pollution.

H-9
cont

Page 3.1-7 "The Streetscape Standards require Chinese Pistache (*Pistacia chinensis*) as street trees for the section of Winchester Boulevard within the Plan Area." Um, you do realize that we live in California, not China, don't you? So I want my neighborhood to look like California, with Oaks and other locally-native plants, not look like China. If we lived in the place in China where *Pistacia chinensis* is native, then I would welcome it, but we do not, we live where *Quercus lobata* and *Quercus agrifolia* are native, and are keystone species. Along with Sycamores, Elderberries, and a large variety of other plants that have lived here for thousands, if not millions of years. How the heck can anyone think that it's somehow better to line our streets with plants from anywhere other than here? Whatever the bureaucratic, short-sighted reasons are, they entirely miss the point of being good environmental stewards (which is one of your "core guiding principles") and respecting the place we live. The Streetscape Standards should be changed to only include native species, and support the restoration of native ecosystems that have been largely destroyed by the existence of Campbell.

H-10

Impact 4.4: Cumulative loss of biological resources, including habitats and special status

species - The main reason that this is "less than cumulatively considerable" is because most of the natural habitats have already been destroyed in the past few hundred years. What if we had a goal to be good stewards of this land? Then our challenge should be not only planning to avoid further loss, but planning to restore habitat and special status species. We can do this, even in our currently-fragmented city, by changing the landscaping culture. The city of Campbell should set a good example by mandating that government land may only be planted with locally native, and condition-appropriate species, especially Valley and Coast Live Oaks. Then we should be doing everything we can to teach homeowners about the place they live, and encourage everyone to use native plants and landscaping methods that are quiet, non-polluting, water-saving and soil-building. If we bring back the native plants and healthy soil, biodiversity will start to increase as well. Can you imagine neighborhoods where stately Oaks shade homes and fill their role as a keystone species, where fields of wildflowers and pollinators replace monoculture, ecologically useless, water-wasting lawns? Where creeks are lined with Willows and Sycamores again?

H-11

General comments on the Community Design Element Policies:

- **CD-2.6** Encourage the expansion of the city's urban forest canopy: Yes, absolutely agreed that we should have more urban forest, and all of it should be native species.

- **CD-1.4** "...site planning criteria that will add design excellence, visual quality and interest to the community.": What about ecological benefit? I'm so tired and frustrated of seeing development after development planting the same 10 exotic species. There should be a requirement to use native species, and landscape for restoration and ecological benefit. There is much more "visual quality and interest" in a landscape covered in a diversity of local flora, and their attendant pollinators, butterflies, hummingbirds and other life.

H-12

- **CD-2.3**: "...to reinforce a sense of the natural environment..." The "natural" environment for this place is Oak woodland, savanna and chaparral. If this is actually a design element, then these are the natural environments that we should be reinforcing. Again, see the San Francisco Estuary Institute's Western Santa Clara Valley Historical Ecology Study (<https://www.sfei.org/scvheproject>).

Cultural Resources (section 3.5): I fully support consultation with local tribes on any matter that may be

H-13

important to them. They were here first, and we are living on (and continuing to disrespect) their ancestral land. I would also like to see more education around the Tamien Nation, teaching everyone about the real history of the missions, land theft, genocide, and attempted cultural obliteration carried out by early Spaniards and Americans, which continues to this day. One important modern facet of this is our stubbornly willful ignorance of the natural landscape here (which yes, I'm banging on about, because it's important in so many ways, just ask the Tamien people). Restoring native ecosystems here can serve as a small piece of recognition and reparation. What if the members of the Tamien Nation were respectfully invited to design the landscape of our parks, other city land, and even new developments? That could be a first, small step to support them in reconnecting with the land that they've stewarded for ten thousand years.

H-13
Cont

Greenhouse Gas Emissions, Climate Change & Energy (Section 3.7)

- "The City of Campbell does not have a Climate Action Plan". Why not?
- I would like to see Campbell encouraging solar installations on all new building construction, and mandating them on city buildings.
- Gas mowers and blowers should be banned. (Really, we should be encouraging/mandating landscaping that doesn't "require" mowers and blowers in the first place.)
- All of the excessive nighttime lighting also ultimately produces GHGs, and we can make policy to reduce that.
- "In late 2016, the Campbell City Council voted to enroll the City's municipal electricity accounts in Silicon Valley Clean Energy's optional GreenPrime program starting April 2017. The electricity to run City-owned facilities, parks, and streetlights, comes from 100% renewable sources like wind and solar." Hooray for that!
- I'm happy to see bicycle lanes being added and improved over the past year or two.
- COS-8.7-.10: Yes to improving water use in every way we can! Yet again, eliminating lawns would be so useful. How can we change the colonial-legacy lawn culture around here?

H-14

Hydrology

I'm surprised to see climate change mentioned exactly once in the Hydrology chapter, despite the fact that climate change already is having a significant impact on our water supply. This seems like something that should definitely be taken into account for planning future land use, and is an important omission.

H-15

Page 3.9-15 mentions Chapter 9.146 of the Campbell Municipal Code (Water Efficient Landscape Regulations). I'm reading through this, and applaud many of these points:

- "(c) Landscapes that are planned, designed, installed, managed and maintained with the watershed based approach can improve California's environmental conditions and provide benefits and realize sustainability goals. Such landscapes will make the urban environment resilient in the face of climatic extremes. Consistent with the legislative findings and purpose of the Ordinance, conditions in the urban setting will be improved by:
- (1) Creating the conditions to support life in the soil by reducing compaction, incorporating organic matter that increases water retention, and promoting productive plant growth that leads to more carbon storage, oxygen production, shade, habitat and esthetic benefits.
 - (2) Minimizing energy use by reducing irrigation water requirements, reducing reliance on petroleum based fertilizers and pesticides, and planting climate appropriate shade trees in urban areas.
 - (3) Conserving water by capturing and reusing rainwater and graywater wherever possible and selecting climate appropriate plants that need minimal supplemental water after establishment.
 - (4) Protecting air and water quality by reducing power equipment use and landfill disposal trips, selecting recycled and locally sourced materials, and using compost, mulch and efficient irrigation equipment to prevent erosion.

H-16

(5) Protecting existing habitat and creating new habitat by choosing local native plants, climate adapted non-natives and avoiding invasive plants. Utilizing integrated pest management with least toxic methods as the first course of action."

But... Have you actually seen people's yards? I see no evidence whatsoever that these objectives are being strongly pushed, much less achieved. I'm constantly seeing people install new turf, refuse to stop watering lawns even in the middle of a massive drought, spray all sorts of toxins, make tons of noise and air pollution mowing and blowing every week, which also removes all of the organic matter that would contribute to healthy, living soil... And I don't think that most of my neighbors (or their landscape people, or the people doing landscape in new commercial development) have a clue about how healthy soil works, or could name a single native plant (aside from Redwood) if you paid them, much less design landscape to support healthy soil and create new habitat. So much good would come if all of this changed, and we actually were improving soil, reducing pollution and creating new habitat with every single new landscaping installation. Please push these guidelines much harder!

H-16
cont

Page 3/9-21-22: "The majority of development allowed under the General Plan would be within areas currently developed with urban uses and the amount and type of runoff generated by various future development and infrastructure projects would be similar to existing conditions. However, new development and infrastructure projects have the potential to result in increases in the amount of impervious surfaces throughout Campbell. Future increases in impervious surfaces would result in increased urban runoff, pollutants, and first flush roadway contaminants, as well as an increase in nutrients and other chemicals from landscaped areas. These constituents could result in water quality impacts to onsite and offsite drainage flows to area waterways." New developments should not be creating runoff and pollutants "similar to existing conditions". If they are new, they should be using better materials and methods, like pervious surfaces and no-pollution landscaping, not business as usual methods that cause runoff and pollution. COS-7.b says as much: "Continue to require new development and infrastructure projects to incorporate the standards and requirements contained in the Santa Clara Valley Urban Runoff Pollution Prevention Program C.3 Stormwater Handbook to ensure that Low Impact Development (LID) measures are incorporated into site designs to reduce pollutants from non-point sources, incorporate "green" infrastructure, and encourage greater use of permeable paving surfaces."

H-17

Table 3.9-3: Santa Clara Subbasin Managed Recharge Facility Summary states that a portion of our groundwater comes from the State Water Project (SWP) and Central Valley Project (CVP). I disagree that the potential impact is "less than significant" when we're already stealing water from elsewhere in the state to recharge our aquifers and sate our excessive water use. Just like most places in California, we are living way beyond our local water budget, in blissful, willful ignorance. Just the fact that we are living beyond our budget is significant, and any addition to that is even more so. It is not acceptable to say that we will just import more water from elsewhere! And it's becoming increasingly hard to do so anyway. Rivers need water, other aquifers need water, fish need water, ecosystems need water. We need to learn to live within our local water budget.

H-18

Table 3.10-5: Regional Housing Needs Allocation: First, it's fascinating that "above moderate income" has the largest number of "needs". There is such a vicious cycle between high housing prices requiring higher income, and higher incomes pushing housing prices up. We absolutely do not need most of the housing to be for "above moderate income" people! They have enough options already, and are making the place unliveable for the rest of us. We need to stop catering to the rich, and make all new housing affordable for the "very low" to "low" income folks (and exactly what income values define each of these categories? this isn't listed in this dEIR and should be) and keep the "above moderate income" people from buying it up and flipping it for profit.

H-19

Noise

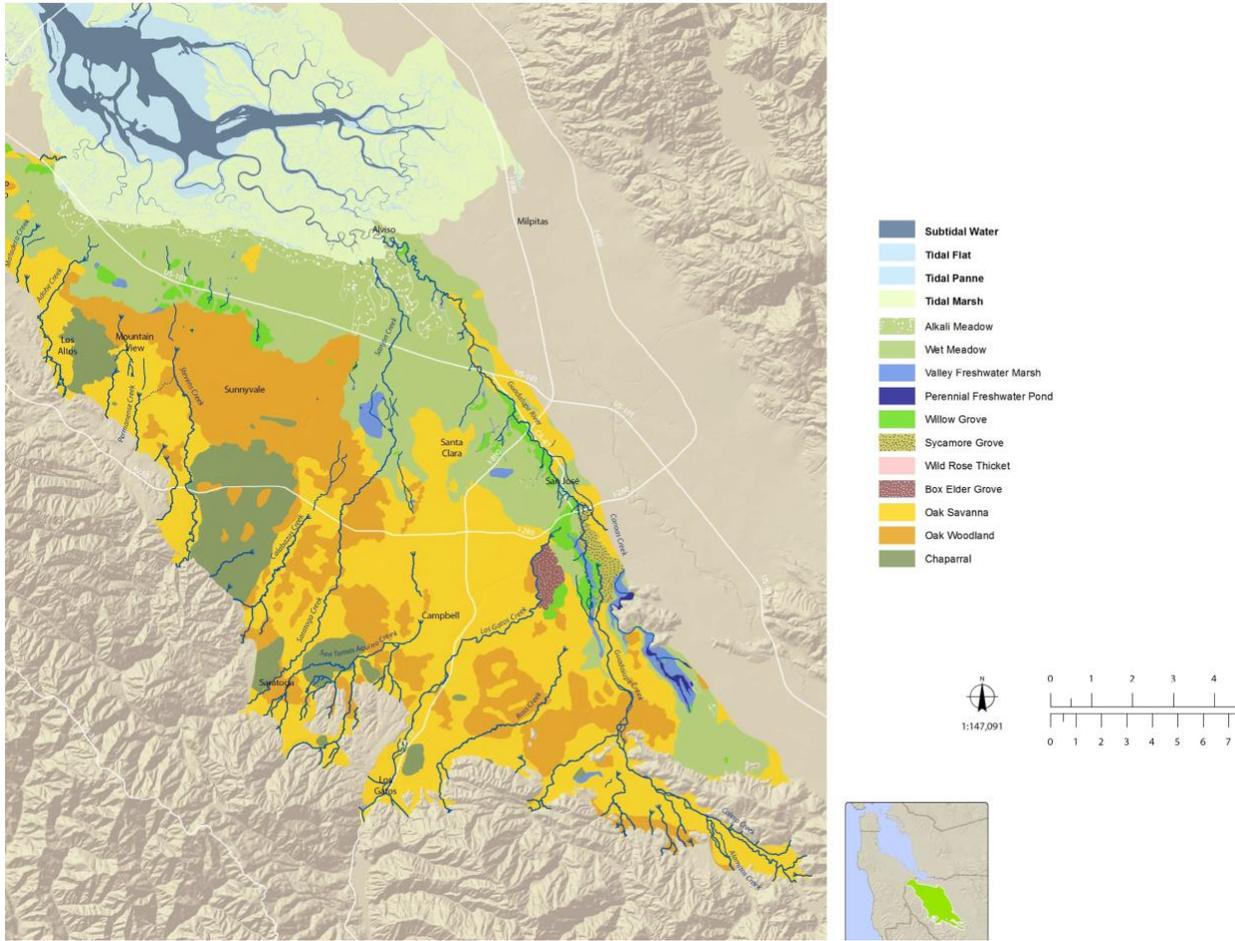
Table 3.12-2: Predicted Existing Traffic Noise Levels (2016) - I'd like to know if this analysis takes into account shifting weather patterns. I live on Regina Way, and when the wind blows from the north we can hear relatively little highway noise. But when the wind blows from the south, it sounds like the highway is in our back yard. Some nights I need to wear earplugs to sleep, even with all of the windows closed, it's horrible. | H-20

Page 3.12-13: So how do lawn mowers and leaf blowers figure into these noise thresholds? How the heck are they allowed? They are incredibly, annoyingly loud, are not at all necessary, and are mainly used because people continue to keep completely inappropriate landscaping. | H-21

Strategy CNR-10.1i: Vehicle Noise Reduction: Why doesn't this include limits on how loud individual vehicles can be? It seems like very few minutes there's an obnoxiously, often intentionally, loud vehicle driving within earshot, even sometimes waking me up in the middle of the night. Again, why are these legal? Especially if we are trying to limit noise pollution in our neighborhoods. | H-22

Table 3.12-8: Significance of changes in noise exposure: I'm afraid that this leads to a steadily-increasing creep of ambient noise, because we justify it as only 1.5dB more than last time, and then another 1.5dB more next time, and another... Related, with Table 3.12-11, I completely disagree that adding 2.1 or 3.2dB of noise is not significant, similarly incremental additions of noise pollution over the years have already added up to 50-65dB, and this proposal will push some over the 65dB limit that is supposedly (but isn't really for conscious people who live there) acceptable. | H-23

As it is, my little suburban street sounds like the highway is in our back yard half the days of the year because of poor highway design. As it is, every few minutes an idiot drives an intentionally-loud vehicle down the street, forcing that noise pollution into our soundscape at all hours. As it is, mowers and leaf blowers destroy our peace many times a day, every day. It is hardly ever quiet here. Any city plan should be taking measures to actively decrease noise pollution through design, noise-reduction policy, and no-noise landscaping policy.



Response to Letter H: Stacie Wolny

H-1: The Commenter provides an introduction to the letter and references a variety of opportunities to improve the city.

This comment is noted. This comment is introductory in nature and does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-2: The Commenter references Table ES-1 and notes that none of the alternatives make our environment significantly better.

This comment is noted. This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-3: the commenter references Table 2.0-1: and states concerns about, and the importance of, open space.

As described Under Response B-5 map errors have been corrected to include Open Space along the creek corridor in the northern portion of the city. This results in the addition of approximately 4.27 acres of OS along this corridor. Additionally, along Union Ave (APN 412-28-049) the city has re-designated 1.26 acres of HDR to OS land uses.

One 2.17 acre parcel within the city (APN 404-07-033) that currently includes water district utilities facilities has been redesigned from OS to MDR to support housing objectives. Additionally, one Pacific Gas and Electric utility parcel (APN 288-01-022) has been re-designated from OS to I (Institutional) to be consistent with onsite utility uses.

This comment is noted. This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-4: The Commenter references Table 2.0-3. and references it as “delusional endless growth”.

This comment is noted. DEIR Table 2.0-3 includes “Potential New Growth In Planning Area Over Existing Conditions”. The Table assumes a 2040 buildout year. This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to

the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-5: The Commenter references Impact 3.1-4 and disagrees that creating more light pollution is "less than significant" and notes that it is never actually dark here because of existing light pollution.

EIRs address a Project's impact potential as it relates to the existing environmental condition. As described in DEIR Impact 3.1-4, nighttime lighting impacts would be most severe in areas that do not currently experience high levels of nighttime lighting. Increased nighttime lighting can reduce visibility of the night sky, resulting in fewer stars being visible and generally detracting from the quality of life in Campbell.

Future development would be required to be consistent with the General Plan, as well as lighting and design requirements in the Campbell Municipal Code. The proposed General Plan contains policies and actions related to the regulation and reduction of daytime glare and nighttime lighting.

For example, Policy CD-2.7 calls for the City to reduce the use of highly-reflective and/or transparent building materials in order to reduce the potential for bird strikes and other harm to wildlife. Policy CD-2.8 calls for reduced lighting and transparent, reflective, and/or other elements hazardous to birds in non-building structures such as art, bridges, fencing and sound barriers, and antennae. Policy CD-2.9 requires that lighting and fixtures be integrated with the design and layout of a project and that they provide a desirable level of security and illumination without creating glare and overflow on adjacent properties or excessive artificial light at night (light pollution). Additionally, Action COS- 7.h calls on the City to coordinate with the California Department of Fish and Wildlife, Santa Clara County, the Santa Clara County Water District, and local watershed protection groups to identify standards to reduce impacts between urban development and riparian corridors, including lighting restrictions.

This comment is noted. This comment does not involve or identify any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-6: The Commenter references DEIR Impact 3.10-4: and notes that affordable housing should be a priority in Campbell.

This comment is noted. This comment does not involve or identify any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. It is also noted that the City's Housing Element provides a comprehensive approach to the provision of affordable housing in Campbell. No further response in this EIR is required.

H-7: The Commenter references DEIR Section 3.1 and Impact 4.1: and notes that Campbell doesn't have any notable character, and notes that the city should support natural landscapes and recommends several resources to improve the quality of the city.

The Conservation and Open Space Element addresses conservation topics including: development and use of natural resources, open space, parks and recreational facilities, riparian environments, native plant and animal species, soils, cultural/historical resources, air quality, and alternative energy. It also details objectives and measures for preserving open space for natural resources and the managed production of resources. Additionally, as stated in Policy COS-7.4 it is the City's intention to conserve existing native trees and vegetation where possible, and integrate regionally native plant species into development and infrastructure projects where appropriate.

This comment is noted. This comment does not involve or identify any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-8: The Commenter references DEIR Page 3.1-4 "The city's open space, parks and public facilities, especially multi-use pathways and trails, are major contributors to the physical connection of Campbell and provide linkages between residences, schools and commercial and employment centers." And asks: What about wildlife linkages?

The City of Campbell has prepared the General Plan to include policies and actions intended to protect movement corridors from adverse effects associated with future development and improvement projects. Specifically, Action COS-7.h calls on the City to coordinate with the California Department of Fish and Wildlife, Santa Clara County, the Santa Clara County Water District, and local watershed protection groups to identify potentially impacted aquatic habitat within Campbell and to develop riparian management guidelines to be implemented by development, recreation, and other projects adjacent to creeks, streams, and other waterways. Efforts should result in standards to reduce impacts between urban development and riparian corridors, including lighting restrictions, pollution controls, noise reduction, and other measures deemed appropriate to preserve and enhance the biological function of habitat.

As described under DEIR Impact 3.4-4: Campbell contains numerous aquatic habitats that may be used for movement of wildlife. As noted in Impact 3.4-2, the following aquatic resources are found in the Planning Area: San Tomas Aquinas Creek, Smith Creek, and Los Gatos Creek. While flowing through Campbell, the San Tomas Aquinas Creek and Smith Creek are surrounded by urban development. Portions of the Los Gatos Creek extend along the east side of the Los Gatos Creek County Park, which contains riparian vegetation along the creek banks. The Los Gatos Creek and Los Gatos Creek Trail (found in the Los Gatos Creek County Park) enables wildlife movement; however, there are no large areas of native habitat.

As shown in the proposed General Plan Land Use Map, Open Space land uses are found adjacent to and along the complete stretch of Los Gatos Creek. In addition, the proposed Land Use Map proposes targeted Open Space land uses along San Tomas Aquinas Creek. The areas designated for urban uses by the proposed Land Use Map near both creeks are generally developed with urban uses currently. The Los Gatos Creek County Park and Campbell Park are both designated as Open Space. These areas would continue to be used by wildlife as movement corridors.

This comment is noted. This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-9: The Commenter references DEIR Page 3.1-5 and recommends the City reduce all of the “landscape lighting, security lighting, and streetlights that contribute to light pollution.”

As described under Response H-5, future development would be required to be consistent with the General Plan, as well as lighting and design requirements in the Campbell Municipal Code. The proposed General Plan contains policies and actions related to the regulation and reduction of daytime glare and nighttime lighting.

For example, Policy CD-2.7 calls for the City to reduce the use of highly-reflective and/or transparent building materials in order to reduce the potential for bird strikes and other harm to wildlife. Policy CD-2.8 calls for reduced lighting and transparent, reflective, and/or other elements hazardous to birds in non-building structures such as art, bridges, fencing and sound barriers, and antennae. Policy CD-2.9 requires that lighting and fixtures be integrated with the design and layout of a project and that they provide a desirable level of security and illumination without creating glare and overflow on adjacent properties or excessive artificial light at night (light pollution). Additionally, Action COS- 7.h calls on the City to coordinate with the California Department of Fish and Wildlife, Santa Clara County, the Santa Clara County Water District, and local watershed protection groups to identify standards to reduce impacts between urban development and riparian corridors, including lighting restrictions.

This comment is noted. This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-10: The Commenter references DEIR Page 3.1-7 and notes “The Streetscape Standards require Chinese Pistache (*Pistacia chinensis*) as street trees for the section of Winchester Boulevard within the Plan Area.” the commenter further states support for local native vegetation, and request that the city update streetscape standards.

This comment is noted. This comment specifically addressed “Streetscape Standards” and does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-11: The Commenter references DEIR Impact 4.4: and concludes the main reason that this is less than cumulatively considerable is because most of the natural habitats have already been destroyed.

The commenter correctly identifies Impact 4.4: and its impact conclusion. This comment is noted. This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-12: The Commenter references general comments on a variety of Community Design Element Policies and provides input on a variety of topics.

This comment is noted. This comment specifically addressed the General Plan Policy document does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-13: The Commenter references Cultural Resources section 3.5 of the DEIR, and states support for consultation with local tribes.

This comment is noted. This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-14: The Commenter references “Greenhouse Gas Emissions, Climate Change & Energy” (Section 3.7) of the DEIR and encourages the city to include guidance and programs to that support GHG reduction strategies including CAPs ,solar installations etc.

As described throughout the Conservation and open space Element the City has included a variety of policies and actions that promote GHG reduction strategies as identified by the commenter. This includes calling for the preparation of a climate action plan (CAP), as well as a variety of green building techniques, including energy efficient standards and the promotion of renewable and alternative energy. Below is a list of several policies and actions that may be of interest to the commenter:

- Policy COS-10.2: Align the City’s local GHG reduction targets with the statewide GHG reduction targets of Assembly Bill 32, and align the City’s GHG reduction goal with the statewide GHG reduction goal of Executive Order S-03-05.
- Policy COS-10.9: Coordinate with Santa Clara County and nearby cities to implement regional GHG reduction plans and consolidate efforts to reduce GHGs throughout the county.
- Action COS-10.c: Prepare a Climate Action Plan that establishes GHG reduction targets that are consistent with Statewide GHG reduction goals, and includes an implementation program to achieve the reduction targets. Periodically review and update the Plan as necessary to achieve the GHG reduction targets specified in the Plan.
- Policy COS-8.1: Require all development projects to comply with the mandatory energy efficiency requirements of the California Green Building Standards Code (CALGreen) and Building and Energy Efficiency Standards.
- Policy COS-8.2: Support and encourage the implementation of innovative and green building best management practices including, but not limited to, sustainable site planning, solar opportunities, LEED certification for new development, the local adoption of Reach Codes, and incorporation of net zero energy development standards in the California Code of Regulations (CCR), Title 24, if feasible.
- Policy COS-8.3: Promote City operations as a model for energy efficiency and green building and install, as feasible, energy-efficient lighting, appliances, and alternative-energy infrastructure in City facilities.

This comment is noted. This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-15: The Commenter notes that climate change may impact future water supplies.

As described in the Draft EIR’s water supply assessment (WSA) (Appendix B of the DEIR), based on Valley Water’s water supply plans and Urban Water Management Plan projections, Valley Water expects to be able to meet the needs of the service area through at least 2045 for average and single-dry years without a call for water use reductions. The impact of this project is not consequential and Valley Water has the capacity to serve this project through buildout based on current water supply capacity and Valley Water’s proposed water supply projects.

Additionally Action CSF-3.c requires the City to regularly review and update the City’s water conservation measures to be consistent with current best management practices for water conservation, considering measures recommended by the State Department of Water Resources, the California Urban Water Conservation Council, and the Bay Area Water Supply and Conservation Agency.

This comment is noted. This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the

commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-16: The Commenter references DEIR Page 3.9-15 Chapter 9.146 of the Campbell Municipal Code (Water Efficient Landscape Regulations), notes many of the requirements, and questions if objectives are being achieved.

This comment is noted. This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-17: The Commenter references DEIR Page 3.9-21-22: and states that new developments should not be creating runoff and pollutants similar to existing conditions.

As described on DEIR Pg. 3.9-32-33 the General Plan sets policies and actions for build-out of the City, but it does not envision or authorize any specific development project. Because of this, the site-specific details of potential future development projects are currently unknown and analysis of potential project specific impacts of such projects is not feasible and would be speculative. Each future development project must include detailed project specific drainage studies that assess the drainage characteristics and flood risks so that an appropriate SWMP can be prepared to control storm water runoff, both during and after construction. The SWMP will ultimately include project specific best management measures that are designed to allow for natural recharge and infiltration of stormwater.

This comment is noted. This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-18: The Commenter references DEIR Table 3.9-3: Santa Clara Subbasin Managed Recharge Facility Summary, and states that a portion of our groundwater comes from the State Water Project (SWP) and Central Valley Project (CVP). The commenter disagrees that the potential impact is "less than significant" as we are “already stealing water from elsewhere in the state to recharge our aquifers and sate our excessive water use”.

The SCVWD’s managed recharge systems in the Santa Clara Subbasin are summarized in Table 3.9-3.

As described on DEIR Pg. 3.9-22-29 the SCVWD’s managed recharge programs uses both runoff captured in local reservoirs and imported water delivered by the raw water conveyance system to recharge groundwater through more than 390 acres of recharge ponds and over 90 miles of local creeks.

2.0 COMMENTS ON DRAFT EIR AND RESPONSES

The SCVWD actively monitors groundwater elevations to evaluate current groundwater conditions and land subsidence, optimize recharge efforts, access groundwater storage, and support groundwater management efforts. According to the July 2020 Groundwater Condition Report, the Santa Clara Valley Groundwater Basin's groundwater storage is above average and the June 2020 groundwater levels Santa Clara Plain Well (06S01W24H015) were slightly below the 5-year average. Overall, the 2020 managed recharge to date for the Santa Clara Plain is 22,300 AF while the 2020 groundwater pumping to date is 29,500 AF.

The Sustainable Groundwater Management Act (SGMA) defines sustainable yield as the maximum quantity of water, calculated over a base period representative of long-term conditions in the basin and including any temporary surplus, that can be withdrawn annually from a groundwater supply without causing an undesirable result. According to the 2016 Groundwater Management Plan, the annual Santa Clara Plain pumping should not exceed 200,000 AF. However, the District does not manage to a particular value for sustainable yield, but instead manages groundwater to maintain sustainable conditions through annual operations and long-term water supply planning.

The City of Campbell General Plan included a variety of policies and actions to support water conservation throughout the planning area. Additionally, all future development is required to demonstrate adequate water supplies, consistent with General Plan Action CSF-3.1, which requires projects to demonstrate proof of adequate water supply (e.g., that existing services are adequate to accommodate the increased demand, or improvements to the capacity of the system to meet increased demand will be made prior to project implementation) and that potential cumulative impacts to water users and the environment will be addressed.

This comment is noted. This comment does not involve or identify any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-19: The Commenter references DEIR Table 3.10-5: and notes the Regional Housing Needs Allocation (RHNA) and disagrees with the RHNA allocations.

This comment is noted. The City does not set the RHNA. Each city, town, and county is assigned a number as part of the Regional Housing Needs Assessment or "RHNA". The total number of new homes the Bay Area needs to build is determined by the California Department of Housing and Community Development, or HCD, and distributed at the local level by the regional planning agency which, for the City of Campbell, is the Association of Bay Area Governments (ABAG).

This comment does not involve or identify any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-20: The Commenter references a variety of topics and issues within the Noise Chapter (3.12) of the DEIR and included the following questions and concerns. The commenter asks if shifting weather patterns are considered in noise modeling.

As described on DEIR Pg. 3.12-5, the FHWA Highway Traffic Noise Prediction Model (FHWA-RD 77-108) was used to develop Ldn (24-hour average) noise contours for all highways and major roadways in the Planning Area. The model is based upon the CALVENO noise emission factors for automobiles, medium trucks, and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receiver and the acoustical characteristics of the site. The FHWA Model predicts hourly Leq values for free-flowing traffic conditions and is generally considered to be accurate within 1.5 dB. To predict Ldn values, it is necessary to determine the hourly distribution of traffic for a typical 24-hour period.

Existing traffic volumes were obtained from the traffic modeling performed for the General Plan study area. Day/night traffic distributions were based upon continuous hourly noise measurement data. Heavy truck counts were also provided by the traffic engineer. Using these data sources and the FHWA traffic noise prediction methodology, traffic noise levels were calculated for existing conditions. Table 3.12-2 shows the results of this analysis.

Traffic noise levels are predicted at the sensitive receptors located at the closest typical setback distance along each project-area roadway segments. In some locations sensitive receptors may be located at distances which vary from the assumed calculation distance and may experience shielding from intervening barriers or sound walls. However, the traffic noise analysis is believed to be representative of the majority of sensitive receptors located closest to the project-area roadway segments analyzed in this report.

The FHWA Model contains the following modeling components:

- Five standard vehicle types, as well as user-defined vehicles.
- Constant-flow and interrupted-flow traffic.
- Effects of different pavement types and graded roadways.
- Sound-level computations based on a one-third octave-band database and one-third octave-band algorithms.
- Graphically interactive noise barrier design optimization.
- Attenuation over/through rows of buildings and dense vegetation.
- Multiple diffraction analyses.
- Parallel barrier analyses.
- Contour analyses.

As such, wind is not specifically identified in the FHWA modeling components. However, these components are supported by a scientifically founded and experimentally calibrated acoustic computation methodology and a new flexible database. The database is made up of more than 6,000 individual vehicle pass-by events, measured at 40 sites across the country. It is the primary building block around which the acoustic algorithms are structured.

Additionally, during the community noise level survey, actual noise measurement would include all existing conditions that impact noise. The community noise survey was conducted to document ambient noise levels at various locations throughout the City. Short-term noise measurements were conducted at six locations throughout the City on June 28-29, 2022. In addition, four continuous 24-hour noise monitoring sites were also conducted to record day-night statistical noise level trends. The data collected included the hourly average (Leq), median (L50), and the maximum level (Lmax) during the measurement period. Noise monitoring sites and the measured noise levels at each site are summarized in DEIR Table 3.12-6 and Table 3.12-7. DEIR Figure 3.12-1 shows the locations of the noise monitoring sites.

H-21: The Commenter references a variety of topics and issues within the Noise Chapter (3.12) of the DEIR and included the following questions and concerns: The commenter asks if lawn mowers and leaf blowers figure into these noise thresholds, and supports the restriction and use of such tools.

The General Plan Noise Element does not specifically regulate the use of lawn mowers and leaf blowers and there is not adopted threshold specifically for the use of these items. However, as stated in Policy N-1.16 non-transportation related noise from site specific noise sources must comply with the standards shown in Table N-2.

Additionally the General Plan includes several policies and actions aimed at reducing noise from sources mentioned by the commenter. These include:

Action N-1.d, which calls for the City to update Section 21.16.070 – (Noise) of the Campbell Municipal Code to include detailed standards and procedures for dealing with community noise complaints and corresponding enforcement and remediation activities. The standards should address, at a minimum:

- Criteria for determining if the alleged noise-generating activities are in violation of the City's adopted noise standards; and
- Procedures and protocols to ensure that the nuisance noise, or noise-generating activity, ceases.

Action N-1.f considers requiring the phased elimination of the use of gas-powered leaf blowers within the City.

Action N-1.j Explores and considers rebate, incentive, and educational opportunities to reduce community noise, while providing co-benefits of community health and environmental stewardship. Programs could include electric lawn and garden equipment upgrade programs, dual pane/noise rated window upgrades, and HVAC system upgrades which coincide with energy reduction, community health, and sustainability objectives identified by the General Plan and any future Climate Action Plan.

This comment does not involve or identify any new significant impacts or “significant new information” that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter.

These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-22: The Commenter referenced General Plan Strategy CNR-10.1i: Vehicle Noise Reduction: and supports further vehicle regulations to reduce noise.

This comment specifically addresses the General Plan's policy guidance and does not involve or identify any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

H-23: The Commenter references DEIR Table 3.12-8 and disagrees with the noise thresholds.

Noise thresholds have been developed and compared using industry standards. Specially, threshold's identified in DEIR Table 3.12-8 are from the Federal Interagency Committee on Noise (FICON). Based on Table 3.12-8 data, an increase in the traffic noise level of 1.5 dB or more would be significant where the pre-project noise level exceeds 65 dB Ldn. Extending this concept to higher noise levels, an increase in the traffic noise level of 1.5 dB or more may be significant where the pre-project traffic noise level exceeds 75 dB Ldn. The rationale for the Table 3.12-8 criteria is that, as ambient noise levels increase, a smaller increase in noise resulting from a project is sufficient to cause annoyance.

These transportation noise thresholds of significance shown in Table 3.12-8 are established by the proposed General Plan via Policy N-1.8. Additionally, all DEIR Noise thresholds are described in detail on DEIR Pg. 3.12-14 through 3.12-17.

This comment does not involve or identify any new significant impacts or "significant new information" that would require recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5. The City appreciates the comments and input provided by the commenter. These comments have been forwarded to the Planning Commission and City Council for consideration. No further response in this EIR is required.

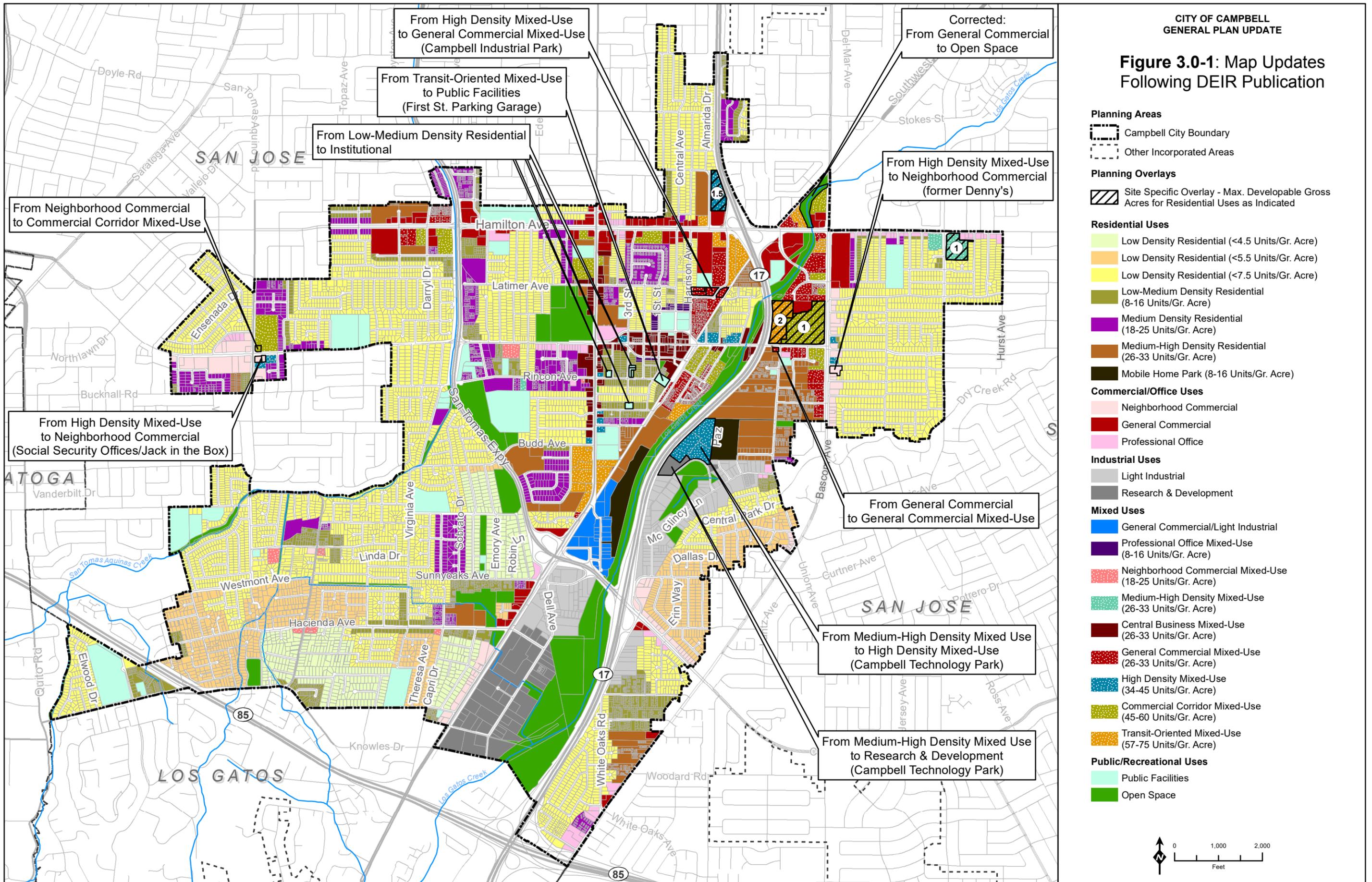
This chapter includes minor edits to the EIR. These modifications resulted from responses to comments received during the Draft EIR public review period, as well as City initiated changes to add additional clarity and to reflect minor cleanup items on the General Plan Land Use Map.

Revisions herein do not result in new significant environmental impacts, do not constitute significant new information, and do not alter the conclusions of the environmental analysis that would warrant recirculation of the Draft EIR pursuant to State CEQA Guidelines Section 15088.5. Changes are provided in revision marks with underline for new text and ~~strike out for deleted text~~.

3.1 REVISIONS TO THE DRAFT EIR

Since circulation of the Draft EIR, the City of Campbell has been working to refine the Land Use Map consistent with housing goals and HCD guidance to support regional housing objectives, identify and refine housing opportunity sites, and to cleanup any mapping errors or text changes. Since circulation of the Draft EIR, a few minor Land Use Map “cleanups” have been made and a few parcels have changed based on feedback from HCD on the City’s Housing Element. All Land Use Map changes that have been made since the DEIR was circulated for public review are included in the updated Figure LU-1 of the Campbell General Plan, as well as Figure 2.0-2 in the DEIR Project description. The updated Land Use Map is shown below in the updated Figure 2.0-2, and specific changes made since circulation of the DEIR are included below in FEIR Figure 3.0-1 (Land Use Map updated since publication of the DEIR). As shown in Figure 3.0-1, changes include the addition of Open Space (OS) along the riparian corridor in the northern portion of the Planning Area to correct a mapping error, updates to three parcels to reflect existing institutional type uses, and an update to one parcel from Neighborhood Commercial to Commercial Corridor Mixed Use to support housing objectives. The map revisions would not alter the overall buildout growth projections analyzed in the DEIR. These map revisions herein do not result in new significant environmental impacts, do not constitute significant new information, and do not alter the conclusions of the environmental analysis that would warrant recirculation of the Draft EIR pursuant to State CEQA Guidelines Section 15088.5.

Figure 3.0-1: Map Updates Following DEIR Publication



Planning Areas

- Campbell City Boundary
- Other Incorporated Areas

Planning Overlays

- Site Specific Overlay - Max. Developable Gross Acres for Residential Uses as Indicated

Residential Uses

- Low Density Residential (<4.5 Units/Gr. Acre)
- Low Density Residential (<5.5 Units/Gr. Acre)
- Low Density Residential (<7.5 Units/Gr. Acre)
- Low-Medium Density Residential (8-16 Units/Gr. Acre)
- Medium Density Residential (18-25 Units/Gr. Acre)
- Medium-High Density Residential (26-33 Units/Gr. Acre)
- Mobile Home Park (8-16 Units/Gr. Acre)

Commercial/Office Uses

- Neighborhood Commercial
- General Commercial
- Professional Office

Industrial Uses

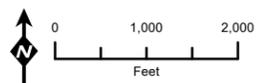
- Light Industrial
- Research & Development

Mixed Uses

- General Commercial/Light Industrial
- Professional Office Mixed-Use (8-16 Units/Gr. Acre)
- Neighborhood Commercial Mixed-Use (18-25 Units/Gr. Acre)
- Medium-High Density Mixed-Use (26-33 Units/Gr. Acre)
- Central Business Mixed-Use (26-33 Units/Gr. Acre)
- General Commercial Mixed-Use (26-33 Units/Gr. Acre)
- High Density Mixed-Use (34-45 Units/Gr. Acre)
- Commercial Corridor Mixed-Use (45-60 Units/Gr. Acre)
- Transit-Oriented Mixed-Use (57-75 Units/Gr. Acre)

Public/Recreational Uses

- Public Facilities
- Open Space



EXECUTIVE SUMMARY

Changes were made to the following pages of the Draft EIR:

DEIR Pg. ES-2 ~~San Jose Water Company~~ (Valley Water)

1.0 INTRODUCTION

Changes were made to the following pages of the Draft EIR:

DEIR Pg. 1.0-5

- Santa Clara Valley Water District (Valley Water)

DEIR Pg. 1.0-10 ~~San Jose Water Company~~ (Valley Water)

2.0 PROJECT DESCRIPTION

Changes were made to the following Figure of the Draft EIR:

DEIR Figure 2.0-2 (Proposed Land Use Map)

See Figure 3.0-1, above, for changes to the Proposed Land Use Map

3.1 AESTHETICS AND VISUAL RESOURCES

Changes were made to the following pages of the Draft EIR:

DEIR Pg. 3.1-16 ~~Santa Clara County~~ Valley Water District

DEIR Pg. 3.1-17 ~~Santa Clara County~~ Valley Water District

3.2 AGRICULTURAL AND FOREST RESOURCES

No changes were made to Section 3.2 of the DEIR.

3.3 AIR QUALITY

No changes were made to Section 3.3 of the DEIR.

3.4 BIOLOGICAL RESOURCES

Changes were made to the following pages of the Draft EIR:

DEIR Pg. 3.4-26, 3.4-29, and 3.4-32:

COS-7.c *Where sensitive biological habitats have been identified on or immediately adjacent to a project site, the project shall include appropriate mitigation measures identified by a qualified biologist, which may include, but are not limited to the following:*

- *Pre-construction surveys for species listed under the State or Federal Endangered Species Acts, Migratory Bird Treaty Act, or species identified as special-status by the resource agencies, shall be conducted by a qualified biologist;*
- *Provision of temporary or permanent buffers of adequate size (based on the specifics of the protected species) to avoid nest abandonment by nesting migratory birds and raptors associated with construction and site development activities.*
- *Construction barrier fencing shall be installed around sensitive resources and areas identified for avoidance or protection, and to reduce potential soil compaction in sensitive areas; and*
- *Pre-Construction training of contractors and sub-contractors shall be conducted by a qualified biologist to identify and avoid protected species and habitat.*

DEIR pg. 3.4-19 Fish and Game Code §3503, 3503.5, 3513, 3800 –~~Predatory Birds~~

The California Fish and Game Code provide protection for native birds, including their nests and eggs (Sections 3503, 3513, and 3800). These regulations prohibit all forms of take, including disturbance that causes nest abandonment and/or loss of reproductive effort. Raptors (i.e., eagles, falcons, hawks, and owls) are specifically protected under Fish and Game Code Section 3503.5. Additionally, Fish and Game Code 3503 and 3513 are applicable to all birds and birds listed within the Migratory Bird Treaty Act.

~~Under the California Fish and Game Code, all predatory birds in the order Falconiformes or Strigiformes in California, generally called “raptors,” are protected. The law indicates that it is unlawful to take, possess, or destroy the nest or eggs of any such bird unless it is in accordance with the code. Any activity that would cause a nest to be abandoned or cause a reduction or loss in a reproductive effort is considered a take. This generally includes construction activities.~~

DEIR Pg. 3.4-21 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.4-22 The ~~SCVWD~~ Water Resources Protection Collaborative issued Guidelines and Standards for Land Use Near Streams:

DEIR Pg. 3.4-22 The ~~SCVWD~~ Valley Water owns much of the land where the Los Gatos Creek Trail located in the southeast corner of Campbell and would be a responsible agency if any future projects would result in work 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.

DEIR Pg. 3.4-27 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.4-27 COS-7.i Adopt an ordinance incorporating the Guidelines and Standards for Land Use Near Streams into the Zoning Code.

DEIR Pg. 3.4-30 COS-7.i Adopt an ordinance incorporating the Guidelines and Standards for Land Use Near Streams into the Zoning Code.

DEIR Pg. 3.4-30 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.4-32 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.4-32 COS-7.i Adopt an ordinance incorporating the Guidelines and Standards for Land Use Near Streams into the Zoning Code.

DEIR Pg. 3.4-36 Santa Clara ~~County~~ Valley Water District

DEIR Pg. 3.4-36 COS-7.i Adopt an ordinance incorporating the Guidelines and Standards for Land Use Near Streams into the Zoning Code.

DEIR Pg. 3.4-37 Santa Clara ~~County~~ Valley Water District

3.5 CULTURAL AND TRIBAL RESOURCES

No changes were made to Section 3.5 of the DEIR.

3.6 GEOLOGY

No changes were made to Section 3.6 of the DEIR.

3.7 GREENHOUSE GAS, CLIMATE CHANGE AND ENERGY

Changes were made to the following pages of the Draft EIR:

DEIR Page 3.7-37: For example, PG&E is responsible for the mix of energy resources used to provide electricity for its customers, and it is in the process of implementing the Statewide Renewable Portfolio Standard (RPS) to increase the proportion of renewable energy (e.g. solar and wind) within its energy portfolio. However, community choice programs such as the Silicon Valley Clean Energy provide power generation for Campbell residents and businesses by supplying grid power with renewable and carbon free choices and include the following tier structures: Greenstart power 100% carbon free and 50% renewable, and Greenprime 100% carbon free and 100% renewable.

3.8 HAZARDS AND HAZARDOUS MATERIALS

No changes were made to Section 3.8 of the DEIR.

3.9 HYDROLOGY AND WATER QUALITY

Changes were made to the following pages of the Draft EIR:

DEIR Pg. 3.9-1 ~~The San Jose Water Company (Valley Water)~~

DEIR Pg. 3.9-3. ~~Two~~ Several creeks are located within the City's Planning Area: Los Gatos Creek, ~~and~~ San Tomas Aquino Creek, ~~and~~ Smith Creek.

DEIR Pg. 3.9-4 ~~river~~ creek

DEIR Pg. 3.9.-7.

Vasona Dam and reservoir is located on Los Gatos Creek within the town of Los Gatos. The Vasona Lake Dam and Reservoir is one of six original reservoirs approved by the voters in 1934. The reservoir capacity is 495 acre-feet. The surface area is 57 acres. The dam was completed in 1935 and new gates were installed in 1997. The dam inundation area is shown below in Exhibit 3.9-1. As shown the inundation area impacts the SR 85 Roadway in the southernmost portion of the Planning Area.

Exhibit 3.9-1: Vasona Dam inundation Area:



DEIR Pg. 3.9-16

Santa Clara and Llagas Subbasins 2016 2021 Groundwater Management Plan

The ~~2016~~ 2021 Groundwater Management Plan (GWMP) for the Santa Clara and Llagas Subbasins describes the SCVWD's comprehensive groundwater management framework, including existing and potential actions to achieve basin sustainability goals and ensure continued sustainable groundwater management.

DEIR Pg. 3.9-17 ~~SVCWP~~ WVCWP

3.10 LAND USE PLANNING AND POPULATION/HOUSING

No changes were made to Section 3.10 of the DEIR.

3.11 MINERAL RESOURCES

No changes were made to Section 3.11 of the DEIR.

3.12 NOISE

No changes were made to Section 3.13 of the DEIR.

3.13 PUBLIC SERVICES AND RECREATION

Changes were made to the following pages of the Draft EIR:

DEIR Pg. 3.13-10 ~~The Hacienda Percolation Ponds~~ Camden Ponds

DEIR Pg. 3.13-1 through 3.13-4 Section 3.13.1 Environmental Setting - Fire Protection Services.

~~The City of Campbell receives fire protection from the Santa Clara County Fire Department (SCCFD).~~

~~The Santa Clara County Fire Department (SCCFD), which was formed in 1947, provides suppression and dispatches emergency services for a 128.3-mile area. The SCCFD provides firefighting personnel and emergency medical service (basic life support) to the residents and businesses in Los Altos Hills, Los Altos, Cupertino, Saratoga, Monte Sereno, Campbell, and Los Gatos. The Department also provides protection for the unincorporated areas adjacent to those cities. The City of Campbell contracts service through the SCCFD, and the Campbell Police Chief is responsible for SCCFD contracts.~~

~~The SCCFD maintains 15 fire stations, an administrative headquarters, a maintenance facility, five other support facilities. The SCCFD offers fire resources and services that are divided into five major sections: Fire Suppression and Rescue, Fire Investigation, Emergency Medical Services, Special Operations Task Force / Haz-Mat, and Wildland Urban Interface.~~

~~The SCCFD operates two fire stations within the City of Campbell, as shown on Figure 3.13-1. Both stations are City-owned facilities.~~

- ~~• Campbell Fire Station, at 123 Union Avenue, Campbell~~
- ~~• Sunnyoaks Fire Station / McCormack Training Center, at 485 West Sunnyoaks Avenue, Campbell~~

Fire Suppression and Rescue

~~The Fire Suppression Department is configured into three districts. First-call equipment is deployed to deliver initial fire attack and EMS services within 7 minutes. A standard first-alarm assignment for structure fires consists of two engine companies, a ladder truck company, a rescue or hazardous materials company and a Battalion Chief, for a total of 15 people. On working fires, the response is increased to three engines companies, one ladder truck company, a Hazmat and Breathing Support company, one rescue company, two Battalion Chiefs, a Safety Officer, and a Duty Investigator, totaling 25 persons.~~

A second alarm would add another two engine companies, one truck company, one rescue company, and an additional Chief Officer; total staffing for two alarms is then 40 persons. Wildland urban interface companies are trained and equipped to provide structure protection and limited initial attack on wildland incidents.

A brush alarm for vegetation fires in wildland/urban interface areas consists of two engine companies, a Type 3 engine and a Battalion Chief, totaling 9 persons.

Daily emergency response staffing consists of 70 career fire personnel on a 24-hour shift assignment, operating 19 pieces of first line apparatus, plus three Battalion Chief command vehicles, operating from 15 fire stations. In daily operations during declared "Fire Season," patrols function in tandem with ladder trucks during daytime hours. This means that during the summer months, when the probability of a brush fire is high, the truck and patrol vehicle go out on calls as a pair. This guarantees continuous coverage of the entire area served, should another response be required during an alarm.

The SCCFD aims to control emergency incidents that threaten lives, property, and the environment. The Department maintains the following three goals:

- Arrive at the scene of emergencies within five minutes of receipt of alarm, at least 90 percent of the time.
- Maintain "Confined Space Operational Level" training for all Department responders.
- Maintain "Rescue Systems I" certification for truck and rescue personnel.

The SCCFD has four first-call ladder trucks and one rescue vehicle, which employ specialized equipment designed to carry out rescues such as traffic collisions and industrial accidents. All emergency response personnel are trained in specialized rescue techniques. All apparatus carry a compliment of rescue tools.

Fire Investigation

The Department is one of the few agencies in the Bay Area to staff full time fire investigator positions, augmented by on-call personnel. Investigation of fires provides information on the cause of local fire problems, which provides information to the local news media regarding fire safety education.

Arson Investigation provides for the apprehension of arsonists who cause billions of dollars in property damage, fraud and death each year. The Department also uses the AIRS program to track arson registrants/suspects and compile fire statistics. With local police agencies, the Santa Clara County Fire Investigation Unit track down many arson investigations, as they account for about 25% of fires. The SCCFD places a strong emphasis on quelling arson fires.

Emergency Medical Services

The SCCFD provides first response Advanced Life Support (ALS) Paramedic level services to Unincorporated Santa Clara County, Campbell, Cupertino, Los Altos, Los Altos Hills, Los Gatos, Monte Sereno, and Saratoga. An Emergency Medical Services (EMS) Coordinator and a Firefighter Engineer Paramedic, who report to the Battalion Chief of Operations, facilitate

the delivery of high quality, effective patient care. The District operates 19 fully equipped ALS fire apparatus daily all staffed with a minimum of one Paramedic and two Emergency Medical Technicians (EMT). The Department maintains a Santa Clara County EMS Multi-Casualty Incident (MCI) supply trailer for large scale emergency medical incidents and is a participant in Master Mutual Aid in the event of major disasters.

The Department's EMS division is an active participant in the Santa Clara County EMS System, participates in many of the EMS subcommittees, and sits as a representative on the EMS subsection of the Santa Clara County Fire Chiefs Association. The State of California's EMS Authority has recognized the Department as a Continuing Education Provider for both Paramedics and Emergency Medical Technicians.

The District is a participant in Santa Clara County's Electronic EMS patient care record (PCR) system. The software is programmed to capture patient data upon receipt of a 911 call and provides enhanced capabilities for monitoring and evaluating patient care. The Department is committed to the protection of an individual's private patient healthcare information and maintains a comprehensive Privacy Practices Policy.

Santa Clara County EMS has a contract with a third party ambulance transport provider for the ground transport of all patients. The delivery of exceptional EMS in a partially rural area involves the utilization of ALS helicopter service providers. The Department routinely works with the various transport providers in order to rapidly transport critical patients from all locations to definitive care. Some areas covered by the department are so remote that an ALS helicopter is part of the initial EMS dispatch. The Department conducts extensive in-service training on a routine basis to insure the most up to date EMS skills, procedures, and practices are implemented and delivered to the citizens and visitors of Santa Clara County.

Special Operations Task Force / Haz-Mat

The mission of the SCCFD Special Operations Task Force is to improve emergency responses that are outside the scope of typical emergency calls through advanced training, teaching, and emergency responses in the district and adjoining agencies.

In addition to regular fire department training, all members are required to have the following:

- CSFM Fire Instructor 1A and 1B
- Confined Space Rescue
- Trench Rescue
- Low Angle Rescue
- Rescue Systems I and/or II
- CSTI Hazardous Materials Technician or Specialist
- Haz-Mat Safety Officer/All Risk

Continued training includes:

- Weekly Special Ops, multi company training
- Participation in the quarterly Hazardous Materials Countywide Refresher Training
- UASI Urban Shield Exercise/Competition and Participation (12 hours)

~~The SCCFD Special Operations Task Force may be deployed within the district when needed by Incident Command request of the Special Operations Task Force. Haz-Mat 72 is also recognized as an OES Type 1 resource for large WMD or large scale Haz-Mat events throughout the state.~~

~~Some Santa Clara County Fire Department Special Operations Task Force (SOTF) members have been attached to FEMA Task Force 3, local SWAT teams, or actively teach for private and public agencies. Some member deployments and SOTF deployments include:~~

- ~~• Hurricane Katrina – rescue and Haz-Mat operations (2005)~~
- ~~• San Jose High Rise Rescue (2011)~~
- ~~• Santa Clara County City Six Flags Roller Coaster Rescue (2007)~~
- ~~• San Jose Downtown / AT&T – 1,300-gallon Diesel Spill (2010)~~
- ~~• Santa Clara City/ CHP – Bomb maker's facility (2013)~~
- ~~• Los Altos – PG&E House Explosion (2002)~~
- ~~• Suspicious Package/ Envelope diagnostics at Campbell PD, Moffett Field, Google, eBay, Stanford and Apple (various years)~~
- ~~• Trench and steep terrain rescues (various years)~~

The City of Campbell receives fire protection from the Santa Clara County Fire Department (SCCFD).

The Santa Clara County Fire Department (SCCFD), which was formed in 1947, provides suppression and dispatches emergency services for a 128.3-mile area. The SCCFD provides fire prevention, fire investigation, and all-hazard emergency services inclusive of structural and wildland firefighting, rescue and advanced life support emergency medical services (EMS), and special operations response to the residents and businesses in Los Altos Hills, Los Altos, Cupertino, Saratoga, Monte Sereno, Campbell, and Los Gatos. The Department also provides protection for the unincorporated areas adjacent to those cities. The City of Campbell contracts service through the SCCFD, and the Campbell Police Chief is responsible for SCCFD contracts.

The SCCFD maintains 15 fire stations, an administrative headquarters, a maintenance facility, and five other support facilities. Additionally, the SCCFD supplies executive leadership by contract to the Santa Clara County Office of Emergency Management, and the Santa Clara County 9-1-1 Communications Department. The SCCFD offers fire resources and emergency services that are divided into five major sections: Fire Suppression, Rescue and Emergency Medical Services, Fire Investigation, Special Operations, and Wildland Urban Interface.

The SCCFD operates two fire stations within the City of Campbell, as shown on Figure 3.13-1. Both stations are City-owned facilities.

- Campbell Fire Station, at 123 Union Avenue, Campbell

- Sunnyoaks Fire Station / McCormack Training Center, at 485 West Sunnyoaks Avenue, Campbell

Fire Suppression and Rescue

Emergency response falls under the operations division. SCCFD's fifteen fire stations are configured into three battalions. First-call equipment is deployed to deliver initial fire attack and EMS services for moderate and high-risk incidents with first unit arrival within 8 minutes. A standard first-alarm assignment for structure fires consists of two engine companies, a ladder truck company or a rescue and a Battalion Chief, for a total of 11 people. On working fires, the response is increased to three engines companies, one ladder truck company, a Hazmat and Breathing Support company, one rescue company, two Battalion Chiefs, a Safety Officer, and a Duty Investigator, total 25 persons.

A second-alarm would add another two engine companies, one truck company, one rescue company, and an additional Chief Officer; total staffing for two alarms is then 40 persons. Wildland-urban interface companies are trained and equipped to provide structure protection and initial attack on wildland incidents.

A brush alarm for vegetation fires in wildland/urban interface areas consists of two Type 1 engine companies, a Type 3 or Type 6 engine company, and a Battalion Chief, totaling 10 persons.

Daily emergency response staffing consists of 66 career fire personnel on a 24-hour shift assignment, using 19 pieces of first-line apparatus, plus three Battalion Chief command vehicles, and working from 15 fire stations.

The SCCFD aims to "improve survivability for victims of fire, hazardous materials release, entrapment or other crisis incidents" (SCCFD, 2020):

- First unit arrival at structure fires, vegetation fires, and other crisis incidents in urban areas in an average of 5:30 and under 7:50 ninety percent of the time.
- Contain structure fires to the room of origin at or above current, published, national average percentage.
- Keep vegetation fires to three acres or less ninety percent of the time.

The SCCFD has three ladder trucks, three rescue vehicles, and one urban search and rescue vehicle which employ specialized equipment designed to help personnel carry out technical rescues such as traffic collisions and industrial accidents. All emergency response personnel are trained in specialized rescue techniques. All SCCFD apparatus are equipped with a compliment of rescue tools scaled to their local hazards.

Fire Investigation

The Department provides fire investigation services by means of specially trained fire prevention division staff, whom are augmented by on-call personnel. The Department

contracts with the Campbell Police Department for criminal investigation services in conjunction with the arson program, and in cooperation with other local law enforcement agencies. Conducting effective fire investigations results in information on the origin and cause of fire incidents, finds local fire problems, and supports prosecution of arsonists who nationwide cause billions of dollars in property damage, fraud, injuries, and death each year. In turn this supplies information to the SCCFD's Community Education and Risk Reduction Services program to better identify community risk and provide targeted fire safety education to the community.

Emergency Medical Services

The SCCFD provides first response Advanced Life Support (ALS) Paramedic level services to Campbell, Cupertino, Los Altos, Los Altos Hills, Los Gatos, Monte Sereno, Saratoga, and unincorporated areas of Santa Clara County. The EMS section, under the direction of the Deputy Chief of Operations, facilitates the delivery of high quality, effective patient care. The section is overseen by an Emergency Medical Services (EMS) Coordinator, who is a registered nurse, and a Firefighter Paramedic. The Department uses 19 fully equipped ALS fire apparatus daily, all staffed with a minimum of one Paramedic and two Emergency Medical Technicians (EMT). The Department maintains a Santa Clara County EMS Multi-Casualty Incident (MCI) supply trailer for large-scale emergency medical incidents and is a participant in Master Mutual Aid in the event of major disasters.

The EMS section is an active participant in the Santa Clara County EMS System, takes part in many of the EMS subcommittees, and sits as a representative on the EMS subsection of the Santa Clara County Fire Chiefs Association. The State of California's EMS Authority has recognized the Department as a Continuing Education Provider for both Paramedics and EMTs.

The SCCFD is a participant in Santa Clara County's Electronic EMS patient care record (PCR) system. The software is programmed to capture patient data upon receipt of a 911 call and provides enhanced capabilities for monitoring and evaluating patient care. The Department is committed to the protection of an individual's private patient healthcare information and maintains a comprehensive Privacy Practices Policy.

Santa Clara County EMS has a contract with a third-party ambulance transport provider for the ground transport of all patients. The delivery of exceptional EMS in a partially rural area involves the utilization of ALS helicopter service providers. The SCCFD routinely works with the various transport providers in order to rapidly transport critical patients from all locations to definitive care. Some areas covered by the department are so remote that an ALS helicopter is part of the initial EMS dispatch. The Department conducts extensive in-service training on a routine basis to insure that most up to date EMS skills, procedures, and practices are implemented and delivered to the citizens and visitors of Santa Clara County.

Special Operations Task Force / Haz-Mat

The mission of the SCCFD Special Operations Task Force is to improve emergency responses that are outside the scope of typical emergency calls through advanced training, teaching, and emergency responses in the district and adjoining agencies.

In addition to regular fire department training, Special Operations Task Force members are required to have the following training:

- Incident command and fire instructor training
- Technician and/or specialist-level training for rope rescue, confined space, trench, and structural collapse rescue incidents

Hazardous Materials technician and/or specialist-level training with enhanced CBRNE component

Continued training includes:

- Weekly task force training and multi company training
- Participation in quarterly hazardous materials and technical rescue training exercises with countywide stakeholders.

The SCCFD Special Operations Task Force may be deployed to incidents based on incident scope and dispatch protocols, or by request of the incident command. USAR 85 is certified by Cal-OES Fire and Rescue Division as a Type-1 (Heavy) Urban Search and Rescue Company. Haz-Mat 72 is also certified by Cal-OES Fire and Rescue Division as a Type 1 Hazardous Materials Response Team. Each resource can be deployed statewide to significant natural or human-caused incidents through the California Fire and Rescue mutual-aid system.

Several SCCFD Special Operations Task Force (SOTF) personnel are members of California Urban Search and Rescue Task Force 3, one of 8 national urban search and rescue task forces here in California, and a total of 28 such task forces nationwide. These task forces are deployed by FEMA to provide urban search and rescue support for national-level disasters. Team members have deployed to various hurricanes, floods, and earthquakes since SCCFD became a participating agency after the events of September 11, 2001.

3.14 CIRCULATION

No changes were made to Section 3.14 of the DEIR.

3.15 UTILITIES AND SERVICE SYSTEMS

Changes were made to the following pages of the Draft EIR:

DEIR Pg. 3.15-1 ~~The San Jose Water Company~~ (Valley Water)

DEIR Page 3.15-14 ~~Santa Clara Valley Water District Water Supply and Infrastructure Master Plan 2040~~

DEIR Page 3.15-14 The SCVWD's ~~2012~~ Water Supply and Infrastructure Master Plan 2040

DEIR Pg. 3.15-28 ~~river~~ creek

DEIR Page 3.15-28: The Safe, Clean Water and Natural Flood Protection Program, has the following 6 priorities:

Priority A: Ensure a Safe, Reliable Water Supply

Priority B: Reduce Toxins, Hazards, and Contaminants in our Waterways

Priority C: Protect our Water Supply and Dams from Earthquakes and Other Natural Disasters

Priority D: Restore Wildlife Habitat and Provide Open Space

Priority E: Provide Flood Protection to Homes, Businesses, Schools, Streets, and Highways

Priority F: Support Public Health and Public Safety for Our Community

~~The Clean, Safe Creeks and Natural Flood Protection (CSC) Plan was approved by Santa Clara County voters in November 2000 to create a countywide special parcel tax to accomplish the following four goals:~~

- ~~• 100-year flood protection for homes, schools, businesses, and transportation;~~
- ~~• Clean, safe water in Santa Clara County creeks and bays;~~
- ~~• Healthy creek and bay ecosystems; and~~
- ~~• Trails, parks, and open space along waterways.~~

DEIR Page 3.15-32 ~~The West Valley Clean Water Program (WVCWP) was established in 1994 as a collaborative effort between the smaller west valley communities (Campbell, Monte Sereno, Saratoga, and Los Gatos) to implement stormwater pollution control and management efforts. The WVCWP goal is to reduce pollutants in storm drain discharges, comply with MRP regulations and requirements, and maximize the effectiveness of pollution prevention efforts. The Santa Clara Valley Water District (SCVWD) administers an Urban Runoff Management Plan to reduce stormwater pollution, which includes the following specific actions:~~

- ~~• Municipal controls such as storm drain stenciling, storm drain operation and maintenance (O&M), street sweeping, street/public facilities maintenance, and illegal discharge response.~~

- ~~Construction and development measures including on-site inspections, grading and erosion controls, and educating developers.~~
- ~~Commercial and industrial facility inspections to prevent wastes from discharging into the storm drain system.~~

~~Public education activities to increase awareness and change behavior.~~

~~By agreement with the participating cities and towns, the WVSD collects an additional surcharge from residences and commercial properties to fund the WVCWP. The SCVWD complies with the requirements of the MRP for urban runoff pollution control.~~

The West Valley Clean Water Program Authority (Authority) serves as the Stormwater Pollution Prevention Authority for the cities of Campbell, Monte Sereno, Saratoga, and the Town of Los Gatos. The Authority was created to maximize the effectiveness, efficiency, and cost-benefit of collective stormwater pollution prevention efforts of the four West Valley communities. The Authority was formally established in February 2018 but has been operating as a collaborative stormwater management program since 1992.

The Authority's member agencies must comply with the NPDES stormwater permit, which mandates certain activities including maintenance of the stormwater drain system.

The Authority develops an annual work plan to fulfill the requirements of its MRP and to reduce the amount of pollutants discharged in urban runoff. The plan is a comprehensive program that is designed to reduce the discharge of pollutants to the maximum extent practicable and encompasses best practices for the following operational areas:

- Construction Site Stormwater Runoff Control
- Commercial Facilities
- Illicit Discharge Detection and Elimination
- Industrial Facilities
- Municipal Operations/Pollution Prevention and Good Housekeeping
- Post Construction Storm Water Management
- Public Education
- Public Participation

The Authority also participates in the Santa Clara Valley Urban Runoff Program (Program). The Program is an association of thirteen cities and towns in Santa Clara Valley, the County of Santa Clara, and the Santa Clara Valley Water District that share a common permit to discharge stormwater to South San Francisco Bay. Member agencies include Campbell, County of Santa Clara, Cupertino, Los Altos, Los Altos Hills, Los Gatos, Milpitas, Monte Sereno, Mountain View, Palo Alto, San Jose, Santa Clara, Santa Clara Valley Water District, Saratoga, and Sunnyvale.

3.16 WILDFIRE

No changes were made to Section 3.15 of the DEIR.

4.0 CUMULATIVE/OTHER CEQA-REQUIRED TOPICS

No changes were made to Section 4.0 of the DEIR.

5.0 ALTERNATIVES

No changes were made to Chapter 5.0 of the DEIR.

6.0 REPORT PREPARERS

No changes were made to Chapter 6.0 of the DEIR.

7.0 REFERENCES

The following references are added to Section 7.0 of the DEIR:

Regional Water Quality Control Board (RWQCB) Municipal Regional Stormwater NPDES Permit. May 11, 2022 (Order No. R2-2022-0018, NPDES Permit No. CAS612008)

Santa Clara Valley Water District Water Supply Master Plan 2040. November 2019.

Available At:

<https://www.valleywater.org/sites/default/files/Water%20Supply%20Master%20Plan%202040>