Stantec

Campbell Tech Park Project

Final Environmental Impact Report

September 22, 2026

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ACRONYMS AND ABBREVIATIONS

afy	Acre feet per year
AMMR	Alternative Materials and Methods Request
Applicant	Campbell Technology Park, LLC
BLTS	Bicycle Level of Traffic Stress
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CC&R	Covenants, conditions, and restrictions
CEQA	California Environmental Quality Act
City	City of Campbell
CL-	Comment Letter
CMP	Congestion Management Plan
Draft EIR	Draft Environmental Impact Report
EVA	Emergency vehicle access
FHWA	Federal Highway Administration
Final EIR	Final Environmental Impact Report
gcpd	gallons per capita per day
gpd	gallons per day
HMBP	Hazardous Materials Business Plan
LOS	Level of Service
MG	million gallons
mgy	million gallons per year
MMRP	Mitigation Monitoring and Reporting Program
MUTCD	Manual on Uniform Traffic Control Device
NOP	Notice of Preparation
PC-	Planning Commission
PRC	Public Resources Code
proposed project	Campbell Tech Park Project
ROW	Right-of-way
RWQCB	Regional Water Quality Control Board
R&D	research and development

Santa Clara Valley Water District	Valley Water
SB	Senate Bill
SJWC	San Jose Water Company
SR	State Route
UST	underground storage tank
UWMP	Urban Water Management Plan
VMT	Vehicle miles traveled
VTA	Santa Clara Valley Transportation Authority
WVCC	West Valley Construction Company



1.0 INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of Campbell (City), as the lead agency, has evaluated the comments received on the Campbell Tech Park Project (proposed project) Draft Environmental Impact Report (Draft EIR) (State Clearinghouse No. 2024121066). The Draft EIR was circulated for a 45-day public review between April 15, 2026, and June 1, 2026. The responses to the comments and other documents, which are included in this document, together with the Mitigation Monitoring and Reporting Program (MMRP), comprise the Final Environmental Impact Report (Final EIR) for use by the City of Campbell, City Council in its review.

1.1 BACKGROUND AND PURPOSE OF THE EIR

CEQA requires a Lead Agency that has prepared a Draft EIR to provide a copy of the Draft EIR to responsible and trustee agencies that have jurisdiction by law with respect to the proposed project and to provide the general public with an opportunity to comment on the Draft EIR. The Final EIR is the mechanism for responding to these comments. This Final EIR has been prepared to respond to comments received on the Draft EIR, which are reproduced in this document; and to present corrections, revisions, and other clarifications and amplifications to the Draft EIR as a result of the City's ongoing planning efforts. The Draft EIR and Final EIR will be used to support the City's decision regarding whether to approve the proposed project.

This Final EIR can also be used by responsible and trustee agencies to ensure that they have met their requirements under CEQA before deciding whether to approve or permit project elements over which they have jurisdiction. It may also be used by other state, regional, and local agencies that may have an interest in resources that could be affected by the project or that have jurisdiction over portions of the project. The following agencies may serve as responsible and/or trustee agencies:

- San Francisco Bay Regional Water Quality Control Board (RWQCB)

1.2 PROJECT SUMMARY

The proposed project is located at 635, 655, 675, and 695 Campbell Technology Parkway in the City of Campbell on an approximately 17.28-acre site (project site). The project site consists of four contiguous parcels and is bounded by State Route (SR)-17 to the north and west, Campbell Technology Parkway and commercial uses to the south, and single-family developments to the east. The project site is located within a highly urbanized area and the site is entirely developed with a research and development (R&D) campus consisting of four buildings that total approximately 280,684 square feet, known as the Campbell Technology Park. Campbell Technology Park, LLC (Applicant) is proposing to demolish the existing onsite structures to construct a new residential development consisting of 290 residential units. The proposed development would consist of 27 two-story single-family detached homes, three-story townhome-style condominiums with 149 units across 28 buildings, and four-story townhome-style condominiums with 114 units across 15 buildings. Additionally, the proposed project would include public and private open space and on and offsite public improvements.

A detailed description of the proposed project is provided in Section 2.0, Project Description, of the Draft EIR.

1.3 CEQA PUBLIC REVIEW PROCESS

The following provides a summary of the environmental review process to date for the proposed project that has resulted in the preparation of this Final EIR.

1.3.1 Notice of Preparation

The Notice of Preparation (NOP) for the Draft EIR was submitted for an extended 30-day public review period (for a total of 40 days) on January 6, 2025. The comment period for the NOP closed on February 14, 2025. A Public Scoping Meeting was held on January 28, 2025, to solicit input from interested agencies and the public. The City received oral comments at the scoping meeting and also received several written comment letters during the public review period. The comments received were considered during the preparation of the Draft EIR and are summarized in Appendix A of the Draft EIR.

1.3.2 Draft EIR

The Draft EIR was circulated for a 45-day public review between April 15, 2026, and June 1, 2026. The Draft EIR contains a description of the proposed project, description of the environmental setting, identification of proposed project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of proposed project alternatives. The Draft EIR was provided to interested public agencies and the public and was made available for review at City offices and on the City's website.

1.3.3 Final EIR

The City received comment letters from the State Clearinghouse and the public regarding the Draft EIR. This document responds to the written comments received as required by CEQA. This document also contains edits to the Draft EIR, which are included in Section 3.0 Revisions to the Draft EIR. This document constitutes the Final EIR.

1.4 CERTIFICATION OF THE FINAL EIR/PROJECT CONSIDERATION

The City will review and consider the Final EIR. If the City finds that the Final EIR is "adequate and complete," the City may certify the Final EIR. The rule of adequacy generally holds that the EIR can be certified if it does the following: (1) shows a good faith effort at full disclosure of environmental information; and (2) provides sufficient analysis to allow decisions to be made regarding the proposed project in contemplation of its environmental consequences.

Upon review and consideration of the Final EIR, the City may act to adopt, revise, or reject the proposed project. A decision to approve the proposed project would be accompanied by written findings in accordance with CEQA Guidelines Sections 15091 and 15093. Public Resources Code (PRC) Section 21081.6 also requires lead agencies to adopt an MMRP to describe measures that have been adopted or made a condition of the proposed project approval to mitigate or avoid significant impacts on the environment.



1.5 INTENDED USE OF THE EIR

The EIR is intended to evaluate the environmental impacts of the project to the greatest extent possible. This EIR, in accordance with CEQA Guidelines Section 15126, should be used as the primary environmental document to evaluate all planning and permitting actions associated with the proposed project, alternative or modified project approved by City. Please refer to Section 2.0, Project Description, of the Draft EIR for a detailed discussion of the proposed project.

1.6 ORGANIZATION AND SCOPE OF THE EIR

This document is organized into the following sections:

Section 1.0: Introduction

Section 1.0 provides an overview of the EIR process to date and the requirements of the Final EIR.

Section 2.0: Comments and Responses to the Draft EIR

Section 2.0 provides a list of the agencies, organizations, and individuals that commented on the Draft EIR. Copies of all the letters received regarding the Draft EIR and responses thereto are included in this section.

Section 3.0: Revisions to the Draft EIR

Section 3.0 includes an addendum listing refinements and clarifications on the Draft EIR, which have been incorporated as a result of comments or staff-initiated changes.

Section 4.0: References

Section 4.0 includes a list of references identified in this Final EIR.

Mitigation Monitoring and Reporting Program

Measures that have been adopted or made a condition of the project approval in order to mitigate or avoid significant impacts on the environment have been included in the MMRP, provided under separate cover.

Because of its length, the text of the Draft EIR is not included with these written responses; however, it is included by reference in this Final EIR. None of the revisions or clarifications to the Draft EIR identified in this document constitute “significant new information” pursuant to CEQA Guidelines Section 15088.5. As a result, recirculation of the Draft EIR is not required.



2.0 COMMENTS AND RESPONSES TO THE DRAFT EIR

2.1 LIST OF COMMENTERS

Written comments on the Draft EIR received during the public review period and verbal comments received during the Planning Commission meeting held on April 28, 2026, are included in this section.

The format of the responses to all the comments is based on a unique letter and number code for each comment. The first set of letters refer to the format the comment was received in (comment letter [CL-]; verbal comment at the planning commission meeting held on April 28, 2026 [PC-]). The second set of letters refers to the individual agency, business, group, organization, or individual member of the public that provided the comment. The number at the end of the code refers to a specific comment within the individual communications. Therefore, each comment has a unique code assignment so that comments can be cross-referenced with the responses. Following this list, the text of the communication is summarized and followed by the corresponding response. When similar comments are made by multiple parties, the response is provided the first time the comment is made, and all other similar comments are referred back to that response. The written and verbal comments received on the Draft EIR are provided as Appendix A to this Final EIR.

Additionally, a number of comments received on the Draft EIR focused on several main issues and topics associated with the proposed project and the CEQA analysis of project impacts. As such, the City determined it would be appropriate, and would facilitate public review, to provide topical responses to address these comments and provide the necessary context for considering the issues raised.

A list of public agencies, organizations, and individuals that provided comments on the Draft EIR is presented below.

Table 2-1: List of Commenters

Commenter(s)	Affiliation	Comment Date (mm/dd/yyyy)	Comment Format	Commenter Code
Jon Kunkel	Lisjan Nation	4/21/2026	Email	CL-LJ
Plan Review Team	PG&E	4/21/2026	Letter	CL-PGE
Kevin Wun	PG&E	4/24/2026	Letter	CL-PGE2
Susan Landry		4/15/2026	Email	CL-SLandry
Susan Landry		4/28/2026	Email	CL-SLandry2
Susan Landry		4/28/2026	Letter	CL-SLandry3
Tony Clements		4/16/2026	Email	CL-TClements
Vito Racanelli	Roco’s Gardening	5/21/2026	Letter	CL-VRacanelli
Patricia Tinto	Paseo de Palomas Board of Directors	5/26/2026	Letter	CL-PTinto
Unknown (hnh360@gmail.com)		5/29/2026	Email	CL-Unknown
Kenneth Burg	Bellcore Construction	6/1/2026	Email	CL-KBurg

Commenter(s)	Affiliation	Comment Date (mm/dd/yyyy)	Comment Format	Commenter Code
Aaron Liebelt	EmberWest Fireplace & Patio	5/23/2026	Email	CL-ALiebelt
Frank Adorno III	Adorno Construction	5/29/2026	Letter	CL-FAdorno
Glenna Mai	De Anza Water Conditioning, Inc	5/20/2026	Letter	CL-GMai
Jennifer Street	D&J Pest Control, Inc.	5/21/2026	Letter	CL-JStreet
Tim Syslo	Coastline Cabinets	5/20/2026	Letter	CL-TSyslo
Keith Klafter	Sequoia Cabinets	5/20/2026	Letter	CL-KKlafter
Mark Young		5/22/2026	Letter	CL-MYoung
Mark Young	J&M Windows and Glass, Inc.	5/22/2026	Letter	CL-MYoung2
Lorelei Alli	Amah Mutsun Tribal	04/12026	Email	CL-AM
Jaeho Hahn	Santa Clara Valley Water District	6/1/2026	Email	CL-ValleyWater
	Santa Clara County Roads and Airports Departments	6/1/2026	Letter	CL-SCCounty
Triana Crighton	Santa Clara Valley Transportation Authority (VTA)	6/1/2026	Letter	CL-VTA
Yunsheng Luo	California Department of Transportation (Caltrans)	6/1/2026	Letter	CL-Caltrans
Jonathan H. Riker	Atkinson, Andelson, Loya, Ruud & Romo; Fehr & Peers; Kosmont Companies (on behalf of West Valley Construction Company [WVCC])	6/1/2026	Letter	CL-WVCC
Commissioner Adam Buchbinder	City of Campbell Planning Commission	4/28/2026	PC Meeting	PC-ABuchbinder
Commissioner Phil Alne	City of Campbell Planning Commission	4/28/2026	PC Meeting	PC-PAlne
Commissioner Alan Zisser	City of Campbell Planning Commission	4/28/2026	PC Meeting	PC-AZisser
Vice Chair Gary Aquilina	City of Campbell Planning Commission	4/28/2026	PC Meeting	PC-GAquilina
Chair Davis Fields	City of Campbell Planning Commission	4/28/2026	PC Meeting	PC-DFields
Commissioner Matt Kamkar	City of Campbell Planning Commission	4/28/2026	PC Meeting	PC-MKamkar
Mark Rodriguez	Chief Financial Officer and Secretary for WVCC	4/28/2026	PC Meeting	PC-MRodriguez
Chris Darman	WVCC	4/28/2026	PC Meeting	PC-CDarman

Commenter(s)	Affiliation	Comment Date (mm/dd/yyyy)	Comment Format	Commenter Code
Susan Landry		4/28/2026	PC Meeting	PC-SLandry
Graciela Martin-Han		4/28/2026	PC Meeting	PC-GMartinhan
Tony Pedia		4/28/2026	PC Meeting	PC-TPedia
Natalie Strange		4/28/2026	PC Meeting	PC-NStrange
Trudy LaFrance		4/28/2026	PC Meeting	PC-TLaFrance

2.2 REQUIREMENTS FOR RESPONDING TO COMMENTS ON A DRAFT EIR

CEQA Guidelines Section 15088 requires that lead agencies evaluate all comments on environmental issues received on the Draft EIR and prepare a written response. The written response must address the significant environmental issues raised and must be detailed, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, there must be a good faith and reasoned analysis in the written response. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters, 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 impacts on the environment and ways that the significant effects of the project might be avoided or mitigated. CEQA Guidelines Section 15204 also notes that commenters should provide an explanation and evidence supporting their comments. Pursuant to CEQA Guidelines Section 15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion.

CEQA Guidelines Section 15088 also recommends that where a response to comments results in revisions to the Draft EIR, those revisions be incorporated as a revision to the Draft EIR or as a separate section of the Final EIR.

2.3 TOPICAL RESPONSES

A number of comments received on the Draft EIR focused on several main issues and topics associated with the proposed project and the CEQA analysis of project impacts. As such, the City determined it would be appropriate, and would facilitate public review, to provide topical responses to address these comments and provide the necessary context for considering the issues raised. The main issues and topics warranting typical responses are provided in full, below, and include the following:

Table 2-2: Topical Responses

Topics	Topical Response No.
Increased Traffic Congestion and Backup Within the Vicinity of the Project Site	1
Pedestrian and Bicycle Safety	2
Economic Impacts to Existing Businesses	3

Topics	Topical Response No.
Alternate Site Access	4
Conflicts With Existing Industrial Uses and Operations	5
Emergency Access and Response	6
Environmental Setting, Baseline Conditions	7
VMT Analysis	8

2.3.1 Topical Response No. 1: Increased Traffic Congestion and Backup Within the Vicinity of the Project Site

Several commenters stated their concerns regarding increased traffic congestion and backup within the vicinity of the project site in areas where congestion and backup already exist.

Under CEQA, traffic congestion and automobile delay caused by a proposed project are not considered significant environmental impacts. Before July 1, 2020, traffic congestion levels were the standard measurement to determine the potential transportation impacts of a proposed project and a Level of Service (LOS) rating system was used to determine the projected traffic impacts of proposed development on nearby intersections. However, under Senate Bill (SB) 743 which took effect on July 1, 2020, vehicle miles traveled (VMT) replaced LOS as the primary transportation impact metric that is used for the purposes of the CEQA, shifting analysis from congestion to how many miles are traveled per person over a given period of time. As such, LOS and congestion impacts are no longer evaluated as part of CEQA and VMT is the new standard for assessing the effects of growth on the transportation system. Therefore, potential changes in intersection LOS or traffic congestion, including concerns regarding neighborhood cut-through traffic and adding traffic to already congested streets, are not by themselves considered significant environmental impacts under CEQA. The transportation analysis (Appendix G to the Draft EIR) concluded that the proposed project would result in a less than significant transportation impact based on the applicable CEQA criteria.

The intersection LOS analysis included in the Draft EIR was provided for informational purposes only and is not part of the CEQA significance determination. The study intersections included in the Draft EIR's transportation analysis were selected to provide information on anticipated operational conditions in the vicinity of the proposed project. This analysis determined that, even in pre- and post-project circumstances, local intersections would operate at LOS A/B (Draft EIR Appendix G, p. 21). These grades indicate congestion is largely absent from local intersections.

The concerns regarding increased traffic congestion and backup are noted. The purpose of the CEQA analysis is to identify the proposed project's impacts on the existing environment and reduce any potential impacts to the extent feasible. The presence of existing congestion and backup issues at nearby intersections is an existing condition not related to the proposed project. For this reason, and the reasons stated above, the proposed project is not required to mitigate or reduce the existing congestion impacts on nearby roadways.



2.3.2 Topical Response No. 2: Pedestrian and Bicycle Safety

Several commenters expressed concerns related to pedestrian and bicycle safety in the project vicinity due to perceived inadequate pedestrian infrastructure, increased pedestrian and bicycle traffic resulting in increased potential for accidents, and the presence of trucks in the area resulting in pedestrian safety concerns.

The transportation analysis (provided on pp. 3-159 to 3-161 and 3-163 to 3-164 of the Draft EIR and in Appendix G to the Draft EIR) evaluates existing pedestrian and bicycle conditions in the project vicinity, including the location and continuity of sidewalks, bicycle facilities, pedestrian crossings, and the Bicycle Level of Traffic Stress (BLTS) on adjacent roadways. The analysis also documents existing operating speeds, including 85th percentile vehicle speeds, along East McGlincy Lane and Campbell Technology Parkway. In addition, the analysis estimates project-generated pedestrian and bicycle trips and evaluates whether the existing transportation network can safely accommodate the additional activity. The transportation analysis estimated bicycle and pedestrian activity using standard methodologies using ITE trip generation rates, which is accepted industry practice. These estimates were developed for the purpose of evaluating potential changes in multimodal activity associated with the proposed project and informing the qualitative assessment of bicycle and pedestrian conditions.

A commenter stated the proposed project would generate substantial new pedestrian and bicycle trips in the area. Based on the ITE trip generation rates, it is estimated that the proposed project would generate 392 daily pedestrian trips, with 32 pedestrian trips during the AM peak hour and 46 pedestrian trips during the PM peak hour. The estimated number of pedestrian trips generated by the existing development was deducted from the estimated number of trips generated by the proposed project, which resulted in an estimated net increase of 322 daily pedestrian trips with 26 additional pedestrian trips in the AM peak hour and 38 additional pedestrian trips in the PM peak hour. During peak hours, such would amount to one additional pedestrian approximately every two minutes. Additionally, based on the ITE trip generation rates, it is estimated that the proposed project would generate 58 daily bicycle trips, with 3 bicycle trips during the AM peak hour and 9 bicycle trips during the PM peak hour. During peak hours, this translates into one additional bicyclist every 6.5 to 20 minutes. The total number of trips generated by the existing development was deducted from the estimated number of trips generated by the proposed project, which results in a net increase of 51 bicycle trips on a daily basis with 2 additional bicycle trips in the AM peak hour and 9 additional bicycle trips in the PM peak hour. The City does not consider this number of new trips to be substantial. There is a park directly across the street that would attract pedestrian trips, and a crosswalk to access the park is proposed as part of the project in Mitigation Measure TRANS-1. After installation of the crosswalk, pedestrians would have a protected pathway along Campbell Technology Parkway and along East McGlincy Lane to walkable destinations east of the project vicinity, including those specifically identified by a commenter.

Currently, between the project site and East McGlincy Lane, there is a continuous sidewalk on the west side of Campbell Technology Parkway and a discontinuous sidewalk on the east side of the street. Continuous sidewalks also are present along both sides of East McGlincy Lane to the east toward Union Avenue. There are no sidewalks on East McGlincy Lane to the west of Campbell Technology Parkway. A commenter requested that a continuous pedestrian facility be constructed along the extent of East McGlincy Lane. However, the lack of sidewalks in the area is an existing condition. It is unlikely that pedestrians associated with the proposed project would walk on East McGlincy Lane west of Campbell



Technology Parkway because there are no obvious pedestrian destinations in that direction, and there are no sidewalks. The Starbucks at Curtner Avenue and Camden Avenue that one commenter mentioned (which is not part of any larger commercial development), for instance, is not a mandatory trip but a discretionary trip, and would not be considered a viable pedestrian destination. As such, the proposed project would not create the need for sidewalks on that section of East McGlincy Lane and is not required to construct sidewalks along East McGlincy Lane west of Campbell Technology Parkway.

While the proposed project would not interfere with or conflict with existing or planned pedestrian facilities, the project would create a demand for pedestrian facilities on the east side of Campbell Technology Parkway where the sidewalk is discontinuous. As such, the transportation analysis in the Draft EIR identified a potentially significant impact related to discontinuous sidewalks and recommended mitigation consisting of installation of a high visibility ADA-compliant crosswalk across Campbell Technology Parkway at the project's mid-block driveway along with the associated pedestrian warning signs and yield lines in each direction, new ADA-compliant ramps at both ends of this new crosswalk, and installation of a crosswalk along the north leg of the Campbell Technology Parkway at East McGlincy Lane intersection to connect the northeast and northwest corners of the Campbell Technology Parkway/East McGlincy Lane intersection. These recommended measures were included in Mitigation Measure TRANS-1 in Draft EIR Section 3.7, Transportation. With implementation of these measures, the pedestrian impact would be reduced to a less than significant level. The analysis concluded that the proposed project would have a less than significant impact on bicycle facilities because Campbell Technology Parkway and East McGlincy Lane have a BLTS rating of 2, indicating a level of comfort suitable for the average adult bicyclist.

Several comments received on the Draft EIR stated the proposed project and its increase in residents would exacerbate existing conditions along roadways leading to a safety impact. Existing roadway characteristics, including the presence or absence of sidewalks and bicycle facilities and prevailing vehicle speeds, are existing conditions. The commenters did not provide substantial evidence to support their conclusions that the proposed project would exacerbate these existing conditions. Changes in pedestrian and bicycle volumes, by themselves, do not constitute a significant environmental impact under CEQA. The analysis of bicycle and pedestrian conditions focused on whether the existing and planned transportation network would adequately accommodate project-related activity, including access to nearby streets and intersections. Based on this evaluation, the transportation analysis did not identify significant and unavoidable impacts related to bicycle or pedestrian safety or circulation and the proposed project would not require any additional mitigation under CEQA beyond what is already incorporated in the Draft EIR.

A response to comment related to increases in congestion along nearby roadways as a result of increased residents in the area is provided under Topical Response No. 1: Increased Traffic Congestion and Backup Within the Vicinity of the Project Site. Further, there is no evidence that increases in roadway congestion would result in traffic safety impacts; in fact, congested roads tend to reduce average vehicle speeds and, as noted below, most accidents on local streets were the result of excess speeding. Additionally, the City's traffic engineer observed local traffic and observed that speeds along local roads were modest, as identified on p. 3-164 of the Draft EIR and Appendix G to the Draft EIR. This analysis determined that, even in pre- and post-project circumstances, local intersections would operate at LOS A/B (Draft EIR Appendix G, p. 21). These grades indicate congestion is largely absent from local intersections, and there is no evidence that roadway traffic will change in any significant way.



The concerns regarding truck activity, bicycle and pedestrian circulation, and transportation safety are noted and addressed in the Draft EIR, including under Table 1.2-1: Comments Received on the NOP, Section 3.5, Land Use and Planning, Section 3.7, Transportation, Appendix B (which include responsive information to NOP comments), and Appendix G. Transportation impacts under CEQA were evaluated based on VMT, traffic safety, and other issues, including whether incompatible uses had any potential to create or exacerbate safety risks, in accordance with SB 743 and Section 15064.3 of the CEQA Guidelines. As described above, potential impacts to pedestrians, bikes, and safety were evaluated and mitigated in Section 3.7, Transportation, of the Draft EIR.

In addition, evidence demonstrates that existing roadway conditions are not considered dangerous. The California Manual on Uniform Traffic Control Devices (MUTCD) indicates a roadway might be unsafe, and warrant further study, where there is a minimum of four accidents within a one-year period that involve angle or pedestrian crashes (California MUTCD, Part 4 – Highway Traffic Signals, Chapter 4C, Caltrans, Sacramento, CA, January 18, 2026, p. 1053-1054, 1074). Collision reports included in the Draft EIR document there has been one accident along East McGlincy Lane and Campbell Technology Parkway from 2019 to 2024. Based on public comments received (see Response to Comment CL-WVCC-52), the collision analysis has been clarified to reflect five reported collisions based on SWITRS data for the years 2019 to 2024, which equate to one accident per year on a roadway segment that is almost two-thirds of a mile long. This information does not change the conclusion of the analysis provided in the Draft EIR. No fatal or severe injury collisions were reported. The most common primary collision factors were unsafe speed (four collisions) and improper turning (one collision). Two collisions involved a pedestrian and two collisions involved a motorcyclist. No collisions involved bicyclists.

Additionally, the presence of trucks using the roadway does not present an unusual safety condition. The City’s traffic consultant determined, as identified on pp. 3-163 to 3-164 of the Draft EIR, that heavy trucks (Classes 5-13) made up approximately five to six percent of all local vehicle traffic. The proposed project would add only a small number of trucks to the road during construction. Trucks are present to varying degrees on all streets in Campbell, and the streets are built accordingly. The evidence provided in the Draft EIR and herein shows there is nothing unusual about the local street network that renders it dangerous. Having trucks and bicycles both using the same street is a typical condition throughout the City. Furthermore, the comment that trucks are incompatible with bicycles or pedestrians represents a potential impact of the environment on the project users. Comments that the area has narrow streets (e.g., Campbell Technology Parkway), that cannot accommodate pedestrians and bicyclists are not accurate. For example, Campbell Technology Parkway has road widths that range from approximately 25 to 40 feet, with its widest point near the commenter's properties. Under California Fire Code requirements, the minimum width for fire apparatus access road is 20 feet. As Campbell Technology Parkway meets these requirements that are required for large fire apparatus vehicles to navigate the streets, Campbell Technology Parkway would not be considered as a street with narrow widths that cannot accommodate vehicle, pedestrian, and bicycle circulation.

Regarding comments stating trucks and bicycles are believed to be a land use incompatibility issue, please see Topical Response No. 5 - Conflicts With Existing Industrial Uses and Operations. The evidence here and the topical response demonstrates there are no incompatible uses at issue as identified under Draft EIR Impact TRANS-c and there are no demonstrated increases to hazards.



Finally, for the purposes of CEQA, the purpose of the Draft EIR is to identify the significant effects of the proposed project on the environment, not the significant effects of the environment on the proposed project (*California Bldg. Indus. Ass'n v. Bay Area Air Quality Mgmt. Dist.* (2015) 62 Cal.4th 369, 377, 386; *South Orange County Wastewater Authority v. City of Dana Point* (2011) 196 Cal.App.4th 1604, 1614-1618; *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 905). Accordingly, the Draft EIR's significance conclusions regarding traffic safety are supported by the evidence provided in the Draft EIR. and responses provided in this Final EIR.

A discrepancy between the text and the tables included in Appendix G to the Draft EIR was discovered after the public review period of the Draft EIR. The text in Appendix G correctly stated the daily pedestrian and bicycle trips that would result from the proposed project; however, the applicable tables omitted the existing daily trips from existing uses at the project site. As such, revisions have been completed to Appendix G to the Draft EIR to resolve these discrepancies and are included as Appendix B to this Final EIR document. Revisions completed did not change the conclusion of the analysis provided in the Draft EIR. No "significant new information" is introduced that would warrant recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5.

2.3.3 Topical Response No. 3: Economic Impacts to Existing Businesses

The commenter expressed concern that the proposed project could adversely affect the economic viability of existing industrial businesses and uses in the surrounding area.

CEQA evaluates reasonably foreseeable physical changes to the environment. A change which is speculative or unlikely to occur is not reasonably foreseeable (CEQA Guidelines Section 15064(d)(3)). Economic or social effects, including potential effects on business operations, profitability, property values, rents, market competition, or the continued viability of existing industrial uses, are not considered significant environmental effects and are not required to be analyzed as independent impacts. (CEQA Guidelines, Sections 15064(e), 15131; *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560. 575; *Visalia Retail, L.P. v. City of Visalia* (2018) 20 Cal.App.5th 1, 13; *Chico Advocates for a Responsible Economy v. City of Chico* (2019) 40 Cal.App.5th 839, 848.) Furthermore, impacts that solely affect a single individual or single business, as opposed to the environment of the general public, are not environmental impacts for the purpose of CEQA. (See *Joshua Tree Downtown Business Alliance v. County of San Bernardino (*2016) 1 Cal.App.5th 677, 685*; Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492*; Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 376.)

Economic effects may be relevant only where substantial evidence demonstrates that they would result in a reasonably foreseeable physical change to the environment, such as physical deterioration or urban decay. The comment does not provide substantial evidence demonstrating that the project would cause such an effect.

The CEQA document evaluates the proposed project's potential physical effects, including land use compatibility, air quality, noise, transportation, hazardous materials, and other applicable environmental topics. Concerns regarding the retention or protection of existing industrial businesses may be considered by the City as part of its broader land use and policy decision-making process, but they do not constitute environmental impacts under CEQA.



The commenter argues that potential indirect impacts to existing businesses including reduction in service capacity, displacement, and altered operational patterns could result in downstream economic impacts and result in the business needing to relocate. This assumption is speculative. A business decision by the commenter to relocate their business to another site to improve their operational efficiency is at the discretion of the business and would not be an impact of the proposed project on the environment. Additionally, future action or inaction by private property owners is not a reasonably foreseeable impact without evidence in the record to support such a presumption. (See *Save the El Dorado Canal v. El Dorado Irrigation District* (2022) 75 Cal.App.5th 239, 263 – 64.) Economic impacts on a small group of private businesses are not physical environmental impacts under CEQA and as such, the Draft EIR is not required to analyze the proposed project's potential economic impacts to nearby businesses, nor any impacts that are not a reasonably foreseeable impact as a result of the proposed project.

The comment letter provided by WVCC includes an Economic and Operational Impact Memorandum prepared by Kosmont Companies that purportedly evaluates "the relationship between industrial viability and environmental outcomes, including implications for public infrastructure services." Much of the evidence cited is related to the economic importance of industrial activity as a general matter. The letter claims industrial businesses in California are "frequently forced to scale back, relocate, or shut down entirely following residential complaints over odors, noise, and pollution." This comment presents generalized, uncertain, and hypothetical predictions of future actions and does not present any specific facts showing a localized, likely physical impact resulting from the proposed project. The comment also does not acknowledge the specific conditions of the neighborhood surrounding the project site, specifically the operation of businesses, including WVCC, in close proximity to the Paseo de Palomas residential community, homes on West Valley Drive, the larger Campbell Village neighborhood, and Edith Morley Park. These uses have co-existed for more than fifty years without documented displacement. Lead agencies are not required to "dimly guess" at or further analyze such consequences. (*Santa Rita Union Sch. Dist. v. City of Salinas* (2023) 94 Cal.App.5th 298, 349.) The comment letter does not provide substantial evidence to support its assumptions nor require further environmental analysis under CEQA.

2.3.4 Topical Response No. 4: Alternate Site Access

Several commenters suggested a project with alternate site access configurations and site designs should be included in the alternatives analysis including providing primary access through the emergency vehicle access (EVA) easement on Paseo de Palomas Lane or adding an additional access point through Cristich Lane.

Alternatives considered and analyzed in the Draft EIR are included in Section 5.0, Alternatives to the Proposed Project, of the Draft EIR. Alternatives analyzed in the Draft EIR included the No Project No Development Alternative and the No Project Future Development Alternative. Additionally, the Draft EIR considered but rejected one alternative identified as the Mixed Use Alternative due to infeasibility due to the project site location and increased impacts related to transportation and noise.

The alternatives analyzed in the Draft EIR are derived from the proposed project's significant impacts. This is in compliance with CEQA Guidelines, which requires a lead agency's alternatives analysis to focus on alternatives that "would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." (CEQA Guidelines, Section 15126.6, subd. (a); *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 565; *In re Bay-Delta etc.*



(2008) 43 Cal.4th 1143, 1163.) A lead agency need not consider alternatives designed to address impacts that the Draft EIR does not identify as significant. (See CEQA Guidelines, Section 15126.6, subd. (f) [lead agency may eliminate alternatives from detailed consideration if they fail to avoid or substantially lessen significant environmental effects].) The record and analysis provided in the Draft EIR does not support analyzing additional alternatives. As outlined in the Draft EIR, the proposed project was determined to not have any significant and unavoidable impacts and all potentially significant impacts were reduced to less than significant with implementation of mitigation measures identified in the Draft EIR. As such, the alternatives analyzed in the Draft EIR included the traditional "No Project Alternative" where no development would take place and existing uses would continue, and the "No Project Future Development Alternative" which analyzed the potential impacts that could result if the project site was developed in accordance with the uses envisioned in the City's 6th Cycle Housing Element and 2040 General Plan.

As the Draft EIR did not identify any significant impacts related to site access, CEQA does not require the Draft EIR to evaluate alternatives specifically designed to modify the proposed project's site access configurations. As such, alternatives related to providing additional site access points or reconfiguring the site design to allow for an additional access point other than from Campbell Technology Parkway were not required to be considered.

Nonetheless, the City did consider alternative project access via Cristich Lane and/or Paseo de Palomas during the project application review process. However, Paseo de Palomas and Cristich Lane are private streets and are therefore not available to provide public access to the proposed project without the underlying fee owners granting appropriate rights, which has not happened. Therefore, in addition to not being required under CEQA, the commenter's proposed alternative is legally infeasible, and need not be considered. (See, e.g. *Kenneth Mebane Ranches v. Superior Ct.* (1992) 10 Cal. App. 4th 276, 292.)

Statements that Campbell Technology Parkway is the only ingress/egress route to the project site are incorrect. The project site includes an EVA easement connection to Paseo de Palomas that can accommodate emergency vehicle access if needed. For more details, please see Topical Response No. 6 - Emergency Access and Response, below. The EVA easement can be seen on Figure 2-10 of the Draft EIR. Retaining this connection for emergency access while providing primary site access via the existing public street network is appropriate given the surrounding land uses and roadway conditions.

Whether the City will further evaluate opportunities to extend Cristich Lane to Campbell Technology Parkway as part of a broader future, independent transportation planning effort is beyond the scope of the proposed project and does not alter the conclusions of the Draft EIR's transportation analysis or the determination of a less than significant transportation impact under CEQA.

2.3.5 Topical Response No. 5: Conflicts with Existing Industrial Uses and Operations

The commenter stated that the project site is located in an active industrial corridor and would result in conflicts with existing industrial uses and operations in the area. The commenter stated the Draft EIR does not evaluate how the introduction of residential uses will affect existing business operations in the area nor does it assess the reciprocal effects of these operations on the proposed residential use. Additionally, the commenter stated the Draft EIR fails to evaluate the foreseeable indirect impacts arising



if existing operations were to be constrained as a result of land use conflicts, including the potential displacement, relocation, or modification of industrial activities.

The commenter's description of the area being an active industrial corridor is not accurate and the commenter has not provided any evidence to support its claim that the proposed project could cause a significant environmental impact due to conflicting land uses. Uses surrounding the project site are characterized as a mix of predominantly commercial and residential uses with some industrial uses. As described in Section 2.1.5, Surrounding Land Uses, of the Draft EIR, land uses surrounding the project site include residential and commercial uses. The residential uses in the project's vicinity are substantial. Directly east of the project site is Paseo de Palomas, a senior living residential community, has existed in the area since 1967. Additionally, the Campbell Village neighborhood is located approximately 1,000 feet south of the project site which is a residential area of over 400 single family homes. As identified in the Campbell Village Neighborhood Plan, the Campbell Village neighborhood was developed in several phases starting in the 1940s. These existing residential uses identified to be located adjacent to or within the vicinity of the project site existed prior to many of the industrial businesses that now reside in the area.

The language in the provided comments that the area is an "industrial corridor" is not supported by any City adopted planning documents including the City's General Plan, General Plan EIR, and Municipal Code. As identified in Section 3.5, Land Use and Planning, of the Draft EIR, under the adopted 6th Cycle Housing Element and 2040 General Plan, three of the project site parcels were redesignated from R&D to HD MU, which generally consists of residential uses as provided for by the High Density Residential land use designation and commercial uses as provided for by the General Commercial land use designation. As such, the project site is designated for high density residential uses by the City. The commenter's assertion that the area is designated for industrial use is based on a land use plan that was proposed by the City over 25 years ago in the 2001 General Plan. The City's anticipated growth and land uses have changed drastically over the last 25 years due to market conditions and changes over time and as such, the most recent iteration of the City's General Plan and Housing Element identified the project site for residential uses.

As noted above, there is also a substantial number of commercial uses in the project vicinity. These consist of dozens of commercial businesses, including commercial service businesses (e.g., auto repair), business support services, professional offices (e.g., insurance and architectural services offices), gyms and fitness studios, pet grooming services, and medical care providers. The area has a diverse mix of uses which have co-existed for decades without presenting any safety issues or other incompatibility impacts. Each of the Draft EIR's environmental analysis, as discussed in greater detail below in Topical Response No. 7 – Environmental Setting, Baseline Conditions, fully accounts for nearby industrial uses (and other non-residential uses). Where appropriate, the Draft EIR identifies impacts of the proposed project and the surrounding uses under cumulative conditions and other respects. Additionally, the Draft EIR, accounting for the project site's surrounding uses, provides an analysis of potential land use compatibility issues under Impact LU-b under Section 3.5, Land Use and Planning. The analysis provided on pp. 3-124 to 3-126 of the Draft EIR addresses a full array of compatibility considerations, including air quality and noise considerations, and determined nearby non-residential uses could co-exist with the proposed project, without violating any environmental thresholds of significance. Evidence is provided that the Draft EIR's analysis accounted for nearby industrial uses, such as in the Draft EIR's air analysis (see Table 3.1-10 and Table 3.1-11 of the Draft EIR, where nearby light industrial uses are identified) and



the Draft EIR's noise analysis (see Table 3.6-6 of the Draft EIR, where project effects were measured in the context of ambient noise, which necessarily accounted for noise from all nearby uses). All of the NOP comments that raise issues concerning nearby industrial uses are also memorialized and addressed in Section 1.0 of the Draft EIR, under Table 1.2-1, and Appendix B to the Draft EIR. As such, the assumption that the Draft EIR did not account for nearby industrial uses, or that the proposed project would increase conflicts with nearby industrial business operations is unfounded. Additionally, impacts on a private business and its operations are not physical environmental impacts under CEQA and as such, the Draft EIR is not required to analyze the proposed project's potential operational impacts to nearby businesses.

The commenter argues that the Draft EIR fails to analyze potential operational impacts to existing businesses and the potential indirect impacts arising from operational conflicts, such as relocation and modifications to their existing operations.

The business has operated adjacent to existing residential communities for many years. The assumption that the proposed project would increase conflicts with the business operations is speculative and contradicted by evidence provided in the Draft EIR. CEQA requires evaluation of the proposed project's potential physical effects, including land use compatibility, air quality, noise, transportation, hazardous materials, and other applicable environmental topics. The commenter asserts that the land use conflicts or incompatibility would create or exacerbate pedestrian safety issues, bicycle safety issues, or transportation hazards. However, as shown by the analysis provided under Impacts TRANS-a and TRANS-c of the Draft EIR, there is not substantial evidence in the record to support the commenter's conclusion. To the extent there are any claims that the proximity of industrial and project uses create air, noise, or other impacts, the Draft EIR shows otherwise (as explained above).

The Draft EIR properly analyzes the impacts that the proposed project may have on the surrounding physical environment that have the potential to adversely affect the general public. Regarding the commenter's claims of indirect impacts, they are addressed above and also in Topical Response No. 3 – Economic Impacts to Existing Businesses, Topical Response No. 8 – Baseline Conditions, Environmental Setting, and Topical Response No. 2 – Pedestrian and Bicycle Safety.

2.3.6 Topical Response No. 6: Emergency Access and Response

Several comments were received related to emergency access and response. Specifically, WVCC's comment letter dated 6/1/2026 stated that the City's staff report states that secondary emergency access to the site has not been secured or designed. The commenter states the City's staff report concludes that secondary emergency access is required but has not been secured or demonstrated and the Draft EIR does not analyze whether the EVA easement identified is legally available, physically feasible, or capable of supporting reliable emergency access under operating conditions. The commenter states the emergency access is contingent on compliance with City standards "subject to an AMMR".

The staff report that the commenter references is the City's Staff Report dated June 13, 2023, which was prepared to support the Preliminary Application Study Session for the proposed project. The Staff Report was prepared when the proposed project application was first submitted to the City and is based on outdated information. The statement that the June 2023 Staff Report notes that the County Fire District determined that secondary EVA to the site is required in addition to the primary access through Campbell



Technology Parkway, and the applicant would need to demonstrate that they have a legal right to use that easement and that the roadway would satisfy minimum design requirements is correct. In response to such feedback, the applicant secured emergency access to the site that satisfies the City's design requirements, and during the application completeness process which concluded in September 2023, access routes to the project site were clarified.

The EVA easement through the Paseo de Palomas property is an existing easement that serves the existing office campus located at the project site. The EVA easement through Paseo de Palomas was executed on June 2, 1999, and grants the City an easement for emergency vehicle access, as well as for drainage purposes. The County Fire Department reviewed the project plans and provided their approval in a Development Review Comment Letter from February 2024. The County Fire comment letter confirmed documentation was provided for EVA easement along Paseo de Palomas Lane and notes that the EVA easement on Paseo de Palomas Lane meets the fire access roadway requirements. Figure 2-10 of the Draft EIR shows that the primary fire access point to the project site is through Campbell Technology Parkway with a secondary fire access point located within the existing easement on Paseo de Palomas. This EVA exceeds the 20-foot minimum width under SCCFD A-1, Section II.A, and the two fire access roads satisfy the separation requirement under Section V.A (995 feet between centerlines versus 900 feet required). The proposed project provides two fire apparatus access roads of the type and dimensions required by SCCFD A-1, Section IV.B, for multi-family projects exceeding 100 dwelling units. No provision of the California Fire Code, the SCCFD standards, or the Campbell Municipal Code requires a third access road or a standalone evacuation plan beyond the access configuration analyzed in the Draft EIR.

The Alternative Materials and Methods Request (AMMR) approval pertains to a separate issue involving aerial apparatus access to certain buildings and is separate from the EVA easement. Specifically, because some of the buildings do not have compliant aerial apparatus access, the developer is providing enhanced fire sprinkler protection as an alternative means to achieve the same level of protection to allow time for emergency response and access. The AMMR was approved by the County Fire District in September 2024. The Draft EIR's project description accurately describes the proposed access configuration for the project site and the EVA access. Access through the EVA easement on Paseo de Palomas is not contingent or conditional as stated by the commenter. The required access roads and driveways are documented and meet applicable standards including roadway width and truck turning radii. The Draft EIR's discussion of the proposed access configuration and its conclusion that the proposed project would not result in inadequate emergency access or associated impacts is supported by facts in the record.

2.3.7 Topical Response No. 7: Environmental Setting, Baseline Conditions

The commenter stated the Draft EIR did not adequately describe the environmental setting or existing baseline conditions in the project vicinity stating the Draft EIR lacked information regarding existing industrial uses and operations in the area.

As required by CEQA Guidelines, the Draft EIR must describe the environmental setting for the project, which is made up of the physical environmental conditions in the vicinity of the proposed project. Under CEQA Guidelines, the "environment" refers to the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of



historic or aesthetic significant. One of the purposes of describing the environmental setting is to ensure the baseline conditions that exist at the time of release of the NOP are identified and to ensure that environmental impacts can be measured. The environmental setting and baseline for the proposed project utilized in the Draft EIR includes information regarding nearby uses and operations as they relate to land uses, air emissions, and existing noise conditions. The commenter's assertion that the environmental baseline should include specific business operations, specifically the types of services provided and hours of service, is not valid under CEQA as operational features of a business is not considered part of the "environment" outside of how they related to land use, air, and noise.

The commenter states the Draft EIR did not adequately describe the environmental setting or baseline conditions and lacked information regarding existing industrial uses in the area. The commenter points to sections of Draft EIR's project description, in which adjacent properties were described (pp. 2-18 and 2-22 of the Draft EIR). This description of adjacent properties indicates the project site is bounded by SR-17, single-family development to the east, and commercial uses to the south. This information is accurate as there is a mobile home park community to the east of the project site, consisting of more than 100 residences, and an office building to the south of the project site.

The larger project vicinity is completely and consistently acknowledged, and accounted for, in the environmental analysis. Specifically, the Draft EIR notes the presence of commercial and light industrial uses in the vicinity of the project site in several locations including Section 1.0, Introduction, Section 3.1, Air Quality, Section 3.5, Land Use and Planning, Section 3.6, Noise, and Appendix B of the Draft EIR.

Impact AIR-c under Section 3.1, Air Quality, of the Draft EIR identifies facilities within 1,000 feet of the project site which are identified as permitted stationary sources of emissions in the project area to determine potential health risks posed to the proposed project from nearby industrial and commercial uses. Many industrial uses, for instance, are specifically identified in Table 3.1-10 and Table 3.1-11 of the Draft EIR, including the commenter's businesses. Impact LU-b under Section 3.5, Land Use and Planning, of the Draft EIR includes an analysis of potential conflicts that could occur with existing commercial and industrial land uses in the vicinity of the project site due to inconsistent land uses (Draft EIR pp. 3-124 to 3-126). Additionally, as identified in Section 3.6.1, Environmental Settings, of the Draft EIR, a community noise survey was conducted in February 2025 which consisted of documenting noise levels at and around the project site by taking noise measurements during daytime and nighttime hours at several locations to determine the current ambient noise levels at the site from existing nearby uses including the commercial and industrial uses in the area. Table 1.2-1 and Appendix B also acknowledge and address information received during the NOP process that the area has industrial uses. As such, the existing industrial operations were observed, accurately described, and considered in the Draft EIR analysis and were included in the environmental baseline. As such, the environmental setting and baseline provided in the Draft EIR is accurate and adequate for the purposes of CEQA.

Additionally, the commenter is not correct that the larger project vicinity is dominated by industrial uses. To the east of the project site, a number of residential developments and projects exist, including the Paseo de Palomas mobile home community, the Union Manor Apartments, and the Woodleaf Apartments. To the south, beyond the southerly frontage of East McGlincy Lane, the Campbell Village Neighborhood has existed for decades. There are other residential homes along East McGlincy Lane. Further, and as noted previously, there is also a significant number of commercial uses in the project vicinity, including commercial service businesses (e.g., auto repair), business support services,



professional offices (e.g., insurance and architectural services offices), gyms and fitness studios, pet grooming services, and medical care providers. The area has a diverse mix of uses, and it is not accurate to identify it as an industrial corridor. The Draft EIR is conscious of this fact and, when a particular existing use was pertinent to an environmental analysis, the Draft EIR clearly identified the nature of those uses and, where relevant, the distance between them and the project site.

The commenter stated the Draft EIR excludes actual roadway conditions resulting in an incomplete environmental baseline and provided independent traffic counts. The transportation analysis (provided as Appendix G to the Draft EIR) included existing traffic counts along East McGlincy Lane, which indicated average daily traffic volumes of approximately 1,800 vehicles. The traffic counts referenced by the commenter indicate average daily volumes ranging from approximately 1,570 to 1,750 vehicles. These volumes are generally consistent and reflect similar existing traffic conditions. Additionally, the transportation analysis included vehicle classification data based on standard Federal Highway Administration (FHWA) classification methods. The project counts identified approximately 21 percent Class 3–4 vehicles and approximately 5–6 percent Class 5–13 vehicles. By comparison, the independently conducted counts referenced by the commenter identified approximately 18 percent Class 3–5 vehicles and approximately 2 percent Class 5–13 vehicles. Overall, the datasets are generally consistent in magnitude and distribution. Class 3 and Class 4 vehicles are typically categorized as light-duty and medium-duty vehicles (e.g., vans, pickups, and small commercial vehicles), rather than heavy trucks. Heavy truck classifications for transportation studies generally correspond to FHWA Class 5–13 vehicles, which include single-unit trucks and combination tractor-trailers. The traffic counts provided by the commenter does not provide substantial evidence to support their assertion that the Draft EIR is based on an incorrect environmental baseline or environmental setting.

Some of the comments suggest that unsafe roadway operations constitute part of the environmental setting and baseline. The City's traffic consultants have evaluated the roadway and did not observe improper or unsafe traffic operations on local roadways. The applicant reports that it, neither, has observed any such behavior. While there might be isolated instances when unlawful or unsafe operations occur, it is improper to assume unlawful operations, once identified, will be permitted to continue. CEQA is clear, under PRC Section 21174, that its environmental review laws shall not be employed as "a limitation or restriction on the power or authority of any public agency in the enforcement or administration of any provision of law which it is specifically permitted or required to enforce or administer." Civil Code Section 3517 underscores that "[n]o one can take advantage of their own wrong." Finally, unlawful or unsafe traffic activities occur on all City streets, and the City of Campbell's Police Department Traffic Unit is charged with enforcement of vehicle safety laws. If unlawful activities are occurring on streets in the vicinity of the project site, there is no evidence they occur at a frequency greater than incidents on other roadways (see the prior discussion about collision data in Topical Response No. 2 - Pedestrian and Bicycle Safety), and it is a reasonable assumption that the Police Department's Traffic Unit will enforce City laws and regulations.

2.3.8 Topical Response No. 8: VMT Analysis

The commenters stated the Draft EIR's VMT analysis is inadequate and not supported by substantial evidence as the use of the screening threshold leads to an incomplete analysis.



The City's VMT analysis was prepared in accordance with SB 743, Section 15064.3 of the CEQA Guidelines, and the City's adopted VMT Policy, as amended in April 2024. Under the City's VMT Policy, projects that meet established screening criteria, including consistency with the General Plan and proximity to high-quality transit, are presumed to result in less than significant VMT impacts. This screening approach is consistent with CEQA Guidelines Section 15064.3(c), which provides that projects located within 0.5-mile of a major transit stop or high-quality transit corridor are generally presumed to have a less than significant transportation impact.

The City's VMT Policy establishes objective eligibility criteria for application of these screening thresholds. The policy does not require evaluation of individual pedestrian path-of-travel conditions or specific infrastructure improvements to determine eligibility. Rather, it relies on defined proximity and consistency standards adopted by the City for implementation of SB 743. In addition, CEQA Guidelines Section 15064.3 allows lead agencies to rely on screening thresholds as part of a streamlined VMT evaluation where applicable. Where a project meets adopted screening criteria, a separate project-level VMT calculation is not required.

The proposed project's VMT analysis was completed in accordance with City and state guidelines for VMT. As identified in Section 3.7, Transportation, of the Draft EIR under Impact TRANS-b, the proposed project applies the Transit Screening criteria identifying that the project site is within 0.5-mile of the Winchester light rail transit station and is also located within 0.5-mile of the South Bascom Avenue and Surrey Place bus stops, which include Routes 26 and 61, running 15 and 20 minute intervals respectively during peak periods. As outlined in the Draft EIR, the City's VMT policy specifies that land use projects located within 0.5-mile of a light rail station shall be presumed to have a less than significant transportation impact on VMT presuming these projects are consistent with the General Plan. The City's VMT policy complies with state law requirements including CEQA Guidelines Section 15064.3, which states: "generally, projects within 0.5-mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact." As outlined under Impact TRANS-b in Section 3.7, Transportation, of the Draft EIR, distance to transit for purposes of VMT evaluation is measured by straight-line distance. Based on the City's adopted VMT Policy and applicable CEQA Guidelines, the proposed project is presumed to result in a less than significant transportation impact.

Additionally, the commenter stated the Draft EIR's use of straight line distance to calculate proximity to transit is incorrect. However, straight line distance is the metric used by the City's adopted VMT Policy. It is also the metric used by the California Department of Housing and Community Development in interpreting the path of measurement to a major transit stop, as evidenced by a Letter of Technical Assistance it provided to the City of San Clemente dated November 17, 2023, where it states "the one-half mile to a major transit stop should be measured in a straight, direct line from the nearest edge of the parcel containing the project site to any point on the parcel(s) that make up the property upon which a major transit stop is located" (p. 2 to 3) (HCD 2023).

From a policy standpoint, a straight-line methodology is appropriate because CEQA Guidelines Section 15064.3 does not require, let alone provide guidance regarding, separate measurement of the specific pedestrian route to/from a major transit stop, and VMT screening does not assume that all transit users from a project will be pedestrians. The use of an objective and clear standard of 0.5-mile distance supports overall proximity of a project to transit. Some portion of transit users will consist of those who



drive the short distance to a nearby transit stop, especially where there is ample parking. The Downtown Campbell Light Rail Station is located in the vicinity of more than 1,000 parking spaces that are available for use. As such, considerable VMT savings are expected even in situations where project residents drive a short distance to a transit stop and proceed with the remainder of their commute to Bay Area cities, some of which are located dozens of miles away, using transit.

2.4 RESPONSES TO COMMENTS

In accordance with the CEQA Guidelines Section 15088, the City of Campbell, as the lead agency, evaluated the comments received on the Draft EIR (State Clearinghouse No. 2024121066) for the Campbell Tech Park Project, and has prepared the following responses to the comments received. This Response to Comments document becomes part of the Final EIR for the proposed project in accordance with CEQA Guidelines Section 15132.

The verbal and written individual comments received on the Draft EIR are provided as Appendix A to this Final EIR and the responses to those comments are provided below. The comment letters and verbal comments made at the Planning Commission meeting are reproduced in their entirety in Appendix A. All comments are indicated by a line bracket and an identifying number in the margin of the comment letter.

2.4.1 Response to Comment CL-LJ: John Kunkle – Lisjan Nation

Response to Comment CL-LJ-1

The commenter stated the project does not land within their traditional territory and deferred to Tribal Chairwoman of the Tamien Nation.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.2 Response to Comment CL-PGE: PG&E Plan Review Team

Response to Comment CL-PGE-1

The commenter stated they will review the submitted plans in relationship to any existing PG&E facilities in the area and if the project is determined to be adjacent or within PG&E property, they will work to ensure compatible use. Attachments provided include requirements related to gas facilities, requirements related to electric facilities, and PG&E's Plan Review Step by Step Guide.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. The proposed project will be constructed and operated in accordance with applicable PG&E requirements. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision



to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-PGE-2

The commenter outlined the information and attachments provided as part of the comment letter and provided additional information regarding PG&E's review process and application process for gas or electric service needs.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. The proposed project will be constructed and operated in accordance with applicable PG&E requirements. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-PGE-3

The commenter stated any uses within PG&E's fee strip or easement may include a CPUC Section 851 filing and noted PG&E will advise if the filing is required.

The commenter outlined PG&E requirements that are applicable to the proposed project. The comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. The proposed project will be constructed and operated in accordance with applicable PG&E requirements. As such, no further response is required.

Response to Comment CL-PGE-4

The commenter stated this letter does not constitute PG&E's consent to utilize any portion of PG&E land for purposes not previously granted and stated they would provide project specific response as required.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.3 Response to Comment CL-PGE2: Kevin Wun - PG&E

Response to Comment CL-PGE2-1

The commenter expressed gratitude for the opportunity to review the project and stated the project site is in the same vicinity as PG&E's existing facilities that impact the property.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments



received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-PGE2-2

The commenter stated they have no comment on the adequacy of the Draft EIR but noted the Draft EIR does not make note of PG&E's existing electric and gas facilities within the project boundary and stated the Applicant is to ensure the development of the project complies with the attached PG&E guidelines for projects near PG&E's electric and gas facilities.

The commenter outlined PG&E requirements that are applicable to the proposed project. The proposed project will be constructed and operated in accordance with applicable PG&E requirements. The comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. As such, no further response is required.

Response to Comment CL-PGE2-3

The commenter stated the Applicant is to provide development plans to PG&E's Plan Review Team for comment when available.

The commenter outlined PG&E requirements that are applicable to the proposed project. The proposed project will be constructed and operated in accordance with applicable PG&E requirements. The comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. As such, no further response is required.

Response to Comment CL-PGE2-4

The commenter provided contact information for any modification or relocation requests, or for additional service requests.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-PGE2-5

The commenter outlined PG&E's requirement for any digging or excavation work prior to commencement of any work.

The commenter outlined PG&E requirements that are applicable to the proposed project. The comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. The proposed project will be required to comply with applicable PG&E requirements. As such, no further response is required.



Response to Comment CL-PGE2-6

The commenter provided contact information in case the City has questions or would like to discuss the comments provided.

The City appreciates inclusion of contact information; however, general comments providing contact information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.4 Response to Comment CL-SLandry: Susan Landry

Response to Comment CL-SLandry-1

The commenter stated the Draft EIR missed the point in their comment provided during the NOP scoping period. The commenter provided a map to show where they think impacts will occur in the vicinity related to transportation and provided suggestions for improvements. The commenter stated the Draft EIR does not address their concerns of traffic impacts resulting from cut through traffic in the neighborhood and questioned why the Draft EIR does not address these impacts. Specifically, the commenter questions why it does not mention traffic along Curtner and questions what the boundaries are for the area of influence.

The City notes the suggestions provided by the commenter related to improvements to the roadways. Refer to Topical Response No. 1 for response to comment regarding increased traffic impacts within the vicinity of the project site.

2.4.5 Response to Comment CL-SLandry2: Susan Landry 2

Response to Comment CL-SLandry2-1

The commenter provided clarification on their comment provided in-person at the Draft EIR Public Comment meeting. The commenter states the Draft EIR does not evaluate cut through traffic in the area and states morning traffic conditions in the area already cause traffic to back up and the increase in traffic from the project would further exacerbate the issue.

Refer to Topical Response No. 1 for response to comment regarding increased traffic impacts within the vicinity of the project site.

Response to Comment CL-SLandry2-2

The commenter stated the increase in traffic in the neighborhood raises safety concerns due to lack of sidewalks and bike lanes, as well as cars exceeding the speed limits during their commute.

Safety impacts related to roadways are analyzed in Section 3.7, Transportation, of the Draft EIR. As outlined in the Draft EIR analysis, the proposed project would not result in significant impacts related to safety. However, the analysis in Section 3.7, Transportation, of the Draft EIR did identify potentially significant impacts related to discontinuous sidewalks along Campbell Technology Parkway. As such,



Impact TRANS-a identified Mitigation Measure TRANS-1 to reduce potential impacts. Mitigation Measure TRANS-1 required improvements along Campbell Technology Parkway to reduce potential impacts related to discontinuous sidewalks. With implementation of Mitigation Measure TRANS-1, potential safety impacts related to discontinuous sidewalks was reduced to a less than significant level. Additionally, refer to Topical Response No. 2 for response to comment related to pedestrian and bicycle safety.

2.4.6 Response to Comment CL-SLandry3: Susan Landry 3

Response to Comment CL-SLandry3-1

The commenter provided comments regarding Draft EIR Section 3.7.1 stating that it does not mention Curtner Avenue which needs to be evaluated. The commenter noted the intersection of Curtner and McGlincy is a 3-way stop and notes morning traffic is already bad on McGlincy and the Camden/Curtner Avenue intersection. The commenter stated the increase in traffic from the project will worsen backup and cars will go around Union then cut through Campbell Village to get onto Curtner. The commenter stated that the impacts along Curtner, Camden, and McGlincy need to be identified and addressed in the EIR.

Revisions to the Draft EIR have been completed to include a description of Curtner Avenue in Section 3.7, Transportation, of the Draft EIR. Revisions completed as a response to the comment received did not change the conclusion of the analysis provided in the Draft EIR. These revisions do not include identification of a new significant impact, a substantial increase in the severity of an impact, or a feasible alternative or mitigation measure that is considerably different than those analyzed. Therefore, recirculation of the Draft EIR is not required. Revisions to the Draft EIR made as a result of comments received on the Draft EIR can be found in Section 3.0, Revisions to the Draft EIR, of this Final EIR document. Additionally, refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site.

Response to Comment CL-SLandry3-2

The commenter provided comments during the NOP process and stated the EIR includes an incomplete summary of their comments, and it is missing their concerns about traffic backup at Curtner and McGlincy. The commenter stated the impact to Campbell Village needs to be identified and addressed in the EIR.

Comments received during the NOP process were summarized in Table 1.2-1 of the Draft EIR. The table includes a summary of the comments received and identifies the section of the Draft EIR where the comment is addressed. If the comments were determined to be related to CEQA and the proposed project, it was responded to in the Draft EIR. Section 3.7, Transportation, of the Draft EIR analyzed the proposed project's potential impacts related to nearby roadways. Additionally, see Topical Response No. 1 for a response related to increased traffic congestion and backup within the vicinity of the project site.



2.4.7 Response to Comment CL-TClements: Tony Clements

Response to Comment CL-TClements-1

The commenter stated they live in the area and this project would impact quality of life he signed up for.

Impacts to the physical environment are disclosed in the Draft EIR. The commenter provided a general statement that does not provide any specific comments regarding the adequacy or accuracy of the Draft EIR's coverage of physical impacts. General comments providing one's opinion, including impacts to quality of life, does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. Additionally, any alleged impacts that solely affect a single individual, as opposed to the general public, are not environmental impacts for the purpose of CEQA. (See *Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 685; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492; *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 376.) Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-TClements-2

The commenter asked what is being done or planned for the influx of traffic in the area that would occur on already overloaded streets (Curtner/McGlincy) and questioned how the rush hour tie up that exists at the Curtner/Camden/Hwy 17 interchange going to be alleviated or addressed.

Refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site.

Response to Comment CL-TClements-3

The commenter asked what is being done for infrastructure (power, sewer, trash removal, road maintenance, internet service).

Impacts to existing utilities and infrastructure such as power and internet service are described and analyzed in Section 3.9, Utilities and Service Systems, of the Draft EIR. Impacts to trash removal was analyzed in the Initial Study (provided as Appendix A to the Draft EIR) and was scoped out of the Draft EIR as the Initial Study determined impacts would be less than significant; however, a summary of the analysis is also provided in Section 7.0, Effects Found Not to be Significant, in the Draft EIR. Any potential improvements completed to infrastructure and service systems in the vicinity of the proposed project are described in Section 2.0, Project Description, of the Draft EIR.

Response to Comment CL-TClements-4

The commenter asked how school children will be transported to and from school and which school the children will be attending.

Impacts to schools were analyzed in the Initial Study (provided as Appendix A to the Draft EIR) and was scoped out of the Draft EIR as the Initial Study determined impacts would be less than significant;

however, a summary of the analysis is also provided in Section 7.0, Effects Found Not to be Significant, in the Draft EIR. As identified in the Initial Study and Draft EIR, the proposed project would generate new school aged children and determined that the proposed project's residents would be located within the service area for Cambrian School District (K-8) and Campbell Union High School District. Additionally, students living at the new development would be within the boundaries of Bagby Elementary School, Price Middle School, and Branham High School and would be anticipated to attend the identified schools unless otherwise advised by the school districts. Residents would be anticipated to travel to and from school similar to other students in the area including driving, walking, bicycling, and utilizing public transportation. Finally, as indicated on p. 7-225 of the Draft EIR, SB 50 fees will be due, and are deemed appropriate as complete mitigation for school impacts. Under the terms of this statute, payment of statutory fees by property owners or property developers is considered to mitigate in full, for the purposes of CEQA, any impacts to school facilities associated with a qualifying project.

2.4.8 Response to Comment CL-VRacanelli: Vito Racanello – Roco's Gardening

Response to Comment CL-VRacanelli-1

The commenter stated their objection to the proposed project and stated they have significant concerns on the suitability of the project location.

The project site was chosen for development with the proposed project as the 6th Cycle Housing Element and 2040 General Plan adopted by the City designated the site for residential uses. The suitability of the site for development with a residential use was analyzed during the City's Housing Element process. Each site identified for residential development by the City's Housing Element was chosen after analysis of the site's suitability for residential development based on various factors such as proximity to transit, existing infrastructure, and surrounding land uses, including residential uses. The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-VRacanelli-2

The commenter stated the project underestimates the impact on existing businesses in the area and displacing or negatively impacting them without adequate mitigation could result in long-term economic and social consequences.

Refer to Topical Response No. 3 for response to comment regarding economic impacts to existing businesses in the area.



Response to Comment CL-VRacanelli-3

The commenter stated there are infrastructure limitations in the area which would raise serious concerns such as the project relying on a narrow single main access road already utilized by nearby businesses; creating more traffic congestion; safety impacts due to limited sidewalks; safety hazards due to longer response times; and concerns about increased accidents, noise complaints, and on-street parking.

With regards to commenter's concern about parking, as outlined in Section 2.2.8, Parking, of the Draft EIR, the proposed project would provide a total of 718 parking spaces onsite to accommodate the proposed residential development and would provide more parking spaces than required per Campbell Municipal Code Section 21.28.040. Of the total 718 parking spaces, 580 parking spaces would be provided as residential in-garage spaces and 138 spaces would be guest parking spaces dispersed throughout the site. As such, the project residents and any visitors would be anticipated to park within the project site and would not utilize street parking available along nearby roadways. The comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088. Additionally, refer to Topical Response No. 4 for response to comments related to alternate site access. Refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site. Refer to Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety. Additionally, see Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

2.4.9 Response to Comment CL-PTinto: Patricia Tinto – Paseo de Palomas Board of Directors

Response to Comment CL-PTinto-1

The commenter provided information regarding the history of Paseo de Palomas and the co-op, and its location next to the project site.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-PTinto-2

The commenter stated the project has a shared boundary with the existing neighborhood noted the existing buffer provided by a structural wall and large established trees. The commenter states it is important that the buffer continue to exist and be improved as part of the project.



As outlined in Section 2.2.1, Single-Family Homes, of the Draft EIR, the single family homes would be provided along the eastern edge of the project site and would be separated from the existing residential development to the east by existing trees and fencing located within the property line. As such, the existing buffer would continue to be located between the new proposed development and the existing residential uses to the east. Additionally, as outlined in Section 2.2.5, Open Space and Landscaping, of the Draft EIR, the proposed project would require removal of some existing trees located along the buffer in order to remove existing large trees which may be a hazard. However, the proposed project would comply with Campbell Municipal Code Chapter 21.32 - Tree Protection Regulations and would plant replacement trees along the buffer. As such, the proposed project would include improvements to the existing buffer. As the comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts, no further response is required.

Response to Comment CL-PTinto-3

The commenter stated they agree that replacing existing large trees that may be a hazard to both sides is necessary and endorse the Draft EIR's use of City requirements for tree removal and replacement as mitigation.

As outlined in Section 2.2.5, Open Space and Landscaping, of the Draft EIR, the proposed project would require removal of existing trees onsite and would comply with Campbell Municipal Code Chapter 21.32 - Tree Protection Regulations which outlines standards and regulations related to removal of protected trees. In accordance with City requirements, the proposed project would be required to obtain a Tree Removal Permit concurrently with the City processing the development application proposal, which would include requirement for replacement trees to be planted. As the comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts, no further response is required.

Response to Comment CL-PTinto-4

The commenter stated the mitigation measure included in the Draft EIR regarding pollution during construction meets their needs.

As outlined in Section 3.1, Air Quality, of the Draft EIR, the proposed project would be required to implement mitigation measures to reduce construction exhaust emissions to ensure impacts are reduced and nearby sensitive receptors are protected during construction. As the comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts, no further response is required.

Response to Comment CL-PTinto-5

The commenter stated they have no experience or data that challenge the assumptions or conclusions in the Draft EIR regarding wastewater and sewer system along Paseo de Palomas and as such, defers to the City and developers for assessing the impact.

Section 3.9, Utilities and Service Systems, of the Draft EIR includes an analysis of potential impacts related to wastewater and sewer systems, specifically regarding capacity for increased treatment.



Additionally, the Initial Study (provided as Appendix A to the Draft EIR) included an analysis of potential impacts to existing wastewater infrastructure. A summary of the analysis in the Initial Study is provided in Section 7.0, Effects Found Not to be Significant, in the Draft EIR. As the comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts, no further response is required.

Response to Comment CL-PTinto-6

The commenter stated the first alternative in the Draft EIR is not feasible and the second alternative would result in increased impacts from what is addressed in the Draft EIR and as such, support the Draft EIR's argument that the proposed project has the least significant impact.

The commenter expresses support for the proposed project and agreement with the comparative conclusions of the analysis of alternatives as provided in Section 5.0, Alternatives to the Proposed Project, in the Draft EIR. As the comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts, no further response is required.

Response to Comment CL-PTinto-7

The commenter stated they understand there are concerns regarding traffic patterns and notes that the cumulative projects could constitute an even bigger traffic problem. However, the commenter notes that they understand this issue is not a part of the Draft EIR other than what has been included and adequately addressed. However, they state they would like to be a part of any discussion that involves future traffic patterns.

The comment requesting to be a part of the discussion for future traffic patterns is noted by the City. Additionally, see Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site.

2.4.10 Response to Comment CL-Unknown: Unknown (hnh360@gmail.com)

Response to Comment CL-Unknown-1

The commenter provided statements expressing their opinion on and opposition of the project.

The comments are a general statement expressing the commenter’s opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.



2.4.11 Response to Comment CL-KBurg: Kenneth Burg – Bellcore Construction

Response to Comment CL-KBurg-1

The commenter stated their concerns with impact on traffic on the street from the new residential homes and provided suggestions for an alternate access through Cristich Lane or Paseo de Palomas to dilute traffic.

Refer to Topical Response No. 4 for response to comments related to alternate site access and refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site.

2.4.12 Response to Comment CL-ALiebelt: Aaron Liebelt – EmberWest Fireplace & Patio

Response to Comment CL-ALiebelt-1

The commenter stated they would like to bring to the City's attention that the project is unnecessary and will cause safety issues.

Impacts related to safety are discussed in several locations in the Draft EIR. Section 3.7, Transportation, of the Draft EIR includes Impacts TRANS-c and TRANS-d which analyze potential safety impacts related to increased hazards due to a design feature or incompatible uses, and impacts related to emergency access. Both impact analysis determined that impacts would be less than significant. Impact TRANS-c included Mitigation Measure TRANS-1 which requires parking restrictions at each driveway and pedestrian improvements which would allow for sight distance for exiting vehicles to be maintained and reduce potential safety impacts. Impact TRANS-d determined there would be no impacts related to emergency access as emergency vehicles would access the site via an existing EVA easement through the Paseo de Palomas Lane, which connects to Union Avenue and the proposed project's fire access plan shows that emergency vehicles would be able to access the project site via the proposed driveways and would be able to maneuver around the project site through specific streets within the site. Additional safety impacts were analyzed in Initial Study Section 3.9, Hazards and Hazardous Materials (provided as Appendix A to the Draft EIR), which determined that all safety impacts were less than significant. A summary of the analysis in the Initial Study is provided in Section 7.0, Effects Found Not to be Significant, in the Draft EIR. Additionally, see Topical Response No. 2 for response to comment related to pedestrian and bicycle safety.

Response to Comment CL-ALiebelt-2

The commenter stated the City has other large housing complexes completed in the last few years within proximity to the project site and asserts that most of these finished projects sit at half vacancies and as such, another housing project is not needed in the area.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision



makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-ALiebelt-3

The commenter stated the traffic in the area is currently tolerable but would not be once large equipment trucks are blocking the roadway from industrial operations and questions if the city will ticket them for double parking.

The proposed project and existing surrounding residential, commercial, and industrial uses would be required to comply with City standards and guidelines related to roadways. If a business or resident is identified to be operating in an illegal manner, such as blocking roadway access or double parking, the Campbell Police Department would have jurisdiction on ticketing the illegal operations and offence. Additionally, refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations and Topical Response No. 7 for a response related to environmental setting and baseline conditions regarding potential for trucks to block roadways.

Response to Comment CL-ALiebelt-4

The commenter stated McGlincy Lane cannot accommodate the increase of traffic that will occur from the project which will affect businesses and residents in the area.

Refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site.

Response to Comment CL-ALiebelt-5

The commenter stated there is a safety issue related to the fire department located at 123 Union Avenue as they witness the trucks using Union and McGlincy to respond to calls. The commenter questions how the trucks will be able to get through the traffic increase that would result from the project.

Refer to Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-ALiebelt-6

The commenter expressed their opinion that the project is not needed and stated it will cause undue traffic stress and create a safety issue regarding the fire department's ability to respond to calls.

The comments are a general statement expressing the commenter’s opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088. Additionally, see Topical Response No. 1 for a response related to increased traffic congestion and backup in the vicinity



of the project site and Topical Response No. 6 for a response to comment related to emergency access and response.

2.4.13 Response to Comment CL-FAdorno: Frank Adorno III – Adorno Construction

Response to Comment CL-FAdorno-1

The commenter stated they are the owner of Adorno Construction and stated their opposition of the project.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-FAdorno-2

The commenter stated his company along with others in the area depend on East and South McGlincy Lane for operation and the streets are heavily congested presently with delivery trucks frequently blocking portions of the roadway during operation. The commenter stated the project will introduce new traffic which will create ongoing conflict, increased congestion, parking issues, safety risks, and potential complaints against businesses in the area.

Alleged impacts that solely affect a single business, as opposed to the general public, are not environmental impacts for the purpose of CEQA (See *Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 685; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492; *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 376.) Additionally, refer to Topical Response No. 1 for a response related to increased traffic congestion and backup in the vicinity of the project site and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-FAdorno-3

The commenter expressed concerns about emergency access and evacuation for businesses and residents due to increased traffic from new residents.

Refer to Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-FAdorno-4

The commenter urges the Planning Commission to reject the project and preserve the area as an industrial area and existing businesses should not be placed at risk by an incompatible project.



The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088. Additionally, refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site, Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations, and Topical Response No. 6 for a response to comment related to emergency access and response.

2.4.14 Response to Comment CL-GMai: Glenna Mai – De Anza Water Conditioning, Inc

Response to Comment CL-GMai-1

The commenter stated their company operates in the project area relying on the existing industrial roadway access for operation and stated their opposition of the project.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Additionally, alleged impacts that solely affect a single business, as opposed to the general public, are not environmental impacts for the purpose of CEQA (See *Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 685; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492; *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 376.) Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-GMai-2

The commenter stated traffic, parking, and receiving shipments from trucks is difficult under current conditions on McGlincy and delivery trucks frequently blocking portions of the roadway during operation creating congestion and safety concerns. The commenter states the project will introduce new traffic which will worsen issues and the area lacks adequate sidewalks and safe pedestrian infrastructure creating concerns for drivers, bicyclists, pedestrians, and future residents. Additionally, the commenter expressed concerns about emergency access and evacuation for businesses and residents due to increased traffic from new residents.

Refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations. Additionally, see Topical Response No. 2 for a response to comment related to



pedestrian and bicycle safety and Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-GMai-3

The commenter urges the Planning Commission to consider the impacts that will occur on existing businesses and the safety challenges the project will create for everyone using McGlincy Lane.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088. Additionally, refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site, Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations, and Topical Response No. 6 for response to comment related to emergency access and response.

2.4.15 Response to Comment CL-JStreet: Jennifer Street – D&K Pest Control, Inc.

Response to Comment CL-JStreet-1

The commenter stated their company operates in the project area and expressed their concerns of the project.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-JStreet-2

The commenter stated their operation depends on McGlincy and delivery trucks frequently block the roadway. The commenter notes the only sidewalks are between Campbell Technology Parkway and Union Avenue and the roadway is dangerous for pedestrians, bicyclists, and drivers which raises traffic concerns with accidents, noise complaints about operation, and on-street parking. Additionally, the commenter expressed concerns about emergency access and evacuation for businesses and residents due to increased traffic from new residents.

Alleged impacts that solely affect a single business, as opposed to the general public, are not environmental impacts for the purpose of CEQA (See *Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 685; *Mira Mar Mobile Community v. City of*



Oceanside (2004) 119 Cal.App.4th 477, 492; *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 376.) Additionally, refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations, Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety, and Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-JStreet-3

The commenter urges the Planning Commission to consider the impacts that will occur on existing businesses and the safety challenges the project will create for everyone using McGlincy Lane.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.16 Response to Comment CL-TSyslo: Tim Syslo – Coastline Cabinets

Response to Comment CL-TSyslo-1

The commenter stated their company operates in the project area and expressed their concerns about the project.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-TSyslo-2

The commenter stated their operation depends on McGlincy and delivery trucks frequently block the roadway. The commenter notes the only sidewalks are between Campbell Technology Parkway and Union Avenue and the roadway is dangerous for pedestrians, bicyclists, and drivers which raises traffic concerns with accidents, noise complaints about operation, and on-street parking. Additionally, the commenter expressed concerns about emergency access and evacuation for businesses and residents due to increased traffic from new residents.

Alleged impacts that solely affect a single business, as opposed to the general public, are not environmental impacts for the purpose of CEQA (See *Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 685; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492; *Eureka Citizens for Responsible Government v. City of*



Eureka (2007) 147 Cal.App.4th 357, 376.) Additionally, refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations, Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety, and Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-TSyslo-3

The commenter urges the Planning Commission to consider the impacts that will occur on existing businesses and the safety challenges the project will create for everyone using McGlincy Lane.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.17 Response to Comment CL-KKlafter: Keith Klafter – Sequoia Cabinets

Response to Comment CL-KKlafter1

The commenter stated their company operates in the project area and expressed their concerns about the project.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-KKlafter-2

The commenter stated their operation depends on McGlincy and delivery trucks frequently block the roadway. The commenter notes the only sidewalks are between Campbell Technology Parkway and Union Avenue and the roadway is dangerous for pedestrians, bicyclists, and drivers which raises traffic concerns with accidents, noise complaints about operation, and on-street parking. Additionally, the commenter expressed concerns about emergency access and evacuation for businesses and residents due to increased traffic from new residents.

Alleged impacts that solely affect a single business, as opposed to the general public, are not environmental impacts for the purpose of CEQA (See *Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 685; *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492; *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 376.) Additionally, refer to Topical Response No. 5 for a response to



comment related to conflicts with existing industrial uses and operations. Additionally, see Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety and Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-KKlafter-3

The commenter urges the Planning Commission to consider the impacts that will occur on existing businesses and the safety challenges the project will create for everyone using McGlincy Lane.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.18 Response to Comment CL-MYoung: Mark Young

Response to Comment CL-MYoung-1

The commenter stated they are a property owner in the project area and expressed their concerns about the project.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-MYoung-2

The commenter stated their operation depends on McGlincy and delivery trucks frequently block the roadway. The commenter notes the only sidewalks are between Campbell Technology Parkway and Union Avenue and the roadway is dangerous for pedestrians, bicyclists, and drivers which raises traffic concerns with accidents, noise complaints about operation, and on-street parking. Additionally, the commenter expressed concerns about emergency access and evacuation for businesses and residents due to increased traffic from new residents.

Refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations. Additionally, see Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety and Topical Response No. 6 for a response to comment related to emergency access and response.



Response to Comment CL-MYoung-3

The commenter expressed their concern about how this project will negatively affect their ability to lease their property due to the impacts on traffic and accessibility that would result.

Refer to Topical Response No. 3 for a response to comment regarding potential economic impacts to existing businesses.

Response to Comment CL-MYoung-4

The commenter urges the Planning Commission to consider the impacts that will occur on existing businesses and the safety challenges the project will create for everyone using McGlincy Lane.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.19 Response to Comment CL-MYoung2: Mark Young – J&M Windows and Glass, Inc.

Response to Comment CL-MYoung-1

The commenter stated their company operates in the project area and expressed their concerns about the project.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-MYoung-2

The commenter stated their operation depends on McGlincy and delivery trucks frequently block the roadway. The commenter notes the only sidewalks are between Campbell Technology Parkway and Union Avenue and the roadway is dangerous for pedestrians, bicyclists, and drivers which raises traffic concerns with accidents, noise complaints about operation, and on-street parking. Additionally, the commenter expressed concerns about emergency access and evacuation for businesses and residents due to increased traffic from new residents.



Refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations. Additionally, see Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety and Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-MYoung-3

The commenter urges the Planning Commission to consider the impacts that will occur on existing businesses and the safety challenges the project will create for everyone using McGlincy Lane.

The comments are a general statement expressing the commenter's opinion on (or preference about) the proposed project. General comments expressing opposition to the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.20 Response to Comment CL-AM: Lorelei Alli – Amah Mutsun Tribal

Response to Comment CL-AM-1

The commenter provided their recommendations for addressing discovery of tribal resources during construction and provided their contact information for any questions or meeting to discuss consultation.

The commenter's recommendations are noted. As outlined in Section 3.2, Cultural Resources, and Section 3.8, Tribal Cultural Resources, of the Draft EIR, the proposed project identified Mitigation Measures CUL-1 through CUL-3 which outline requirements for discovery of unknown archaeological or cultural resources during construction. Mitigation Measures CUL-1 through CUL-3 include requirements such as completion of cultural sources sensitivity training prior to the start of any project related ground-disturbance activities, and stop work authority if tribal cultural resources or human remains are discovered during construction. With implementation of these mitigation measures, the Draft EIR determined impacts to tribal cultural resources would be less than significant. Additionally, the proposed project would be required to comply with applicable federal, state, and local guidelines and regulations related to tribal cultural resources. General comments providing recommendations for the proposed project do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This consideration is carried out independent of the environmental review process. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.21 Response to Comment CL-ValleyWater: Jaeho Hahn – Santa Clara Valley Water District

Response to Comment CL-ValleyWater-1

The commenter requested several revisions to the Draft EIR text on how Valley Water is referenced, outlined that the Water Supply and Infrastructure Master Plan referenced in the Draft EIR is no longer accurate and the currently planning document (Water Supply Master Plan 2050 adopted in 2030) should be utilized in the water supply analysis, and noted San Jose Water is in the process of adopting its 2025 UWMP and the Draft EIR should incorporate most current UWMP data.

The Draft EIR has been revised to update references to Valley Water and update any reference documents utilized in the Draft EIR analysis. Revisions completed as a response to the comment received did not change the conclusion of the analysis provided in the Draft EIR. Revisions to the Draft EIR made as a result of comments received on the Draft EIR can be found in Section 3.0, Revisions to the Draft EIR, of this Final EIR document. No "significant new information" is introduced that would warrant recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5.

Response to Comment CL-ValleyWater-2

The commenter provided contact information for any questions.

The commenter provided contact information in case the City has questions or would like to discuss the comments provided. The City appreciates inclusion of contact information; however, general comments providing contact information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.22 Response to Comment CL-SCCounty: Santa Clara County Roads and Airports Department

Response to Comment CL-SCCounty-1

The commenter expressed their appreciation for the opportunity to provide comments.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-SCCounty-2

The commenter requested plans for the proposed restriping improvements at the Camden Avenue/White Oaks Road/Curtner Avenue intersection be provided for review. The commenter requests information demonstrating how the restriping would address queuing issues identified in the Traffic Analysis to



determine if the improvements are sufficient to mitigate the identified queuing and operational impact. Additionally, the commenter noted the intersection may be within Caltrans jurisdiction and any improvements within Caltrans right-of-way (ROW) will require coordination and approval from Caltrans.

The comment that roadways are physically constrained is not accurate as area roadways are sufficiently wide to accommodate traffic from a mix of land uses and were constructed in accordance with City standards and requirements. The Draft EIR addresses vehicle queues and the proposed project's effect on them, as outlined in Section 3.7, Transportation, of the Draft EIR. In the traffic analysis supporting the Draft EIR, the analysis identifies two movements where the existing queues are currently substandard, meaning the queues exceed the available storage at the two given intersections (Draft EIR Appendix G, pp. 30-31). The proposed project's effect on the queues was determined to be negligible, lengthening these queues by one car length under existing conditions, and by two car lengths under the cumulative conditions. As such, there is no evidence the proposed project would result in significant queuing impacts. Minor striping is already proposed independently of the proposed project, which would minimize the one- to two-car queue addition of the proposed project. The transportation analysis (provided as Appendix G to the Draft EIR) evaluated an independent restriping improvement at the Camden Avenue/White Oaks Road/Curtner Avenue intersection to assess its effect on projected vehicle queuing. Under cumulative plus project conditions, the analysis shows that the restriping would reduce the eastbound left-turn queue by approximately one vehicle during both the AM and PM peak hours. The southbound right-turn queue would be reduced by approximately three vehicles during the AM peak hour and one vehicle during the PM peak hour.

All project plans, including for the roadway improvements, will be provided to the city and applicable reviewing agencies at the time of design review. Additionally, if the project's roadway improvements encroach into Caltrans jurisdiction, the improvements would be completed in accordance with all applicable requirements and would include coordination with Caltrans.

Response to Comment CL-SCCounty-3

The commenter requested the project contribute a fair share toward transportation improvements identified in the adopted Santa Clara County Expressway Plan 2008 specifically contributing toward the Plan's Tier 1A project, At-Grade Improvements at SR-17/San Tomas Expressway.

As outlined in Appendix G of the Draft EIR, proposed project traffic to the SR-17/San Tomas Expressway intersection is not expected to exceed 20 trips per hour, or an increase of less than a 0.5 percent, which is negligible and did not merit further analysis as it would continue to operate with sufficient capacity. The proposed project would be required to pay all applicable fees as required by the City in accordance with state law. Further, the requested fair-share contribution is not required as mitigation under CEQA as mitigation measures may be required only to address the significant environmental impacts of a project, and there must be an essential nexus and rough proportionality between any required measure and the project's impacts (CEQA Guidelines, Section 15126.4(a)(3); 15041(a)). The Draft EIR did not identify a potentially significant impact to the intersection in question with respect to CEQA purposes, as the contribution request is related to alleviating roadway congestion. Under CEQA, traffic congestion and automobile delay caused by a proposed project are not considered significant environmental impacts.



Response to Comment CL-SCCounty-4

The commenter provided contact information for any questions.

The commenter provided contact information in case the City has questions or would like to discuss the comments provided. The City appreciates inclusion of contact information; however, general comments providing contact information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.23 Response to Comment CL-VTA: Triana Crighton – Santa Clara Valley Transportation Authority

Response to Comment CL-VTA-1

The commenter expressed their appreciation for the opportunity to provide comments.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-VTA-2

The commenter stated their appreciation for Draft EIR's acknowledgements of the need for the project to leave an easement for a future potential bicycle and pedestrian bridge over SR-17 and supports the specific language in the Draft EIR's transportation analysis. The commenter recommends the City require this easement as a COA for the project and recommends the City and developer conduct outreach to future residents and surrounding neighborhoods about the overcrossing.

The requirement for the public access easement across the project streets to preserve bicycle and pedestrian access for a potential future bicycle and pedestrian bridge over SR-17 is included in Mitigation Measure TRANS-1 and as such, would be enforced by the City as a condition of the proposed project. It is not intended or needed to remedy a project impact, but to facilitate access to the overpass if and when it is ever constructed. General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.



Response to Comment CL-VTA-3

The commenter requested clarification on the reasoning for not including the SR-17 southbound on- and off-ramp intersections in the project's analysis, as the northbound ramps were included. The commenter also requested the Union Avenue/East McGlincy Lane intersection be included in the study, as the trip distribution map shows that 50 percent of trips utilize it.

As outlined in Appendix G to the Draft EIR, using the VTA's one-percent threshold, a freeway level of service analysis for SR-17 would be needed if the project would add 69 or more peak-hour trips to the freeway segments near the site. A review of the project trip assignment indicated that the greatest number of project trips in any direction on the subject freeway segment would be no more than 10 trips during the AM and PM peak hours. As such, the SR-17 southbound ramps are not expected to see a significant increase in the number of trips and is therefore unnecessary to examine this intersection further. For the comment regarding the Union Avenue/McGlincy Lane intersection, it is a signalized T-intersection where McGlincy Lane terminates, and has already been improved with sidewalks, pedestrian crosswalks, and corner ramps. As such, there is no evidence that additional traffic would cause any safety issues at this intersection. Additionally, refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site.

Response to Comment CL-VTA-4

The commenter stated intersection movement operation and queue analysis should use PTV VISTRO instead of TRAFFIX in accordance with VTA's 2025 transportation analysis Guidelines.

The two traffic methodologies address LOS, or congestion, which is not a CEQA topic. Both methodologies are equally adept at identifying whether an intersection might have a safety issue, and all intersections in the vicinity were separately assessed by traffic consultants for safety considerations, as outlined in Section 3.7, Transportation, and Appendix G of the Draft EIR. The methodology for the analysis utilized in the transportation analysis (provided as Appendix G to the Draft EIR) and Section 3.7, Transportation, of the Draft EIR is the appropriate methodology for analysis. The analysis utilized TRAFFIX as VTA's 2025 Transportation Analysis Guidelines was not adopted at the time of the NOP release, when the project's environmental review commenced. Separately, use of TRAFFIX is an established, credible methodology. It is understood that some agencies view PTV VISTRO as having a more modern interface, better integration with other PTV products, and the ability to produce outputs more compatible with CMP roadway analysis; however, TRAFFIX is adequate and utilized by a number of traffic engineering firms and public agencies, and its use for CEQA purposes is supported by substantial evidence. The City has the discretion to use this modeling software, but acknowledges that use of PTV VISTRO is preferred for any future analysis.

Response to Comment CL-VTA-5

The commenter provided contact information in case the City has questions or would like to discuss the comments provided.

The City appreciates inclusion of contact information; however, general comments providing contact information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft



EIR's coverage of physical environmental impacts. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.24 Response to Comment CL-Caltrans: Yunsheng Luo - Caltrans

Response to Comment CL-Caltrans-1

The commenter expressed their appreciation for the opportunity to provide comments and provided a summary of their responsibility to review land use projects and provided a summary of the proposed project.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-Caltrans-2

The commenter provided a summary of the VMT analysis in the Draft EIR, the identified impact levels, and requested Caltrans be updated as the potential bicycle and pedestrian bridge project across SR-17 progresses to ensure early coordination.

With respect to VMT impacts, impacts were addressed in Section 3.7, Transportation, of the Draft EIR under Impact TRANS-b on pp. 3-161 to 3-162. The commenter indicates the light rail station is 2.3 miles from the project site, which is not accurate. Additionally, see Topical Response No. 8 for response to comment related to VMT analysis. When a proposal for development of the future bicycle and pedestrian bridge across SR-17 is received by the City, applicable agencies will be contacted to ensure coordination. General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-Caltrans-3

The commenter requested any increase in storm water runoff to State Drainage Systems or Facilities from the project be treated, contained on project site, and metered to preconstruction levels and any floodplain impacts be documented and mitigated. Additionally, the commenter noted the project may impact the State Drainage System given the project site's adjacency to SR-17 and requested a hydraulic report be submitted during the design phase for Caltrans to review that addresses how the existing SR-17 drainage system would be impacted by the project, includes pre- and post-construction surface runoff flows, and discusses whether any mitigation is necessary.



The commenter outlined Caltrans requirements related to stormwater runoff to the State Drainage System and hydraulic report that Caltrans believes are applicable to the proposed project. The comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. The proposed project will be required to comply with applicable Caltrans requirements. Campbell Municipal Code Sections 14.02.030 and 20.80.020 requires the proposed project to comply with applicable National Pollutant Discharge Elimination System, grading, drainage, erosion-control, and stormwater-management requirements. Consistent with these generally applicable requirements, the Public Works conditions of approval will require a hydrology study, an engineered grading and drainage plan, a Storm Water Pollution Prevention Plan, and source-control, site-design, and treatment measures to reduce runoff quantity and improve runoff quality. These obligations notwithstanding, the proposed project's stormwater will not be discharged to a Caltrans drainage system. Public Works has confirmed that runoff will be conveyed to a City storm drain main in Union Avenue, then to Campbell Avenue, and ultimately to Los Gatos Creek. This system is separate from the Caltrans drainage system serving SR-17. Accordingly, the proposed project would not increase runoff to a State drainage system or facility, and a hydraulic report evaluating impacts to the State system is not required.

Response to Comment CL-Caltrans-4

The commenter stated should construction activities within Caltrans ROW take place, mitigation measures be implemented if there is a discovery of cultural resources including: contacting Caltrans Office of Cultural Resources Studies, a staff archaeologist evaluate the finds within one business day after contact, and Caltrans review of any potential data recovery plans within Caltrans' ROW.

The commenter outlined Caltrans requirements related to discovery of cultural resources within Caltrans ROW during construction. As outlined in Section 3.2, Cultural Resources, of the Draft EIR, the proposed project identified Mitigation Measures CUL-1 through CUL-3 which outline requirements for discovery of unknown archaeological or cultural resources during construction. The proposed project would not include any construction activities within existing Caltrans ROWs and as such, no revisions to the mitigation measures are required to include Caltrans requirements. Caltrans requirements related to discovery of cultural resources within Caltrans ROW are not applicable to the proposed project. The proposed project will be required to comply with other applicable Caltrans requirements and the comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. As such, no further response is required.

Response to Comment CL-Caltrans-5

The commenter noted project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans and noted coordination with Caltrans to develop a Transportation Management Plan may be required prior to construction to reduce construction traffic impacts.

The commenter outlined Caltrans requirements that are applicable to the proposed project. The proposed project will be required to comply with applicable Caltrans requirements. Additionally, as indicated in the Draft EIR on pp. 2-39, 3-119, 3-160, 7-220, and 7-229, for any temporary restrictions or closures required for adjacent roadways during construction, the applicant would prepare and implement a traffic control plan in accordance with City requirements. The comment does not raise specific environmental concerns



regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. As such, no further response is required.

Response to Comment CL-Caltrans-6

The commenter outlined Caltrans requirements that are applicable to the proposed project.

The proposed project would be required to comply with applicable Caltrans requirements. The comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. As such, no further response is required.

Response to Comment CL-Caltrans-7

The commenter provided contact information in case the City has questions or would like to discuss the comments provided.

The City appreciates inclusion of contact information; however, general comments providing contact information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.25 Response to Comment CL-WVCC: Atkinson, Andelson, Loya, Ruud & Romo; Kosmont Companies; Fehr & Peer (on behalf of West Valley Construction Company)

Response to Comment CL-WVCC-1

The commenter stated they represent WVCC and provide background on WVCC's operations and services.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-WVCC-2

The commenter stated the Draft EIR has the following deficiencies: incomplete environmental baseline; failure to analyze impacts to surrounding industrial environmental; transportation analysis relied on unsupported assumptions and insufficient presumptions; feasible mitigation measures and alternatives are omitted; and City failed to respond to substantial evidence presented during scoping. The commenter stated substantial revisions and recirculation is required.

Scoping meeting comments were provided in Table 1.2-1 of the Draft EIR and information provided during the scoping meeting were incorporated and considered in the analysis where applicable.



Proposed alternatives were discussed and analyzed in Section 5.0, Alternatives to the Proposed Project, of the Draft EIR. The Draft EIR analyzed two alternatives to the proposed project, as more fully described in Section 5.0, Alternatives to the Proposed Project, of the Draft EIR. The alternatives analyzed in the Draft EIR were derived and analyzed in accordance with CEQA Guidelines Section 15126.6(a). The purpose of an alternatives analysis is to provide alternatives that could lessen the identified significant impact of the proposed project. The Draft EIR did not identify any significant and unavoidable impacts. As such, the alternatives provided in the Draft EIR included an analysis of the traditional “No Project” alternative required by Section 15126 of CEQA Guidelines, and a "No Project Future Development Alternative" which analyzed the potential impacts that could result if the project site was developed in accordance with the uses envisioned in the City’s 6th Cycle Housing Element and 2040 General Plan. Additionally, mitigation measures were identified throughout the Draft EIR where potentially significant impacts were identified. See Topical Response Alternative Site Access for a discussion of potential additional alternatives.

The request for re-evaluation of the Draft EIR and recirculation is noted. Recirculation of a Draft EIR is required under CEQA Guidelines Section 15088.5 only when the lead agency adds significant new information to the Draft EIR after public notice but prior to certification of the EIR. Significant new information includes identification of a new significant impact, a substantial increase in the severity of an impact, or a feasible alternative or mitigation measure that is considerably different than those analyzed. This criteria has not been met and as such, recirculation is not required. General comments providing one’s opinion regarding adequacy of the Draft EIR does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project.

Additionally, refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site, Topical Response No. 4 for response to comment related to alternative site access, Topical Response No. 7 for a response to comment regarding the environmental setting and baseline conditions, and Topical Response No. 8 for a response to comment regarding the VMT analysis.

Response to Comment CL-WVCC-3

The commenter stated the Draft EIR fails to analyze impacts on the existing physical environment noting that: the project is located in an active industrial corridor and the Draft EIR does not analyze how introduction of residential uses would affect the functioning of the existing environment, and the Draft EIR does not evaluate how the project will affect existing industrial operations in the area including heavy truck movement, loading activity, and other operational conditions. Additionally, the commenter stated CEQA requires evaluation of environmental changes caused by a project to the existing setting and as such, analysis is incomplete. Commenter cites Communities for a Better Environment v. South Coast AQMD (2010) 48 Cal.4th 310, 328 and Kings County Farm Bureau v. City of Hanford (1990) 221 Cal.App.3d 692, 712 in support of its comments.

The Draft EIR notes the presence of commercial and light industrial uses in the vicinity of the project site in several locations including Section 1.0, Introduction, Section 3.1, Air Quality, Section 3.5, Land Use and Planning, and Section 3.6, Noise, and Appendix B of the Draft EIR. Impact AIR-c under Section 3.1,



Air Quality, of the Draft EIR identifies facilities within 1,000 feet of the project site which are identified as permitted stationary sources of emissions in the project area to determine potential health risks posed to the proposed project from nearby industrial and commercial uses. Many industrial uses, for instance, are specifically identified in Table 3.1-10 and Table 3.1-11 of the Draft EIR, including the commenter's businesses (Draft EIR p. 3-72). Impact LU-b under Section 3.5, Land Use and Planning, of the Draft EIR includes an analysis of potential conflicts that could occur with existing commercial and industrial land uses in the vicinity of the project site due to inconsistent land uses (Draft EIR pp. 3-124 to 3-126). Additionally, as identified in Section 3.6.1, Environmental Settings, of the Draft EIR, a community noise survey was conducted in February 2025 which consisted of documenting noise levels at and around the project site by taking noise measurements during daytime and nighttime hours at several locations to determine the current ambient noise levels at the site from existing nearby uses including the commercial and industrial uses in the area (Draft EIR pp. 3-132 to 3-134). Table 1.2-1 (Draft EIR pp. 1-3 to 1-13) and Appendix B to the Draft EIR also acknowledge and address information received during the NOP process that the area has industrial uses. As such, the existing non-residential operations, including industrial uses where applicable, were thoroughly considered in the Draft EIR analysis. The Draft EIR's analysis compares the conditions expected to occur with the proposed project to existing physical conditions without the proposed project and documents any foreseeable environmental impacts, consistent with *Communities for a Better Env't v. South Coast AQMD* (2010) 48 Cal.4th 310 and *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692. Additionally, see Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations and Topical Response No. 7 for response to comment related to environmental setting and baseline conditions.

Response to Comment CL-WVCC-4

The commenter stated the environmental baseline described is incomplete and misleading stating that Draft EIR description does not match the Staff Report and states the Draft EIR fails to characterize the area as an active industrial and infrastructure-support corridor with constrained circulation and operational limitations. Commenter stated: the site is part of an established employment district; vehicular access to and from the site is constrained and funneled toward McGlincy Lane, with limited connection points; secondary emergency access is required but has not been secured or designed. The commenter stated the comment letters and traffic counts submitted during scoping process show that heavy vehicle activity is present and constrained roadway conditions and operational conflicts exists. The commenter stated the Draft EIR does not incorporate or analyze the documented conditions in the baseline description and does not address heavy truck staging, constrained roadway widths, or industrial circulation patterns. Additionally, the commenter stated the Draft EIR has incomplete and misleading baseline which undermines the validity of its analysis and conclusions and renders the document legally inadequate and these same deficiencies directly undermine the Draft EIR's VMT analysis. Commenter cites Communities for a Better Environment v. South Coast Air Quality Management Dist. (2010) 48 Cal.4th 310, 315; San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App.4th 713, 729; and Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal.3d 376, 393 in support of its comments.

The Draft EIR's analysis compared the conditions anticipated to occur with the proposed project to existing, "on the ground" physical conditions without the proposed project and documents any foreseeable environmental impacts, consistent with *Communities for a Better Env't v. South Coast AQMD*



(2010) 48 Cal.4th 310 and *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713. The Draft EIR's analysis and conclusions are based on substantial evidence, in accordance with *Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376. Refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations, Topical Response No. 6 for a response to comment related to emergency access and response, Topical Response No. 7 for a response to comment regarding environmental setting and baseline conditions, and Topical Response No. 8 for a response to comment regarding the VMT analysis.

Response to Comment CL-WVCC-5

The commenter stated the Draft EIR fails to analyze the physical and operational conflicts resulting from placing dense residential development adjacent to heavy industrial operations. The commenter stated their prior submissions and attached technical materials show existing conditions include continuous truck movements, routine staging within roadway corridors, early morning and 24/7 emergency response operations, and ongoing equipment and material handling activities. The commenter stated the Draft EIR does not evaluate how the introduction of a residential population will affect these operations, nor does it assess the reciprocal effects of these operations on the proposed residential use, and the Draft EIR fails to evaluate the reasonably foreseeable indirect impacts arising if these operations are constrained by land use conflict, including the potential displacement, relocation, or modification of industrial activities. The commenter stated reasonably foreseeable indirect impacts further include increased vehicle travel, emissions, and inefficiencies associated with relocated operations, as well as degradation of emergency response capabilities and stated these impacts are analyzed in the Economic and Operational Impact Memorandum provided.

The commenter's suggestion that the Draft EIR should evaluate the effects of surrounding operations on the proposed residential use is contrary to established law. CEQA evaluates the impacts of a proposed project on the environment, not the impacts of the existing environment on the project's future users (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 386). Additionally, see Topical Response No. 3 for response to comment related to economic impacts and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-WVCC-6

The commenter stated the Draft EIR acknowledges but does not meaningfully analyze the project's reliance on a constrained and conditional access assumptions citing that: the City's staff report concludes that secondary emergency access is required but has not been secured or demonstrated; the Draft EIR does not analyze whether the EVA easement identified is legally available, physically feasible, or capable of supporting reliable emergency access under operating conditions and concludes the project would not affect response times and would not require new or expanded fire protection facilities; emergency access is contingent on compliance with City standards "subject to an AMMR" and relies in part on the EVA easement from Paseo de Palomas; the City's staff report confirms that circulation is funneled toward McGlincy Lane and that alternate routes, including Cristich Lane and Paseo de Palomas, do not provide functional access to the site. Additionally, the commenter stated the Draft EIR fails to evaluate a functional secondary access connection via Paseo de Palomas as a feasible alternative or design

modification. The commenter stated the Draft EIR fails to meaningfully evaluate emergency response times, evacuation feasibility, or system reliability under foreseeable conditions, including partial or full roadway obstruction.

Refer to Topical Response No. 4 for response to comments related to alternate site access and Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-WVCC-7

The commenter stated the deficiencies described in CL-WVCC-6 undermine the Draft EIR's alternative analysis and fails to evaluate whether alternative circulation configurations could reduce operational conflicts, improve emergency access reliability, or better respond to the site's constrained conditions. The commenter stated the Draft EIR does not provide a sufficient basis for rejecting or refining feasible alternatives involving modification or expanded use of available access points, including the Paseo de Palomas easement, which may represent the most feasible opportunity to establish a functional and reliable primary or enhanced access configuration.

Refer to Topical Response No. 4 for response to comments related to alternate site access.

Response to Comment CL-WVCC-8

The commenter stated the existing roadway conditions include frequent truck staging, constrained maneuverability, overlapping use by industrial vehicles and non-industrial users, and the absence of adequate pedestrian and bicycle infrastructure, which present existing safety constraints that would be exacerbated by the introduction of residential uses. The commenter stated these conditions are not meaningfully analyzed in the Draft EIR and noted the attached independent traffic data collected by Fehr & Peers. The commenter stated the Draft EIR does not evaluate how the introduction of residential traffic, pedestrians, and cyclists would interact with these conditions, including truck staging within travel lanes, turning movements at constrained intersections, and conflicts at site access points. Instead, it appears to rely on generalized assumptions regarding roadway safety and historical collision data.

Refer to Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety, Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations, and Topical Response No. 7 for a response to comment regarding the environmental setting and baseline conditions.

Response to Comment CL-WVCC-9

The commenter stated the Draft EIR's treatment of existing roadway conditions is undermined by its attempt to attribute documented circulation constraints to the alleged "conduct" of existing industrial users rather than to the physical and operational characteristics of the surrounding environment. The commenter references the Draft EIR's responses to scoping comments letter prepared by Hanson Bridgett LLP (included in Draft EIR Appendix B). The commenter stated the Draft EIR does not evaluate whether these existing conditions will continue, intensify, or interact with new residential uses introduced by the project. Nor does it analyze whether the project would exacerbate conflicts between necessary industrial operations and increased pedestrian, bicycle, and passenger vehicle activity.



Refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-WVCC-10

The commenter stated the Draft EIR suggests that existing operational practices should be eliminated or materially altered through future regulatory enforcement. The commenter stated the EIR must evaluate the project's impacts under reasonably foreseeable real-world conditions, not under hypothetical scenarios in which existing land uses or essential infrastructure-support activities are constrained or removed.

Refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations and Topical Response No. 7 for a response to comment regarding the environmental setting and baseline conditions.

Response to Comment CL-WVCC-11

The commenter stated the Draft EIR's VMT analysis is legally deficient and unsupported by substantial evidence and the analysis relies on a generalized transit-proximity screening presumption, not an evidence based analysis, and fails to evaluate whether that presumption is valid under the actual conditions present at the site. The commenter stated the Draft EIR cites no statutory authority establishing a conclusive presumption applicable to the project and states CEQA requires agencies to move beyond generalized thresholds where project-specific evidence calls those assumptions into question.

Refer to Topical Response No. 8 for a response to comment regarding the VMT analysis.

Response to Comment CL-WVCC-12

The commenter stated the Draft EIR's use of straight-line distance is inconsistent with CEQA's requirement that environmental analysis reflect actual physical conditions and real-world behavior. The commenter stated the site is not meaningfully accessible to transit due to: physical separation by SR-17, indirect and constrained pedestrian and bicycle routes, and lack of functional, safe connections between the site and the transit station. The commenter stated meaningful access to the rail station would likely require substantial infrastructure improvements such as the pedestrian bridge crossing over SR-17 but that the Draft EIR does not evaluate the feasibility, cost, or environmental implications of such improvements, nor does it analyze whether transit access is realistically achievable absent them. The commenter stated the Draft EIR's reliance on a transit-proximity presumption is unsupported and that a full quantitative VMT analysis is required.

Refer to Topical Response No. 8 for a response to comment regarding the VMT analysis.

Response to Comment CL-WVCC-13

The commenter stated the Draft EIR does not evaluate how future residents will travel to work and services, whether transit is a feasible alternative to driving, and whether the project's location will result in increased vehicle trips. The commenter stated the Draft EIR assumed reduced VMT based on proximity



classification and CEQA requires analysis of actual environmental effects, including how a project will influence travel patterns and behavior and as such, the Draft EIR provides no evidentiary basis for its VMT conclusion.

Refer to Topical Response No. 8 for a response to comment regarding the VMT analysis and Topical Response No. 1 for a response to comment regarding increased traffic and congestion impacts within the vicinity of the project site.

Response to Comment CL-WVCC-14

The commenter stated the Draft EIR provides no legal or analytical basis for treating plan consistency as determinative of VMT impacts and the use of the term "deemed" consistent does not establish actual environmental consistency or eliminate the need for evidence-based CEQA analysis.

Refer to Topical Response No. 8 for a response to comment regarding the VMT analysis.

Response to Comment CL-WVCC-15

The commenter stated the deficiencies in the VMT analysis are directly tied to the defective baseline and both analyses ignore actual roadway conditions, disregard physical constraints on access, and substitute simplified assumptions for real-world conditions. The commenter provided WVCC's job location data which demonstrates that employee travel and worksite activity are regionally distributed and centered around the Campbell operations hub, and noted that potential relocation sites are located significantly farther from that hub, as discussed in the economic memorandum provided.

Refer to Topical Response No. 3 for a response to comment regarding potential economic impacts to existing businesses and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations. Additionally, refer to Topical Response No. 7 for a response to comment regarding environmental setting and baseline conditions, and Topical Response No. 8 for a response to comment regarding the VMT analysis.

Response to Comment CL-WVCC-16

The commenter stated because the Draft EIR relies on a rebuttable presumption, ignores contradictory evidence, fails to analyze real-world conditions, and omits project-specific analysis, its conclusion that the project will have a less than significant VMT impact is not supported by substantial evidence.

Refer to Topical Response No. 7 for a response to comment regarding environmental setting and baseline conditions and Topical Response No. 8 for a response to comment regarding the VMT analysis.

Response to Comment CL-WVCC-17

The commenter stated the Draft EIR fails to comply with CEQA's requirement to evaluate a reasonable range of alternatives capable of avoiding or substantially lessening the project's significant environmental effects and stated the Draft EIR fails to evaluate alternatives responsive to the project site's constrained access conditions and surrounding industrial context. The commenter stated reasonable alternatives include: reconfiguration of ingress and egress points, redistribution of traffic flows, or modified internal circulation patterns designed to reduce reliance on constrained roadway segments; the use of the Paseo



de Palomas EVA easement and formally integrating, expanding, or reconfiguring it as a potential secondary access point or primary access point to reduce traffic congestion and operation conflicts and improve emergency access; and site design modifications, circulation management strategies, or access reconfiguration that respond to the surrounding industrial context.

Refer to Topical Response No. 4 for a response to comments related to alternate site access.

Response to Comment CL-WVCC-18

The commenter stated the Draft EIR fails to include enforceable mitigation measures addressing the project's significant impacts, including transportation conflicts, safety hazards, and access constraints and the transportation mitigation measures are deficient. The commenter stated the Draft EIR identifies potentially significant impacts related to circulation, roadway safety, and conflicts between transportation modes but the mitigation is limited to pedestrian improvements. The commenter stated these measures do not address the project's fundamental circulation constraints and as such, the mitigation measures are not responsive to the identified impacts and cannot support the Draft EIR's conclusion that transportation impacts would be reduced to a less than significant level. The commenter stated the Draft EIR also fails to identify mitigation measures addressing foreseeable conflicts between heavy industrial vehicle activity and new pedestrian and bicycle traffic in an area lacking adequate multimodal infrastructure.

Mitigation measures for potentially significant impacts are provided in Section 3.1, Air Quality, Section 3.2, Cultural Resources, Section 3.5, Land Use and Planning, Section 3.7, Transportation, and Section 3.8, Tribal Cultural Resources, of the Draft EIR. Additionally, mitigation measures were identified in the Initial Study (Appendix A to the Draft EIR) for Initial Study Section 3.4, Biological Resources and Initial Study Section 3.7, Geology and Soils. A summary of the mitigation measures included in the Initial Study and Draft EIR can be found in Table ES-1: Summary of Impacts and Mitigation Measures from the Initial Study and Table ES-2: Summary of Impacts and Mitigation Measures from the Draft EIR, in the Draft EIR. The mitigation measures identified in the Initial Study and Draft EIR are also included in the MMRP which include the timing of the mitigation measure, the responsible party, and the steps to be taken to implement the mitigation measures. The MMRP will be provided to the City with the Final EIR.

Potentially significant impacts related to transportation are analyzed in Section 3.7, Transportation, of the Draft EIR which found that it would result in significant impacts related to pedestrian access and circulation due to disconnected sidewalks in the area and as such, Mitigation Measure TRANS-1 was included to reduce potential impacts to a less than significant level. Mitigation Measure TRANS-1 outlines pedestrian improvements required to be constructed by the Applicant including the installation of a high visibility crosswalk across Campbell Technology Parkway, installation of ADA compliant ramps at the crosswalks, installation of a crosswalk at the East McGlincy Lane intersection, providing red curb at each project driveway to maintain sight distance for exiting vehicles, and providing a public access easement across the project streets to preserve bicycle and pedestrian access for a potential future bicycle and pedestrian bridge across SR-17 as identified in the Santa Clara Countywide Bicycle Plan. This mitigation measure is responsive to the potential impact identified for pedestrian circulation and access and would reduce the identified impact by providing improvements to allow for better pedestrian circulation and access within and around the project site. No other circulation constraints or transportation impacts were identified in the Draft EIR. An EIR is not required to mitigate impacts that are not found to be significant

(CEQA Guidelines Section 15126.4(a)(3)). As such, no other mitigation measures are required including for conflicts between the existing industrial activity and new pedestrian and bicycle traffic.

Additionally, refer to Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-WVCC-19

The commenter stated the Draft EIR references roadway widening along Campbell Technology Parkway as part of the project's offsite improvements but fails to analyze the nature or effectiveness of those improvements in addressing the project's identified transportation impacts. The commenter stated the Draft EIR does not evaluate whether the proposed widening would accommodate heavy truck turning movements, reduce queuing and blockage events, or improve emergency access conditions along this constrained corridor, nor does it assess whether such improvements would alter the project's circulation or safety impacts.

The proposed project would not widen Campbell Technology Parkway but would include improvements along the Campbell Technology Parkway frontage which include new curb and gutters, sidewalks, and accessible curb ramps at all pedestrian road crossings. Revisions have been completed to Section 2.2.10. Offsite Improvements, of the Draft EIR, to clarify the proposed improvements to Campbell Technology Parkway, which are proposed as part of the proposed project. Revisions to the Draft EIR can be found in Section 3.0, Revisions to the Draft EIR, of this Final EIR document. No "significant new information" is introduced that would warrant recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5.

Potentially significant impacts related to transportation are analyzed in Section 3.7, Transportation, of the Draft EIR which found that the proposed project would result in potentially significant impacts related to pedestrian access and circulation and as such, Mitigation Measure TRANS-1 was included to reduce potential impacts to a less than significant level. Mitigation Measure TRANS-1 outlines pedestrian improvements required to be constructed by the Applicant including the installation of a high visibility crosswalk across Campbell Technology Parkway, installation of ADA compliant ramps at the crosswalks, installation of a crosswalk at the East McGlincy Lane intersection, providing red curb at each project driveway to maintain sight distance for exiting vehicles, and providing a public access easement across the project streets to preserve bicycle and pedestrian access for a potential future bicycle and pedestrian bridge across SR-17 as identified in the Santa Clara Countywide Bicycle Plan. This mitigation measure is responsive to the potential impact identified for pedestrian circulation and access and would reduce the identified impact by providing improvements to allow for better pedestrian circulation and access within and around the project site. No other circulation constraints or transportation impacts were identified in the Draft EIR.

Response to Comment CL-WVCC-20

The commenter stated the Draft EIR is inconsistent in their treatment of potential access improvements and the Draft EIR includes a requirement to preserve an easement for a future pedestrian and bicycle bridge across SR-17, while simultaneously acknowledging in the administrative record that such a bridge



is not part of the proposed project and is not subject to environmental review. The commenter stated the Draft EIR cannot rely on speculative or uncertain future infrastructure – including assumptions regarding the Paseo de Palomas easement as a potential access connection – to support its impact conclusions while failing to analyze the feasibility, timing, or function of that access.

The SR-17 overcrossing public access easement across the project streets to preserve bicycle and pedestrian access for a potential future bicycle and pedestrian bridge across SR-17 is included in Mitigation Measure TRANS-1 in Section 3.7, Transportation, of the Draft EIR to include references to VTA's Santa Clara Countywide Bicycle Plan's proposed plans. The SR-17 overcrossing is not a component of the proposed project and was only included to indicate to VTA an acknowledgement of their future plans. The overcrossing is a separate, independent project identified in VTA's Santa Clara Countywide Bicycle Plan. The actual details of the overcrossing, such as the facility type and ROW location, will be identified and coordinated between the City and VTA when the proposed improvement is moving forward. When actual development of the overcrossing is proposed, then it would become subject to environmental review. The proposed project does not rely on the public access easement across the project streets to preserve bicycle and pedestrian access for a potential future overcrossing across SR-17 to support the impact conclusions included in the Draft EIR.

Additionally, refer to Topical Response No. 4 for a response to comments related to alternate site access and Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-WVCC-21

The commenter stated CEQA requires mitigation measures be specific, enforceable, and capable of effective implementation and the Draft EIR does not meet this standard and fails to identify specific, enforceable measures that would address the project's significant circulation and safety impacts.

Mitigation measures for potentially significant impacts are provided in Section 3.1, Air Quality, Section 3.2, Cultural Resources, Section 3.5, Land Use and Planning, Section 3.7, Transportation, and Section 3.8, Tribal Cultural Resources, of the Draft EIR. Additionally, mitigation measures were identified in the Initial Study (Appendix A to the Draft EIR) for Initial Study Section 3.4, Biological Resources and Initial Study Section 3.7, Geology and Soils. A summary of the mitigation measures included in the Initial Study and Draft EIR can be found in Table ES-1: Summary of Impacts and Mitigation Measures from the Initial Study and Table ES-2: Summary of Impacts and Mitigation Measures from the Draft EIR, in the Draft EIR. The mitigation measures identified in the Initial Study and Draft EIR are also included in the MMRP which include the timing of the mitigation measure, the responsible party, and the steps to be taken to implement the mitigation measures. The MMRP will be provided to the City with the Final EIR.

A potentially significant impacts related to transportation and safety were identified in Section 3.7, Transportation, of the Draft EIR which found that it would result in significant impacts related to pedestrian access and circulation. As such, Mitigation Measure TRANS-1 was included to reduce potential impacts. Mitigation Measure TRANS-1 outlines pedestrian improvements required to be constructed by the Applicant including the installation of a high visibility crosswalk across Campbell Technology Parkway, installation of ADA compliant ramps at the crosswalks, installation of a crosswalk at the East McGlincy Lane intersection, and providing red curb at each project driveway to maintain sight distance for exiting vehicles. The component indicating the applicant will be providing a public access easement across the

project streets to preserve bicycle and pedestrian access for a potential bicycle and pedestrian bridge across SR-17 as identified in the Santa Clara Countywide Bicycle Plan, as noted in Response to Comment CL-WVCC-20, is not in fact necessary to mitigate impacts, and the potential pedestrian impact identified in Section 3.7, Transportation, of the Draft EIR can be mitigated by the other proposed pedestrian improvements included in Mitigation Measure TRANS-1. If preservation of the public access easement across the project streets was not included in Mitigation Measure TRANS-1, the impact analysis conclusion would be unchanged, and the other measures included in Mitigation Measure TRANS-1 would adequately reduce the potentially significant impact related to pedestrian safety and circulation, Accordingly, this mitigation measure is responsive to the potential impact identified for pedestrian circulation and access and would reduce the identified impact by providing improvements to allow for better pedestrian circulation and access within and around the project site. No other circulation constraints or transportation impacts were identified in the Draft EIR. An EIR is not required to mitigate impacts that are not found to be significant. (CEQA Guidelines Section 15126.4(a)(3).)

Response to Comment CL-WVCC-22

The commenter stated the City has failed to provide reasoned, good-faith responses required under CEQA to substantive comments in the administrative record, including those submitted by WVCC and its consultants during the EIR scoping period.

Comments received during the NOP process are provided in Table 1.2-1 of the Draft EIR. The table includes a summary of the comments received and identifies the section of the Draft EIR where the comment is addressed. If the comments were determined to be related to CEQA and the proposed project, it was responded to in the Draft EIR.

Response to Comment CL-WVCC-23

The commenter stated the Draft EIR fails to analyze cumulative impacts associated with the interaction of residential development, industrial operations, and constrained transportation infrastructure.

Cumulative impacts are analyzed in Section 4.0, Cumulative Effects, of the Draft EIR. As outlined in the Draft EIR, Section 15130(a) of the CEQA Guidelines requires a discussion of the cumulative impacts of a project when the project's incremental effect is cumulatively considerable. Cumulatively considerable, as defined in CEQA Guidelines Section 15065(a)(3), means that the "incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." The CEQA Guidelines Section 15355 defines a cumulative impact as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact analysis included a list of past, current, and probable future projects identified as "related projects". The list of past, present, and probable future projects used for the cumulative analysis was restricted to those projects that have occurred or are planned to occur (i.e., pending applications at the time of the NOP release) within the vicinity of the project site. See Section 4.0, Cumulative Effects, of the Draft EIR for a discussion of potential cumulative impacts that could result from implementation of the proposed project in conjunction with related projects in the vicinity of the project site. Cumulative impacts do not require an analysis of potential impacts associated with the interaction of existing industrial operations and constrained transportation infrastructure in the area as the existing uses are included as the

environmental baseline. As the existing conditions are included in the environmental baseline utilized as the basis of the impact analysis, a cumulative impact analysis of the project's interaction with the existing conditions is not appropriate. Additionally, see Topical Response No. 5 for response to comment related to conflicts with existing industrial uses and operations, Topical Response No. 1 for response to comment related to increased traffic congestion and backup within the vicinity of the project site, and Topical Response No. 2 for response to comment related to pedestrian and bicycle safety.

Response to Comment CL-WVCC-24

The commenter stated recirculation of the Draft EIR is required as the Draft EIR relies on incorrect assumptions, fails to analyze key impact pathways including emergency access, industrial compatibility, and project-specific VMT impacts, fails to adopt effective mitigation measures for acknowledged transportation and safety impacts, and fails to evaluate feasible access alternatives.

The request for re-evaluation of the Draft EIR and recirculation is noted. Recirculation of a Draft EIR is required under CEQA Guidelines Section 15088.5 only when the lead agency adds significant new information to the Draft EIR after public notice but prior to certification of the EIR. Significant new information includes identification of a new significant impact, a substantial increase in the severity of an impact, or a feasible alternative or mitigation measure that is considerably different than those analyzed. This criteria has not been met and as such, recirculation is not required. General comments providing one’s opinion regarding adequacy of the Draft EIR does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. As such, no further response is required.

Response to Comment CL-WVCC-25

The commenter expressed their reservation of rights including the right to supplement these comments, submit additional evidence, and challenge any certification of the EIR or approval of the project and noted that deficiencies identified in their letter raise serious concerns regarding compliance with CEQA and may require further legal review.

General comments providing information does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Additionally, the Draft EIR was prepared in compliance with CEQA Guidelines. As such, no further response is required.

Response to Comment CL-WVCC-26

The commenter provided their conclusion statement stating the Draft EIR fails to provide the substantial evidence-based analysis required under CEQA; relies on presumptions rather than facts, including the improper substitution of rebuttable screening thresholds for project specific VMT analysis; relies on incomplete descriptions of the existing environment rather than the full disclosure required under CEQA. As such the commenter requested revision and recirculation of the Draft EIR.



The request for recirculation of the Draft EIR. Recirculation of a Draft EIR is required under CEQA Guidelines Section 15088.5 only when the lead agency adds significant new information to the Draft EIR after public notice but prior to certification of the EIR. Significant new information includes identification of a new significant impact, a substantial increase in the severity of an impact, or a feasible alternative or mitigation measure that is considerably different than those analyzed. This criteria has not been met and as such, recirculation is not required. General comments providing one's opinion regarding adequacy of the Draft EIR does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. However, these comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Additionally, the Draft EIR was prepared in compliance with CEQA Guidelines. As such, no further response is required. Also see Topical Response No. 5 for response to comment related to conflicts with existing industrial uses and operations, Topical Response No. 7 for response to comment related to environment setting and baseline conditions, and Topical Response No. 8 for response to comment related to the VMT analysis.

Response to Comment CL-WVCC-27

The commenter provided their own independent traffic counts and a summary of the results prepared by Fehr & Peers to support their comment letter.

Traffic counts provided in the transportation analysis (Appendix G to the Draft EIR) was taken on Tuesday, January 9, 2024, during AM peak and PM peak hours at the Campbell Technology Parkway and East McGlincy Lane intersection, on Wednesday November 8, 2023, during AM peak hours at the Curtner Avenue and Camden Avenue intersection, and on September 1, 2022, during PM peak hours at the Curtner Avenue and San Thomas Expressway intersection.

The transportation analysis included existing traffic counts along McGlincy Lane, which indicated average daily traffic volumes of approximately 1,800 vehicles. The traffic counts referenced by the commenter indicate average daily volumes ranging from approximately 1,570 to 1,750 vehicles. These volumes are generally consistent and reflect similar existing traffic conditions. The traffic count data is provided for informational purposes to characterize existing conditions and does not affect the project's CEQA transportation conclusions, which are based on VMT in accordance with SB 743 and Section 15064.3 of the CEQA Guidelines. Additionally, see Topical Response No. 5 for response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-WVCC-28

The commenter provided a memorandum prepared by Kosmont Companies who provided an analysis of economic impacts related to the project. The following set of comments (CL-WVCC-28 through CL-WVCC-48) are included in the Kosmont memorandum.

The commenter provided a background of Kosmont Companies and its services and experience.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision



to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-WVCC-29

The commenter stated the analysis provided is intended to identify indirect physical environmental effects under CEQA and states introduction of sensitive residential receptors adjacent to established industrial and construction-service operations may constrain industrial activities, resulting in operational degradation, reduced service capacity, displacement pressures, altered logistics patterns, and downstream environmental effects, which in turn may cause reasonably foreseeable indirect physical environmental impacts under CEQA, including increased VMT, emissions, congestion, and inability to provide emergency responses to the City of Campbell and surrounding regions. The commenter stated the proposed project will result in changes in vehicle, bicycle and pedestrian traffic and noise impacts as compared to the prior office use as impacts would no longer be limited to typical weekday work hours and now would be 24/7.

Refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-WVCC-30

The commenter stated though the project's reliance on Builders Remedy limits the scope of issues the City can consider as a basis for denying or condition the project, the city can impose conditions on the project if the city has evidence the project could result in specific impacts. The commenter stated there is evidence the project has significant potential fire/life safety impacts as no secondary roadway analysis nor comprehensive evacuation plan has been studies and recommended the lead agency require a comprehensive secondary roadway access analysis and a detailed evacuation plan, including evaluation of the feasibility, design, and functionality of a secondary ingress/egress connection via the existing easement at Paseo de Palomas to determine whether the project can be served safely, maintain acceptable emergency response times, and avoid impairing existing circulation and emergency service functions.

A comprehensive evacuation plan and secondary roadway study are not required as secondary EVA access to the site has been secured through an existing easement on Paseo de Palomas and the fire department has reviewed and approved the EVA access to the site. As outlined in Section 3.7, Transportation, of the Draft EIR under Impact TRANS-d, the proposed project would not result in impacts related to emergency access. Additionally, as identified in Section 7.0, Effects Found Not to be Significant, in the Draft EIR and Initial Study Section 3.9, Hazards and Hazardous Materials, the proposed project would not modify any existing roadways in such a way that would impede emergency access or evacuation. Additionally, as part of the design review requirements, the proposed project design would be reviewed by the City’s Fire and Police departments prior to approval to ensure that the proposed project has adequate ingress and egress, setbacks, clearances, turning radii, etc.; and does not impede emergency access. As such, impacts related to emergency access and evacuation were determined to be less than significant. The preparation of a comprehensive evacuation plan and secondary roadway study are not required.



Otherwise, the commenter correctly states the legal standard. Under the Housing Accountability Act, Government Code Section 65589.5(d)(2), a local agency may not disapprove a Builder's Remedy Project unless it makes written findings, supported by a preponderance of the evidence in the record, that the project would have a "specific, adverse impact upon the public health or safety" and there is no feasible method to satisfactorily mitigate or avoid the impact other than disapproval. The statute defines "specific, adverse impact" as "a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (Gov. Code Section 65589.5(d)(2)). Consistent with the response provided above, the Draft EIR does not identify any significant, unavoidable transportation or emergency access impacts as shown in Section 3.7, Transportation, of the Draft EIR. Additionally, see Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-WVCC-31

The commenter provided operational context and existing conditions including information regarding WVCC and the services it provides, the location of their operations and services, and employment and operation history.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-WVCC-32

The commenter stated due to the narrow configuration of East and South McGlincy Lane, the prevalence of on-street parking by large vehicles, and the substantial width and turning requirements of WVCC's commercial fleet vehicles, the introduction of significant new residential vehicular, pedestrian, bicyclist, and e-bike activity associated with the proposed residential development would create foreseeable circulation conflicts, increased vehicle conflicts, queuing, delay, and substantial safety hazards for both roadway users and WVCC personnel operating heavy vehicles. The commenter stated these operational characteristics are locationally dependent and cannot be replicated without adversely affecting travel distances, response times, and related environmental outcomes.

Refer to Topical Response No. 3 for a response to comment regarding potential economic impacts to existing businesses and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-WVCC-33

The commenter provided a figure illustrating WVCC's operational footprint and service area, and states substantial evidence is provided that industrial uses are forced out of business as cities impose strict operating standards in response to resident opposition.



Refer to Topical Response No. 2 for response to comment related to pedestrian and bicycle safety, Topical Response No. 3 for a response to comment regarding potential economic impacts to existing businesses, Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations, and Topical Response No. 7 for response to comment related to environmental setting and baseline conditions.

Response to Comment CL-WVCC-34

The commenter provided an overview of existing conditions at the project site and neighborhood stating the area contains dozens of long-established industrial and construction-related businesses that rely upon the existing roadway network to accommodate daily truck circulation, employee access, equipment deliveries, and dispatch operations, and these conditions define the existing operation environmental which project related impacts must be evaluated, including compatibility of adjacent land uses and functional performance of the roadway network. The commenter provides a figure that outlines the relationship between the project site, surrounding industrial operations, and the ingress and egress patterns associated with WVCC and nearby industrial operations.

Refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations and Topical Response No. 7 for a response to comment regarding the environmental setting and baseline conditions.

Response to Comment CL-WVCC-35

The commenter stated the introduction of high density residential uses into an established industrial corridor may create land use incompatibility and circulation conflicts that constrain WVCC's operations and could reduce WVCC's ability to provide efficient regional service, impair WVCC's emergency response capabilities, and increase pressure for industrial displacement or relocation. Additionally, the commenter states operational changes could result in foreseeable indirect physical environmental impacts under CEQA, including increased VMT, longer truck haul routes, increased diesel emissions and criteria air pollutants, additional idling and congestion, and less efficient regional goods movement and infrastructure service patterns.

Refer to Topical Response No. 3 for a response to comment regarding potential economic impacts to existing businesses, Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations, Topical Response No. 7 for a response to comment regarding the environmental setting and baseline conditions, and Topical Response No. 8 for a response to comment related to the VMT analysis.

Response to Comment CL-WVCC-36

The commenter stated the surrounding area lacks neighborhood serving commercial amenities, schools, and dining with a one mile radius and as such, would result in future residents generating substantial daily vehicle, pedestrian, bicycle, and e-bike trips. New circulation patterns would be introduced to an existing industrial environment that was not originally designed to accommodate high pedestrian and bicycle activity and the commenter stated the area lacks dedicated bicycle infrastructure and would create new roadway safety concerns.

Refer to Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety.

Response to Comment CL-WVCC-37

The commenter stated the traffic counts prepared by Fehr & Peers on behalf of WVCC show that the roadway functions as a heavily utilized industrial corridor serving the WVCC site, with a pronounced presence of truck traffic integral to its operations. As a result, the project would place residential uses in direct proximity to a truck-intensive environment and the shared roadway network would likely increase interactions between passenger vehicles, bicycles, pedestrians, and heavy trucks, raising safety and compatibility concerns while also creating pressure to restrict truck movements. The commenter stated environmental impact is not solely a function of total trip volume, but of trip type, timing, routing efficiency, and interaction with constrained industrial circulation conditions. This, in turn, could constrain access and operational flexibility for WVCC, impairing its ability to efficiently use the site and maintain its existing industrial functions.

Refer to Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety, Topical Response No. 3 for a response to comment regarding potential economic impacts to existing businesses and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations. Additionally, see Topical Response No. 7 for a response to comment regarding the environmental setting and baseline conditions.

Response to Comment CL-WVCC-38

The commenter provided information regarding the areas that WVCC serves and the commenter states WVCC's operational efficiency are related to the facility's geographic location and would be affected by displacement or relocation. The commenter stated the facility's existing infrastructure, including onsite underground fuel storage tanks and emergency fueling systems, highlight the operational necessity of the current use and should relocation be required, it would result in environmental implications such as remediation requirements. The commenter stated displacement of the existing operations would impose economic and operational burdens, with associated environmental consequences and that existing high levels of truck activity and constrained roadway conditions in the project vicinity underscores the sensitivity of current industrial operations to access and circulation disruptions.

Refer to Topical Response No. 3 for a response to comment regarding potential economic impacts to existing businesses and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-WVCC-39

The commenter stated WVCC worked with local commercial real estate brokers to do a search to identify potentially alternative locations that could accommodate their operations and the search revealed that available sites are limited, would be costly to entitle and build new facilities, industrial resale value of the existing site would be minimal due to residential conflicts, and redevelopment of the site with residential would be difficult due to existing underground fuel tanks at the site. Additionally, the commenter stated relocation would result in increased VMT due to increased driving distance for service calls and increased commute lengths for existing employees.



Refer to Topical Response No. 3 for a response to comment regarding potential economic impacts to existing businesses and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-WVCC-40

The commenter stated the following categories of foreseeable impacts warrant further evaluation: construction period truck ingress and egress and construction worker employee parking will interfere with WVCC operations; initial housing occupant's vehicle, pedestrian and bicycle/e-bike ingress and egress on Campbell Technology Parkway will likely result in accidents with WVCC and other industrial user vehicles along McGlincy Lane; in the event of natural or manmade disaster in the area, there are inadequate evacuation routes for the estimated 1,000 residents; inevitable public nuisance complaints will result in limitations on operating hours and noise abatement. The commenter stated because of contractual obligations / necessary response times, WVCC may be forced to relocate many of its operations facilities outside the City, increasing VMT and GHG/Diesel emissions from longer truck trips and employee commutes.

The commenter states construction period truck ingress and egress and construction worker parking will interfere with existing industrial operations in the area. As outlined in the Draft EIR, the proposed project's construction activities would be completed in compliance with applicable City requirements for construction staging, hours, and development standards. Though construction activities would increase the number of workers and activity in the area, the construction activities would be replacing the recently occupied R&D professional office tenants at the site. As identified under Methodology of Analysis under Section 3.7.3, Environmental Impacts, of the Draft EIR, though the existing R&D campus at the project site is currently vacated, the Applicant noted the R&D campus has historically been near capacity. The Applicant noted the campus is currently vacant as in the event the City approves the proposed project, the Applicant did not want leases to encumber the Applicant's ability to development the proposed project. The campus was partially occupied at the time the traffic analysis was conducted and at partial occupancy, the R&D campus generated approximately 889 total daily trips. As noted in Section 2.2., Construction Equipment and Workers, construction is expected to require approximately 100 workers during the peak construction stage. The 100 construction workers during the peak construction stage would generate less total daily trips than the R&D campus at partial and full capacity. As construction activities for the proposed project would be required to comply with applicable city requirements, regulations, and laws, construction activities are not anticipated to interfere with existing industrial operations. Additionally, refer to Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety, Topical Response No. 3 for a response to comment regarding potential economic impacts to existing businesses and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations. Also see Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-WVCC-41

The commenter stated the project would introduce residential uses into an area that has been use for office/research & development/industrial purposes since it was developed approximately 50 years ago and the proposed residential use is contrary to the original zoning and general plan designation for the area. The commenter stated even if the project is permissible by law, it does not mean that it is safe to



allow inconsistent land uses to exist in close proximity to one another accessed on a single two land road and while the City maybe legally required to approve the project, it can still require that the project proponents obtain other means of entry to the project site rather than solely by Campbell Technology Parkway.

As identified in Section 3.5, Land Use and Planning, of the Draft EIR, under the adopted 6th Cycle Housing Element and 2040 General Plan, three of the project site parcels were redesignated as HD MU which generally consists of residential uses as provided for by the High Density Residential land use designation and commercial uses as provided for by the General Commercial land use designation. As such, the project site is designated for high density residential uses by the City. The commenter's assertion that the proposed residential use is contrary to the original zoning and general plan designation for the area is based on a land use plan that was proposed by the City over 25 years ago in the 2001 General Plan. The City's anticipated growth and land uses have changed drastically over the last 25 years due to market conditions and changes over time and as such, the most recent iteration of the City's General Plan and Housing Element identified the project site for residential uses. Additionally, the commenter states the project would introduce residential uses in an area that has been used for office, R&D, and industrial purposes since it was developed 50 years ago. However, residential uses has existed in the project area for over 50 years and residential uses has existed in the area prior to the area being developed with office, R&D, and industrial purposes. As such, the proposed project does not propose inconsistent land uses with the area. Additionally, see Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety, Topical Response No. 4 for a response to comments related to alternate site access, and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-WVCC-42

The commenter stated an analysis of the effects on public health and safety resulting from the project should address traffic and pedestrian safety and air quality for the new residents, who will be living in an industrial area. The commenter cited articles that indicate increased e-bike sales in recent years and states the increasing prevalence of e-bikes and similar mobility devices has introduced new safety considerations, particularly in constrained industrial roadway environments lacking dedicated pedestrian or bicycle infrastructure.

Public health and safety impacts related to traffic and pedestrian safety and air quality for new residents are provided in Section 3.1, Air Quality, Section 3.4, Greenhouse Gas Emissions, and Section 3.7, Transportation of the Draft EIR. The commenter states the increased prevalence of e-bikes has introduced new safety considerations. All potential modes of transportation including walking, bicycling, and driving are analyzed in the Draft EIR and as such, the potential safety impacts related to different modes of transportation are included in the existing analysis. Under state law, e-bikes that meet state regulations are considered bicycles and the Draft EIR addresses conformance with the City's Pedestrian and Bicycle Plans as well as safety impacts for bicycles. Additionally, the City has adopted standards for public roadways that encompass all allowable uses including e-bikes and the proposed project complies with all City standards. As such, the use of e-bikes are not anticipated to result in impacts not already identified in the Draft EIR. There are no specific requirements included in the CEQA Guidelines related to increased use of e-bikes. Finally, e-bikes have been available on the market for many decades, though sales have increased significantly in recent years, with particular surges in sales during the pandemic.

Throughout this period, available data shows accidents in the project's vicinity have not increased, and there is no evidence of a causal connection between increased use of e-bikes and accidents on nearby streets. Additionally, see Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety.

Response to Comment CL-WVCC-43

The commenter stated mitigations should be studied such as redirecting ingress and egress (except in case of emergency) away from Campbell Technology Parkway and restricting parking on Campbell Technology Parkway and on East and South McGlincy.

As outlined in Section 2.2.8, Parking, of the Draft EIR, the proposed project would provide a total of 718 parking spaces onsite to accommodate the proposed residential development and would provide more parking spaces than required per Campbell Municipal Code Section 21.28.040. Of the total 718 parking spaces, 580 parking spaces would be provided as residential in-garage spaces and 138 spaces would be guest parking spaces dispersed throughout the site. As such, the project residents and any visitors would be anticipated to park within the project site and would not utilize street parking available along nearby roadways. The comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088. Additionally, see Topical Response No. 4 for a response to comments related to alternate site access.

Response to Comment CL-WVCC-44

The commenter cited California Penal Code 372 which provides local jurisdictions with authority to regulate conditions or activities that affect community health, safety, or welfare, including noise, traffic, dust, odors, and similar operational impacts. The commenter stated California law requires property owners to maintain their operations in a manner that does not create nuisance conditions; however, where surrounding land uses change, activities that were previously lawful and appropriate for an industrial area may become subject to increased scrutiny. The commenter stated introduction of residential uses into established industrial areas would increase the potential for complaints and regulatory responses would be reasonably foreseeable such as constraining industrial operations, reducing operational flexibility, and contributing to relocation pressures. These operational changes would in turn result in indirect physical environmental impacts.

Refer to Topical Response No. 3 for a response to comment regarding potential economic impacts to existing businesses and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-WVCC-45

The commenter provided examples of case studies and information related to benefits of suburban industrial areas and residential and industrial adjacency conflicts.



General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment CL-WVCC-46

The commenter provided recommendations for additional evaluations related to alternatives and mitigation measures including: additional access improvements or circulation alternatives; alternative access configurations where the project does not rely on Campbell Technology Parkway as primary access point; legal availability, design feasibility, and operational performance of utilizing Paseo de Palomas as primary access point; introduction of a second functional access point or multi-access configuration (Paseo de Palomas as primary access and Cristich Lane as supplemental access); and evaluation of potential infrastructure improvements to enhance connectivity, including a potential crossing of SR-17.

Refer to Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety and Topical Response No. 4 for a response to comments related to alternate site access.

Response to Comment CL-WVCC-47

The commenter stated additional mitigation measures should be evaluated including: industrial adjacency disclosures consistent with Proposition 65 and California Air Resources Board guidance for residential development near industrial operations; use of recorded disclosures, easements, or covenants, conditions, and restrictions (CC&Rs) to provide notice of adjacent industrial operations and establish procedures for addressing compatibility concerns prior to initiation of nuisance complaints or enforcement actions; installation of visible signage at project entrances advising residents of adjacent active industrial operations; parking and circulation restrictions designed to preserve truck maneuverability along Campbell Technology Parkway and East/South McGlincy Lane; and restrictions or limitations on e-bike operations within constrained industrial roadway segments lacking adequate bicycle infrastructure.

The CEQA Guidelines defines a "mitigation measure" as a measure designed to minimize a project's significant environmental impacts. CEQA Guidelines § 15370 outlines that the purpose of the mitigation measure is to describe any feasible measures that could avoid the impact all together, minimize impacts by limiting the magnitude of the impact, rectify the impact by repairing, rehabilitating, or restoring the impacted environment, reduce or eliminate the impact over time by preservation and maintenance operations during the life of the life of the action, or compensate for significant adverse impacts by replacing or providing substitute resources or environments. Mitigation measures are not required for environmental impacts that are found to be less than significant. As identified in the Draft EIR and outlined in Table ES-2: Summary of Impacts and Mitigation Measures from the Draft EIR, the Draft EIR included mitigation measures for all potentially significant impacts identified in the Draft EIR analysis including for air quality, cultural and tribal cultural resources, land use and planning, and transportation. Mitigation measures included in the Draft EIR were determined to reduce all potentially significant impacts to a less than significant level. As such, no further mitigation is required. As required by CEQA



Guidelines, mitigation measures are only identified for impacts that could result in a significant impact. Additional measures recommended by the commenter are noted; however, they would not be included as mitigation measures in the Draft EIR as there are no potentially significant impacts that would be required to be reduced through the recommended measures. The City stated they are considering application of these recommendations as potential conditions of approvals to the proposed project.

Response to Comment CL-WVCC-48

The commenter stated WVCC recognizes the City's obligation to accommodate additional housing opportunities. However, the introduction of a high-density residential development within a constrained industrial area presents substantial land use compatibility and public safety concerns. The commenter requested the project incorporate appropriate analysis, infrastructure improvements, and mitigation measures necessary to allow existing industrial businesses be able to continue operations without interference; mitigate transportation, safety, operational and environmental impacts; minimize potential future nuisance conflicts; and maintain safe circulation conditions for industrial and residential roadway users.

Refer to Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety, Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations, and Topical Response No. 7 for a response to comment related to environmental setting and baseline conditions.

Response to Comment CL-WVCC-49

The commenter provided a memorandum prepared by Fehr & Peers who provided an analysis of transportation section of the Draft EIR. The following set of comments (CL-WVCC-49 through CL-WVCC-58) are included in the Fehr & Peers memorandum.

The commenter (Fehr & Peers) stated the Draft EIR and associated TA does not adequately acknowledge or provide appropriate mitigation to address concerns related to high level trucking activity, bike/pedestrian circulation, or safety and urges the City to address these topics in the final EIR.

Refer to Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety and Topical Response No. 7 for a response to comment regarding the environmental setting and baseline conditions.

Response to Comment CL-WVCC-50

The commenter stated the VTA VMT Tool is only intended as an initial screening check and a screening result is only the starting point and it does not, by itself, determine the project's VMT impact or exemption. The commenter states the project's transit proximity VMT exemption does not apply as while a light rail station is within 0.5-mile as measured straight-line, the effective walking distance is approximately 1.5 miles. Because the project is not located within a reasonable walking distance to transit, the Draft EIR cannot rely on a screening-level conclusion and fails to provide the project-specific VMT analysis CEQA requires. The commenter also cited VTA's Transportation Analysis Guidelines (2025) and Governor's Office of Planning Research/Governor's Office of Land Use and Climate Innovation guidance to support that the Draft EIR cannot rely on the exemption. The commenter stated as the project is not located within



a reasonable walking distance to transit, there is a possibility it would result in VMT impacts that must be mitigated.

Refer to Topical Response No. 8 for a response to comment regarding the VMT analysis.

Response to Comment CL-WVCC-51

The commenter stated the Draft EIR's attached TA collected vehicle classification data, but it did not include a full breakdown of truck classifications that are present in the area. The commenter states the TA's statement that trucks only make up 5 to 6 percent of vehicle traffic assumes only trailer trucks and single unit trucks as trucks operate on McGlincy Lane. Additionally, the commenter states the language is vague and does not specify the truck types that are included in those two categories. The commenter stated Fehr & Peers conducted traffic counts and vehicle classifications that found that 26-33 percent of the vehicles on McGlincy Lane were Class 3-4 vehicles and 2-3 percent of the vehicles on McGlincy were Class 5-13 vehicles and as such, recommended a full classification breakdown of the vehicle activity. The commenter states the implications of existing truck activity were not adequately addressed, resulting in an inadequate baseline for evaluating project impacts.

The transportation analysis included vehicle classification data based on standard FHWA classification methods. The project counts identified approximately 21 percent Class 3–4 vehicles and approximately 5–6 percent Class 5–13 vehicles. By comparison, the independently conducted counts referenced by the commenter identified approximately 18 percent Class 3–5 vehicles and approximately 2 percent Class 5–13 vehicles. Overall, the datasets are generally consistent in magnitude and distribution. Class 3 and Class 4 vehicles are typically categorized as light-duty and medium-duty vehicles (e.g., vans, pickups, and small commercial vehicles), rather than heavy trucks. Heavy truck classifications for transportation studies generally correspond to FHWA Class 5–13 vehicles, which include single-unit trucks and combination tractor-trailers. Under CEQA, vehicle classification detail is provided for informational purposes to describe existing traffic composition and does not constitute a standalone impact metric under SB 743, which focuses on VMT rather than traffic composition. Therefore, variations in the level of vehicle classification detail do not affect the transportation analysis conclusions. The project's VMT-based evaluation and overall transportation findings remain unchanged.

Additionally, see Topical Response No. 7 for a response to comment regarding the environmental setting and baseline conditions.

Response to Comment CL-WVCC-52

The commenter stated the TA's collision data did not accurately report the total number of collisions on Campbell Technology Parkway and East McGlincy Street and data from a source different than what was utilized in the TA identified more collisions along the same routes. The commenter states by understating existing collision conditions, the Draft EIR fails to disclose existing safety risks and does not provide a sufficient basis for evaluating the project's impacts on pedestrian and bicycle safety and the final EIR should clarify and resolve the discrepancy between the TA and TIMS/SWITRS collision records, disclose all reported collisions within the study area, and identify roadway treatments to improve transportation safety.

The comment is correct in that the SWITRS report shows five collisions in the area for the years 2019 to 2024. Four collisions resulted in visible injuries, while one resulted in a complaint of pain injury. No fatal or severe injury collisions were reported. The most common primary collision factors were unsafe speed (four collisions), improper turning (one collision). Two collisions involved a pedestrian and two collisions involved a motorcyclist. No collisions involved bicyclists. The collision analysis has been corrected to reflect five reported collisions based on SWITRS data for the years 2019 to 2024. This correction does not change the conclusions of the transportation analysis or the CEQA determination. The five accidents equate to one accident per year on a roadway segment that is almost two-thirds of a mile long. The California MUTCD indicates a roadway might be unsafe, and warrant further study, where there is a minimum of four accidents within a one-year period that involve angle or pedestrian crashes (California MUTCD, Part 4 – Highway Traffic Signals, Chapter 4C, Caltrans, Sacramento, CA, January 18, 2026, pp. 1053-1054, 1074). Accordingly, the data presented by the commenter does not affect the Draft EIR's significance conclusions regarding traffic safety. No "significant new information" is introduced that would warrant recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Additionally, see Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety.

Response to Comment CL-WVCC-53

The commenter stated the project would introduce greater level of varied types of active transportation in the area and the lack of bike and pedestrian facilities, along with high level of truck traffic, necessitates an evaluation of the bike and pedestrian circulation in the area to address access and safety concerns not included in the Draft EIR. The commenter stated the Draft EIR proposes mitigation to address pedestrian infrastructure gaps along Campbell Technology Parkway, but it does not address how pedestrians or cyclists will safely walk or bike from the project to any nearby location. The commenter notes that there are no bicycle or pedestrian facilities along McGlincy Lane to the west of Campbell Technology Parkway and the Draft EIR does not properly address potential impacts to pedestrian or bicycle travel and safety on this portion of McGlincy Lane. The commenter stated at a minimum the project should mitigate potential impacts by constructing a continuous pedestrian facility along the full extent of McGlincy Lane. The commenter stated the Draft EIR fails to evaluate foreseeable conflicts between heavy vehicle operations and new non-motorized uses.

Refer to Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety and Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations.

Response to Comment CL-WVCC-54

The commenter stated the TA's report of traffic accidents and daily pedestrian and bicycle trips may understate actual levels of activity and the final EIR should properly report expected levels of pedestrian and bicycle activity and should evaluate whether the existing transportation network can safely accommodate the increase in pedestrian and bicycle activity generated by the project.

The pedestrian and bicycle trip estimates utilized in the Draft EIR, including Section 3.7, Transportation, and Appendix G, use standard ITE trip generation methodology, which is the accepted industry practice. Fehr & Peers' assertion that the estimates "may understate actual levels" is unsupported by project-specific data. General references to "recent household level travel surveys" do not constitute substantial



evidence that the TA's project-specific estimates are inaccurate. Additionally, see Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety and Topical Response No. 7 for a response to comment regarding the environmental setting and baseline conditions.

Response to Comment CL-WVCC-55

The commenter stated the project identifies the need for an alignment to be proposed for the bicycle and pedestrian overcrossing and as part of the Final EIR, the project site plan must be updated to show the specific alignment of the overcrossing route through the project site, along with the proposed facility type and ROW.

The SR-17 overcrossing public access easement across the project streets to preserve bicycle and pedestrian access for a future bicycle and pedestrian bridge across SR-17 is included in Mitigation Measure TRANS-1 in Section 3.7, Transportation, of the Draft EIR to include references to VTA's Santa Clara Countywide Bicycle Plan's proposed plans. The SR-17 overcrossing is not a component of the proposed project and was only included to indicate to VTA an acknowledgement of their future plans. The overcrossing is a separate, independent project identified in VTA's Santa Clara Countywide Bicycle Plan. The actual details of the overcrossing, such as the facility type and ROW location, will be identified and coordinated between the City and VTA when the proposed improvement is moving forward. The Draft EIR's analysis does not rely on or assume operation of the SR-17 overcrossing; this improvement is currently conceptual, and its implementation is not reasonably foreseeable. Nor does the Draft EIR rely on the public access easement across the project streets to preserve bicycle and pedestrian access for a potential future bicycle and pedestrian bridge to support the impact conclusions in the Draft EIR.

Response to Comment CL-WVCC-56

The commenter stated the EIR notes of the EVA easement along Paseo de Palomas but does not indicate how the access easement would operate with the project and if private automobiles would be able to use the EVA during an evacuation scenario. The commenter stated because of the project's proximity of existing industrial uses, including facilities with toxic chemicals and other dangerous uses, the potential need to quickly evacuate the project site is elevated and as a result, the project must fully consider emergency evacuation needs under different types of evacuation scenarios and for different types of evacuation modes, including walking and biking. The commenter stated the access easement should be open to bicycle and pedestrian travel at all hours and should be used as a second full time vehicle access point. The commenter stated the Draft EIR fails to analyze how emergency access would function under actual operating conditions, including evacuation scenarios and interaction with existing industrial uses.

Emergency access and evacuation are analyzed in Section 3.7, Transportation, and Section 7.0, Effects Found Not to be Significant, in the Draft EIR. Additional analysis is also included in Section 3.9, Hazards and Hazardous Materials, of the Initial Study (provided as Appendix A to the Draft EIR). As identified in the Draft EIR and Initial Study, the proposed project would not impair implementation of interfere with an adopted emergency response plan or evacuation plan and would not result in inadequate emergency access. The EVA would be available for use during emergency scenarios such as an evacuation scenario. The commenter's suggestion to provide the Paseo de Palomas access easement as a full time vehicle access point has been considered. Paseo de Palomas is a private street and is therefore not



available to provide public access to the project. Nor does the project require two ingress and egress points for residents. As outlined in the Draft EIR and the administrative record of proceedings, including project application completeness documents, the proposed project's circulation system complies with all County Fire District and California Fire Code requirements. As noted under Impact TRANS-d in the Draft EIR on p. 3-164, onsite circulation would be “constructed in accordance with City standards for fire and emergency access and to allow for emergency vehicle egress/ingress, subject to an AMMR approved by the SCCFD.”

The commenter states the project site is located in close proximity to facilities with toxic chemicals and other dangerous uses which increases the potential need to quickly evacuate the project site. A review of California Environment Protection Agency’s (CalEPA) Regulated Sites Portal identified that there are uses in the vicinity of the project site that are identified as Chemical Storage Facilities. However, a review of the types of chemicals utilized at these facilities in the vicinity of the project site determined that chemicals utilized are those commonly utilized at uses such as automotive repair and light industrial uses and there are no chemical utilized that are out of the ordinary and pose a significant threat to the public that could cause an evacuation scenario.

CalEPA’s Regulated Sites Portal identified one undergrounds storage tank (UST) within 0.5-mile of the site, located at 580 McGlincy Lane. Though USTs present an explosion and fire hazard, USTs are heavily regulated to prevent any potential accident scenarios. Under existing regulations, UST owners must utilize leak detection systems, corrosion protection, and spill prevention equipment to mitigate risks. All federally regulated USTs must be registered with the appropriate regulatory authority, meet leak detection requirements, and meet spill, overfill, and corrosion protection requirements. In addition, owners and operators must perform a site check and corrective action in response to leaks, spills and overfills, follow regulatory rules during installation of new tanks and closure of existing tanks, have periodic checks performed on corrosion protection and leak detection systems.

Additionally, all industrial uses in the vicinity of the project are anticipated to currently operate in compliance with existing regulations and laws related to onsite storage and use of hazardous materials, and the potential for a scenario where nearby residents are required to evacuate to occur are low. Under existing CalEPA regulations, facilities that use and store hazardous materials onsite are required to implement a Hazardous Materials Business Plan (HMBP). A HMBP is a regulatory requirement for businesses handling threshold quantities of hazardous materials. An HMBP is required to include procedures for spill containment, evacuation and annual employee safety training which reduce the potential for accidental leaks or spills to affect nearby areas. With compliance with existing regulations and laws related to storage and handling of hazardous materials onsite, the nearby industrial uses that store and use toxic chemicals are not anticipated to result in a safety hazard to nearby residents. The potential for a scenario where evacuation would be required due to an accident at nearby facilities that use toxic chemicals is extremely low. Additionally, see Topical Response No. 6 for a response to comment related to emergency access and response.

Response to Comment CL-WVCC-57

The commenter stated the project would result in additional vehicle trips at the Union Avenue/Bascom Avenue intersection and because it is a designated Congestion Management Program intersection, it should be evaluated in the EIR. The commenter stated the Draft EIR does not evaluate whether the



project's additional trips at this intersection would affect traffic operations, level of service, or regional performance standards associated with CMP facilities and without this analysis, the Draft EIR fails to disclose whether project generated traffic would result in measurable changes to circulation conditions at a regionally significant intersection. The commenter stated as a result, the transportation analysis is incomplete and does not provide sufficient information to assess the project's impacts on the surrounding roadway network.

Compliance with Congestion Management Program (CMP) requirements for the study area is administered pursuant to the VTA's CMP and is separate from the determination of transportation impacts under CEQA. The CMP is a regional transportation planning and monitoring program that establishes procedures for maintaining eligibility for certain transportation funding and for monitoring the performance of the regional roadway network. While CMP-related analyses may be required as part of the City's separate compliance with regional transportation planning requirements, they are not environmental impact analyses required under CEQA and do not constitute a basis for determining the significance of transportation impacts in the EIR. Therefore, the absence of a CMP intersection operations analysis does not render the transportation analysis incomplete under CEQA. However, the Draft EIR's traffic analysis demonstrates the proposed project would add 7 trips per lane to the Bascom Avenue and Union Avenue intersection, which is below the CMP's threshold of 10 trips per lane. See Section 2.2.1 of the June 2025 VTA Transportation Analysis Guidelines and Appendices B and G to the Draft EIR. Additionally, see Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site.

Response to Comment CL-WVCC-58

The commenter provided an exhibit showing WVCC's telematic map depicting the location of jobs, location of WVCC facilities, and conceptual relocation sites.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.26 Response to Comment PC-Buchbinder: Commissioner Adam Buchbinder

Response to Comment PC-ABuchbinder-1

The commissioner questioned if parking and traffic is a part of the scope of impacts analyzed and asked what constitutes a safety issue.

Traffic operations as it presents a safety impact and VMT (measure of traffic) is part of CEQA. However, parking is not a required topic of analysis under CEQA and is outside the scope of impacts. The traffic analysis is provided in Section 3.7, Transportation, of the Draft EIR. Additionally, see Topical Response No. 1 for a response to comment related to increased traffic congestion and backup within the vicinity of the project site and Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety. Also see Response to Comment CL-WVCC-43.



2.4.27 Response to Comment PC-Palne: Commissioner Phil Alne

Response to Comment PC-PAlne-1

The commenter asked where it is appropriate to discuss concerns that are out of scope.

Topics outside of the scope of CEQA may be considered and weighed by the decisions makers prior to rendering a final decision to approve, modify, or disapprove the project. No further response is required.

Response to Comment PC-PAlne-2

The commenter provided suggestions to ask state government to pay for improvements to infrastructure if they want more housing.

The city will take into consideration the recommendations provided and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. This recommendation is beyond the scope of the proposed project and as such does not require a further response pursuant to CEQA Guidelines Section 15088.

Response to Comment PC-PAlne-3

The commenter stated Cristch Lane used to connect to this area in the past and maybe it can be reconfigured to provide access.

Cristch is a private road and as such, is not available for use by the City. Additionally, refer to Topical Response No. 4 for a response to comments related to alternate site access.

2.4.28 Response to Comment PC-AZisser: Commissioner Alan Zisser

Response to Comment PC-AZisser-1

The commenter expressed concerns related to egress/ingress to the property and only having one point of access and questioned what is being done as part of the project in terms of the roads and associated streets and what are the mitigation and improvements suggested as part of the EIR.

The project has secondary emergency egress that exists through the adjacent mobile home park and that had been negotiated by the former RDA as part of the current Campbell Technology campus. The fire department required as part of alternative means and measures approval enhanced fire protection safety requirements for the building. Additionally, see Topical Response No. 1 for a response to comment related to increased traffic congestion and backup within the vicinity of the project site, Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety, Topical Response No. 4 for a response to comments related to alternate site access, and Topical Response No. 6 for a response to comment related to emergency access and response.



Response to Comment PC-AZisser-2

The commenter questioned if sewer capacity and stormwater capacity are evaluated in the Draft EIR.

An analysis of sewer capacity is provided in Section 3.9, Utilities and Service Systems of the Draft EIR and stormwater capacity is discussed in Initial Study Section 3.10. Hydrology and Water Quality (provided as Appendix A to the Draft EIR), and Section 7.0, Effects Found Not to be Significant, in the Draft EIR.

Response to Comment PC-AZisser-3

The commenter questioned if the construction schedule outlined is a standard kind of schedule for a project this size and can there be anything done beyond what is included in the Draft EIR to mitigate the issue of ongoing construction in that time frame or a way to collapse it.

The project construction schedule is provided in Section 2.3, Project Construction, in the Draft EIR. The proposed construction schedule is similar and comparable to similar projects of size and scale. Additionally, as outlined in Section 3.1, Air Quality, the proposed project would be required to minimize construction exhaust emissions as part of Mitigation Measure AIR-1. As outlined in the Draft EIR, implementation of Mitigation Measure AIR-1 would reduce potential construction related impacts for air emissions and the Draft EIR did not identify any other potentially significant impacts related to construction. The commenter's question regarding if there is a way to collapse the construction schedule do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

Response to Comment PC-AZisser-4

The commenter asked where traffic congestion be handled if it is not part of the scope of the EIR and provided suggestions that city and council look into the issue in conjunction with project to come up with solutions that the city is responsible for.

Offsite existing traffic impacts is beyond the scope of the proposed project and reduction of existing traffic impacts beyond the project's contribution to the impact is beyond the scope of the proposed project. The commenter's suggestion that the city and city council look into a specific issue related to traffic congestion do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088. Additionally, see Topical Response No. 1 for a response to comment related to increased traffic congestion and backup within the vicinity of the project site.



2.4.29 Response to Comment PC-GAquilina: Vice Chair Gary Aquilina

Response to Comment PC-GAquilina-1

The commenter asked what time of day the AQ measurements were taken and observed. The commenter expressed concerns with use of model and asked what is the model based on (historical component) and would like to see someone going out to the site and measuring AQ during peak vehicle times and during operation of adjacent industrial uses.

No real-time air quality measurements were taken for the proposed project as the air quality analysis relies on modeling to estimate potential operational emissions that could result from a proposed project. As outlined in Section 3.1, Air Quality, of the Draft EIR, the air analysis utilized the California Emissions Estimator Model (CalEEMod) to model potential air emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod quantifies direct GHG emissions, such as construction and operational activities and vehicle use, and indirect emissions, such as energy use, solid waste disposal, vegetation planting and/or removal, and water use. Further, CalEEMod identifies mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from measures chosen by the user. CalEEMod was developed for the California Air Pollution Control Officers Association in collaboration with the California Air Districts. Default data (e.g., emission factors, trip lengths, meteorology, source inventory) have been provided by the various California Air Districts to account for local requirements and conditions. CalEEMod is a comprehensive tool for quantifying air quality impacts from land use projects located throughout California. The model can be used for a variety of situations where an air quality analysis is necessary or desirable, such as preparing CEQA or National Environmental Policy Act documents, conducting pre-project planning, and verifying compliance with local air quality rules and regulations, etc. CalEEMod version 2022.1.1.29 was used to estimate construction and operational emissions of the proposed project.

Response to Comment PC-GAquilina-2

The commenter stated City Council and the city needs to address the traffic issue if it is not within the scope of impacts for the Draft EIR.

Traffic considerations within the scope of CEQA are analyzed in Section 3.7, Transportation, of the Draft EIR, and Appendix G of the Draft EIR, as well as in the Topical Responses of the Final EIR. Offsite existing traffic impacts is beyond the scope of the proposed project and reduction of existing traffic impacts beyond the project's contribution to the impact is beyond the scope of the proposed project. The commenter's suggestion that the city and city council look into a specific issue related to traffic do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.



2.4.30 Response to Comment PC-DFields: Chair Davis Fields

Response to Comment PC-DFields-1

The commenter questioned how the public comments received during NOP scoping was utilized and if anything changed based on the public comments. How much input has shaped the plan.

Public comments provided during the NOP Scoping Period are outlined in Table 1.2-1 of the Draft EIR, and written comments received during the NOP Scoping Period and applicant responses are included in Appendix B to the Draft EIR. Comments received that were relevant to the proposed project's environmental analysis were considered during preparation of the Draft EIR. If certain concerns were identified by multiple commenters, such as those related to noise and transportation, those comments were considered in the analysis of potential impacts and a more detailed analysis was provided for topics where concerns were identified.

2.4.31 Response to Comment PC-MKamkar: Commissioner Matt Kamkar

Response to Comment PC-MKamkar-1

The commenter provided potential solution to put highway on ramp and off ramp under 17 north to not have to utilize McGlincy and stated this possibility is worth analyzing in the EIR.

A highway on and off ramp is not a proposed component of this project and is not analyzed in the Draft EIR. The city cannot condition a project to include development of a new highway on and off ramp to resolve an existing transportation congestion issue. Construction of highway on and off ramps requires a phased, multi-year process involving initial feasibility studies, environmental impact reviews (National Environmental Policy Act/CEQA), ROW acquisition, and physical grading and would require consultation with Caltrans and other transportation related agencies. As the city has not initiated any of described processes, a potential highway on and off ramp in the vicinity of the project site cannot be included as part of this proposed project and cannot be included in the Draft EIR analysis.

2.4.32 Response to Comment PC-MRodriguez: Matt Rodriguez – West Valley Construction

Response to Comment PC-MRodriguez-1

The commenter provided background information for their company and existing operations.

General comments providing information do not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.



Response to Comment PC-MRodriguez-2

The commenter stated concerns related to access, public safety, and industrial compatibility. Stated concerns that project relies on the same limited access route as multiple active industrial businesses and stated the Draft EIR does not adequately analyze real world conditions (trucks blocking roadway, etc.), heavy truck access.

Impacts to public services, including public safety related to police and fire service, are analyzed in Section 7.0, Effects Found Not to be Significant, on pp. 7-224 and 7-225 of the Draft EIR. Additionally, refer to Topical Response No. 4 for a response to comments related to alternate site access, Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations, Topical Response No. 6 for a response to comment related to emergency access and response, and Topical Response No. 7 for a response to comment regarding the environmental setting and baseline conditions.

2.4.33 Response to Comment PC-CDarman: Chris Darman – West Valley Construction

Response to Comment PC-CDarman-1

The commenter stated the Draft EIR's transportation analysis relies on assumptions and the analysis understates queuing temporary roadway blockages and operation conflicts that would be exaggerated by the project. Emergency access and public safety - truck maneuvering and temporary access blockages can delay their ability to respond to emergency calls for service. The commenter stated the Draft EIR does not demonstrate reliable emergency access to project site or surrounding industrial areas. The commenter stated the Draft EIR does not provide an adequate and meaningful response to prior comments submitted and stated the Draft EIR does not discuss industrial compatibility with noise and the Draft EIR excludes or minimizes existing activity when establishing baseline conditions. The commenter urges the city to address these issues in Draft EIR.

Public comments provided during the NOP Scoping Period are outlined in Table 1.2-1 of the Draft EIR. Comments received that were relevant to the proposed project's environmental analysis were considered during preparation of the Draft EIR. If certain concerns were identified by multiple commenters, those comments were considered in the analysis of potential impacts and a more detailed analysis was provided for topics where concerns were identified. The Draft EIR addresses vehicle queues and the proposed project's effect on them. As outlined in the traffic analysis supporting the Draft EIR (Appendix G to the Draft EIR), the analysis identifies two movements where the existing queues are currently substandard, meaning the queues exceed the available storage at the two given intersections (Draft EIR Appendix G, pp. 30 to 31). The proposed project's effect on the queues is negligible, lengthening these queues by one car length under existing conditions, and by two car lengths under the cumulative conditions. There is no evidence the proposed project would result in significant queuing impacts. Minor striping will occur via an independent City project, and will counteract the one- to two-car queue addition of the proposed project. Additionally, refer to Topical Response No. 5 for a response to comment related to conflicts with existing industrial uses and operations, Topical Response No. 6 for a response to comment related to emergency access and response, and Topical Response No. 7 for a response to comment regarding the environmental setting and baseline conditions.



2.4.34 Response to Comment PC-SLandry: Susan Landry

Response to Comment PC-SLandry-1

The commenter stated the Draft EIR gave an incomplete summary of their comments provided during the NOP scoping and stated concerns with traffic backup at Curtner and McGlincy. The commenter stated that the Draft EIR response said Curtner is more than 0.4-mile away and does not require CEQA unless a significant safety related issue is identified. The commenter stated the Draft EIR does not mention Curtner in the description of roadways and you cannot get from McGlincy to SR-17 without going on Curtner. The commenter noted traffic backup at Curtner and McGlincy will result in traffic cutting through Campbell Village and Union and cut through Central Park. Stated the intersection of Central Park Avenue and Union is within 1,950 feet that is less than 0.4-mile. Issue is the traffic will go around through Campbell Village. The commenter stated their safety concern on Central Avenue, Dallas, Solarno, into Campbell Village onto Cutner. The multimodal plan is starting to address that issue but there's nothing that addresses the impact.

To the extent the commenter claims that Curtner Avenue was not taken into account, such is not accurate. The Draft EIR discusses Curtner Avenue multiple times, including on pp. 3-145, and complete NOP comments, including those concerning Curtner Avenue, are included as Appendix B to the Draft EIR. Table 1.2-1: Comments Received on the NOP in the Draft EIR only provides a brief summary of the overall comments provided during the NOP Scoping Period and written comments received during the NOP Scoping Period are provided in Appendix B to the Draft EIR. Responsive comments to concerns about Curtner Avenue are also included in Appendix B, and Curtner Avenue is accounted for as a studied intersection in Appendix G to the Draft EIR. During AM peak hours, which appear to concern the commenter, approximately 115 total trips heading away from the project site are anticipated, as indicated, for instance, in Table 6 of Appendix G. Approximately 50 percent of project traffic exiting the site is anticipated to turn west on East McGlincy Lane and the remaining 50 percent is anticipated to turn east on East McGlincy Lane. While Curtner Avenue might be congested by westerly traffic, congestion is not a CEQA consideration, and there is no evidence that project traffic would create or increase any risks along this roadway. There also is no evidence any significant project traffic would "cut through" Cambell Village streets but, even if such were to occur, more vehicle traffic does not, absent any specific evidence, result in land use conflicts, traffic safety concerns, or other impacts. Regarding issues pertaining to sidewalks, project mitigations will ensure sidewalk connectivity to destinations east of the project site, and there are no pedestrian destinations west of the project site. Topical Responses, as indicated below, address these concerns in more detail. Refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site and Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety.

2.4.35 Response to Comment PC-GMartinhan: Graciela Martin-Han

Response to Comment PC-SGMartinhan-1

The commenter provided background on where they live and stated not providing alternative proper access is putting pressure on Campbell Village.



Refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site and Topical Response No. 4 for a response to comment related to alternative site access.

2.4.36 Response to Comment PC-TPedia: Tony Pedia

Response to Comment PC-TPedia-1

The commenter stated there is currently no parking along Edith Morley Park and questions how the project will address the issue with the park being there and the traffic going through, currently backed up. The commenter noted a lot of vehicles that sit by park.

As outlined in Section 2.2.8, Parking, of the Draft EIR, the proposed project would provide a total of 718 parking spaces onsite to accommodate the proposed residential development and would provide more parking spaces than required per Campbell Municipal Code Section 21.28.040. Of the total 718 parking spaces, 580 parking spaces would be provided as residential in-garage spaces and 138 spaces would be guest parking spaces dispersed throughout the site. As such, the project residents and any visitors would be anticipated to park within the project site and would not utilize street parking available along nearby roadways. The comment does not raise specific environmental concerns regarding the adequacy or accuracy of the Draft EIR's coverage of physical environmental impacts. All comments received during the public review period of the Draft EIR are discussed and considered in this Final EIR. The comments may be considered and weighed by the decision makers prior to rendering a final decision to approve, modify, or disapprove the project. Therefore, no further response to these comments is required pursuant to CEQA Guidelines Section 15088.

2.4.37 Response to Comment PC-NStrange: Natalia Strange

Response to Comment PC-NStrange-1

The commenter provided background that they live on West Valley Drive and own property there. The commenter stated the Draft EIR does not adequately analyze how traffic from this project will function within a physically constrained road network. The commenter stated the project is relying on single access point feeding into an already congested two lane road on McGlincy and that road feeds into Curtner, Union, and West Valley Drive which are all roads that are already heavily impacted during peak hours. The commenter stated the Draft EIR should analyze whether project-generated traffic will queue back into the site or spill into the public roadway and how that interacts with existing congestion on surrounding streets. Additionally, the commenter stated the Draft EIR does not provide clear analysis of pedestrian safety given the lack of sidewalks on McGlincy and the project will exacerbate existing conditions. Unclear how traffic impacts can be less than significant or mitigated. The commenter questioned if the Draft EIR be revised to include additional analysis and specific enforceable mitigation measures.

The comment that roadways are physically constrained is not accurate as area roadways are sufficiently wide to accommodate traffic from a mix of land uses and were designed and constructed in accordance with City standards and requirements. The Draft EIR addresses vehicle queues and the proposed project's effect on them. In the traffic analysis supporting the Draft EIR (Appendix G to the Draft EIR), the



analysis identifies two movements where the existing queues are currently substandard, meaning the queues exceed the available storage at the two given intersections (Draft EIR Appendix G, pp. 30 to 31). The proposed project's effect on the queues is negligible, lengthening these queues by one car length under existing conditions, and by two car lengths under the cumulative conditions. There is no evidence the proposed project would result in significant queuing impacts. Additionally, minor striping is proposed as a project condition to counteract the one- to two-car queue addition of the project. Refer to Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site, Topical Response No. 2 for a response to comment related to pedestrian and bicycle safety, and Topical Response No. 4 for a response to comments related to alternate site access. Also see Topical Response No. 5 for a response to comments related to conflicts with existing industrial uses and operations and Topical Response No. 7 for a response to comment related to environmental setting and baseline conditions.

2.4.38 Response to Comment PC-TLaFrance: Trudy LaFrance

Response to Comment PC-TLaFrance-1

The commenter stated they are glad that there would be more housing built but is concerned about local residents being able to safely exit their neighborhood at Union and Curtner and traffic cutting through neighborhood. The commenter stated the accident discovery completed only covered a 5 year period and there needs to be more study on that.

Traffic data for the preceding five-year period is relevant and comprehensive information for purposes of a traffic analysis. Data older than five years would not provide any meaningful information affecting the CEQA analysis, and the commenter presents no information that examining historical data would provide useful information. The SWITRS report shows five collisions in the area for the years 2019 to 2024. Four collisions resulted in visible injuries, while one resulted in a complaint of pain injury. No fatal or severe injury collisions were reported. The most common primary collision factors were unsafe speed (four collisions), improper turning (one collision). Two collisions involved a pedestrian and two collisions involved a motorcyclist. No collisions involved bicyclists. The collision analysis has been corrected to reflect five reported collisions based on SWITRS data for the years 2019 to 2024. This correction does not change the conclusions of the transportation analysis or the CEQA determination. No “significant new information” is introduced that would warrant recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Additionally, see Topical Response No. 1 for response to comment regarding increased traffic and congestion impacts within the vicinity of the project site.

3.0 REVISIONS TO THE DRAFT EIR

3.1 INTRODUCTION

This section includes minor edits to the Draft EIR. These modifications resulted from minor clarifications and staff-initiated changes.

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. Changes are provided in revision marks (underline for new text and ~~strikeout~~ for deleted text).

3.2 MINOR CHANGES AND EDITS TO THE DRAFT EIR

3.2.1 DEIR Section 2.0 Project Description

Section 2.1.5 – Surrounding Land Uses; Page 2-22.

The project site is surrounded by the following land uses:

- **North** –SR-17
- **East** –single-family residential uses
- **South** – Campbell Technology Parkway, Edith Morley Park, and commercial uses
- **West** – SR-17

The area surrounding the project site is characterized by a diverse mix of uses. To the east of the project site, a number of residential developments exist, including the Paseo de Palomas mobile home community, the Union Manor Apartments, and the Woodleaf Apartments. The Campbell Village Neighborhood is located to the south, beyond the southerly frontage of East McGlincy Lane. Additional residential homes are located along East McGlincy Lane. Additionally, there are a significant number of commercial uses in the project vicinity, including commercial service businesses (e.g., auto repair), business support services, professional offices (e.g., insurance and architectural services offices), gyms and fitness studios, pet grooming services, and medical care providers. Some light industrial uses are also located in the project vicinity along East McGlincy Lane.

Section 2.2.9 Utilities – Water Supply; Page 2-35.

Water service at the project site is provided by the San Jose Water Company (SJWC). The proposed project would include the installation of new 8-inch water lines throughout the site that would connect to the existing 8-inch potable water mains within Campbell Technology Parkway. The ~~Applicant determined that the~~ proposed project is anticipated to have an annual water usage of ~~30~~ 25.6 million gallons per year (mgy). This demand estimate was calculated using a flow generation rate of ~~109~~ 97 gallons per capita per day (gpcd) assumed per the ~~2020~~ 2025 Urban Water Management Plan (UWMP) and the City's average

household size of ~~2.6~~ 2.49 persons per household per the ~~U.S. Census Bureau, last updated in 2021~~ City's 2022 General Plan EIR.

Section 2.2.10 Offsite Improvements Page 2-38.

The proposed project would include construction of several offsite improvements to support the development. The proposed project would ~~widen Campbell Technology Parkway and~~ construct improvements along the Campbell Technology Parkway frontage ~~is proposed~~ which include new curb and gutters, sidewalks, and accessible curb ramps at all pedestrian road crossings. Additionally, new street trees, street lighting, and fire hydrants are proposed along the Campell Technology Parkway frontage. Stormwater bioretention areas would be provided to treat the stormwater from the roadway along the project frontage and new storm drain infrastructure would be provided to serve the stormwater treatment areas. Additionally, the proposed project would include sanitary sewer, water, and storm drain connections to the existing infrastructure within the Campbell Technology Parkway frontage.

3.2.2 DEIR Section 3.5 Land Use and Planning

Section 3.5.5 Environmental Impacts – Impact LU-b – Table 3.5-1: 2001 General Plan Consistency Analysis; Page 3-120.

LUT-7.1: Road Maintenance: Maintain and repair roads.	**Consistent.** As outlined in Section 2.2.10, Offsite Improvements, the proposed project would include offsite roadway improvements including ~~widening of Campbell Technology Parkway and~~ improvements along the Campbell Technology Parkway frontage that would include new curb and gutters, sidewalks, and accessible curb ramps at all pedestrian road crossings.
LUT-7.2: Public Utilities and Improvements: Provide a comprehensive network of sidewalks, public utilities and multi-modal improvements that are safe, attractive, efficient, well maintained and accessible for pedestrians, bicyclists and motorists.	**Consistent.** As outlined above under discussion of Policy LUT-7.1, the proposed project would include offsite improvements including ~~widening of Campbell Technology Parkway and~~ improvements along the Campbell Technology Parkway frontage that would include new curb and gutters, sidewalks, and accessible curb ramps at all pedestrian road crossings. In addition, the proposed project includes implementation of Mitigation Measure TRANS-1 which outlines specific pedestrian improvements to be constructed by the proposed project. Additionally, the proposed project would include construction of new utility improvements on and offsite. All utilities and infrastructure improvements proposed as part of the project would be designed and constructed in accordance with City standards and regulations.

3.2.3 DEIR Section 3.7 Transportation

Section 3.7.1 Environmental Setting – Roadway System; Page 3-153.

The project site is bounded by SR-17 to the north and west and Campbell Technology Parkway to the south. The following describes the local roadways that would serve the proposed project.

State Route 17. SR-17 provides regional access to the project site. SR-17 is a six-lane freeway (with additional auxiliary lanes) located along the westerly frontage of the project site. It runs generally in a north/south direction in the vicinity of the proposed project with a speed limit of 65 mph.

Campbell Technology Parkway. Campbell Technology Parkway is a two-lane undivided local street. It is approximately 1,500 feet in length with multiple driveways and does not provide through access. It begins at the stop-controlled T-intersection with East McGlincy Lane and ends at the project site. It has sidewalks on both sides of the roadway with the exception of approximately 400 feet on the east side of the roadway nearest to the intersection with East McGlincy Lane. Edith Morley Park is located on the east side of the street. On-street parking is available only along the park frontage and from 7:00 AM to 6:00 PM, Monday through Friday, parking is limited to a 3-hour duration.

East McGlincy Lane. East McGlincy Lane is classified as a Commercial/Industrial Collector in the City's General Plan and connects the proposed project's street to the City's arterial network. It is a two-lane undivided roadway with a posted speed limit of 25 mph. It is approximately 0.8 miles in length and runs from Union Avenue to Curtner Avenue.

Union Avenue. Union Avenue is classified as a Class II Arterial in the City's General Plan. In the vicinity of the project site, it is generally a two-lane roadway with sidewalks on both sides. It has a posted speed limit of 30 mph.

Curtner Avenue. Curtner Avenue is classified as a Residential Collector in the City's General Plan and is located to the south of the project site. It is a two-lane roadway with a posted speed limit of 25 mph.

Cristich Lane. Cristich Lane is a private street that abuts the project site at the southwest corner. However, because it is private street, it does not provide access to the project site nor connect to Campbell Technology Parkway. This condition would not change with the proposed project.

Section 3.7.3 Environmental Impacts – Impact TRANS-b; Page 3-162; Footnote.

The City's VMT Policy and the project screening criteria are described under Section 3.7.2 above. The City's VMT policy specifies that land use projects located within 0.5-mile of a light rail station shall be presumed to have a less than significant transportation impact on VMT presuming these projects are consistent with the General Plan. The City's VMT policy complies with state law requirements including CEQA Guidelines Section 15064.3, which states: "generally, projects within 0.5-mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact." Distance to transit for purposes of VMT evaluation is measured by straight-line distance. The proposed project site is within 0.5-mile of the Winchester light rail transit station. The project site is also located within 0.5-mile of the South Bascom Avenue and Surrey Place bus stop, which includes Routes 26 and 61, running 15- and 20-min intervals, respectively, during peak periods. While bus stops are not specifically included in the City's Transit Screening criteria, the project site's proximity to this station is relevant given that a 0.5-mile radius to a major transit stop is a commonly accepted distance for transit priority areas where it can be assumed there will be a reduction in

VMT[1]2. Finally, as already established, the City must treat the proposed project as consistent with its General Plan for all purposes under AB 1893 (Government Code 65589.5(f)(6)(D)). In light of the foregoing, the City finds that the proposed project meets the screening criteria for transit and is presumed to have a less than significant transportation impact. Therefore, the proposed project is presumed to have a less than significant VMT impact.

Section 3.7.3 Environmental Impacts – Impact TRANS-c; Page 3-164.

Campbell Technology Parkway east of East McGlincy Lane and East McGlincy Lane west of Cambell Technology Parkway were counted for vehicle classification, speed, and volume for a 24-hour period. The number of trucks on either roadway was identified to be modest (approximately 5 to 6 percent of all vehicles) and speeds along Campbell Technology Parkway were identified to be low, and the speed along East McGlincy Lane was identified to be modest. Collision data from the Statewide Integrated Traffic Records System was reviewed along East McGlincy Lane and Campbell Technology Parkway, which provide primary site access. The result indicates that there was only one collision on East McGlincy Lane over a six-year span between January 1, 2019, and December 31, 2024. The reported collision on East McGlincy Lane was located about 50 feet east of Campbell Technology Parkway and was due to improper turning. One of the vehicles was a motorcycle, and alcohol was involved. However, data from the Transportation Injury Mapping System which compiles statewide SWITRS collision records identified five collisions in the area for the years 2019 to 2024. Four collisions resulted in visible injuries, while one resulted in a complaint of pain injury. No fatal or severe injury collisions were reported. The most common primary collision factors were unsafe speed (four collisions), improper turning (one collision). Two collisions involved a pedestrian and two collisions involved a motorcyclist. No collisions involved bicyclists. Given only ~~one~~ five collisions in six years, it appears that these streets do not have a collision problem. The proposed project would add trips to the roadways but would not alter their design. Therefore, the proposed project is not expected to cause an increase in the collision rate and result in safety hazards.

3.2.4 DEIR Section 3.9 Utilities and Service Systems

Section 3.9.1 Environmental Setting – Water Supply – Potable Water Supply; Pages 3-173 - 3-174.

SJWC owns and operates its water distribution system that consists of a pipe network, which lies predominantly beneath the traveled roadways in the public street right-of-way. The SJWC provides the water supply for potable water and fire suppression in the City. SJWC's service area encompasses 139 square miles, including most of San Jose, most of Cupertino, the entire cities of Campbell, Monte Sereno, Saratoga, the Town of Los Gatos, and parts of unincorporated Santa Clara County. In addition to its own water system, SJWC also operates, maintains, and improves the Cupertino Municipal Water System through a lease agreement (SJWC ~~2021~~ 2026).

[1] *Why Creating Affordable Homes Near Transit is a Highly Effective Climate Strategy*, California Housing Partnership, May 2024.
[2] The City, in addition to their own independent analysis, reviewed a memo dated February 20, 2026, provided by the Applicants and their transportation consultants, Abrams Associated Traffic Engineering, Inc., which supported the use of straight-line distance to measure proximity to transit under the VMT Transit Screening criteria.

The regional wholesale supplier of water to the South Bay Area, which includes the SJWC, is the Santa Clara Valley Water District (Valley Water), which derives water from local, recycled, and imported supplies (City of Campbell 2022). ~~The~~ Valley Water's water supply system is comprised of storage, conveyance, recharge, treatment and distribution facilities that include local reservoirs, the groundwater basin, groundwater recharge facilities, treatment plants, imported supply, and raw and treated water conveyance facilities.

The SJWC has three primary sources of potable water supply: purchased or imported treated surface water from Valley Water, groundwater from the Santa Clara Subbasin, and surface water from local watersheds. Non-potable recycled water is a fourth and growing source of supply (SJWC ~~2021~~ 2026). On average, purchased water from Valley Water makes up over half of SJWC's total water supply. This water originates from several sources including Valley Water's local reservoirs, the State Water Project and the federally funded Central Valley Project San Felipe Division. Water is piped into SJWC's system at various turnouts after it is treated at one of three Valley Water-operated water treatment plants.

SJWC draws water from the Santa Clara Subbasin, which is part of the larger Santa Clara Valley Basin. Valley Water is responsible for maintaining the subbasin and ensuring the subbasin does not become overdrafted. Aquifers in the subbasin are recharged naturally by rainfall and streams and artificially mainly by recharge ponds operated by Valley Water. On average, groundwater from the Santa Clara Subbasin accounts for 30 to 40 percent of SJWC's total water supply.

Surface water utilized for potable water by SJWC include Saratoga Creek and Los Gatos Creek. SJWC has "pre-1914 water rights" to surface water in Saratoga Creek, Los Gatos Creek, and associated watersheds (City of Campbell 2022). SJWC diverts surface water in the local Saratoga Creek and Los Gatos Creek watersheds to one of the three SJWC water treatment plants for treatment prior to entering the distribution system. Surface water supplies are highly variable depending on annual rainfall and generally contribute less than 10 percent of total water supply. Additionally, as of ~~2020~~ 2025, recycled water made up 2 percent of the total water supply (SJWC ~~2021~~ 2026).

SJWC's is required to prepare and update a UWMP every five years. SJWC's most recent UWMP is its ~~2020~~ 2025 UWMP which includes an analysis of projected demand and supply for water in its service area through the year ~~2045~~ 2050. According to the UWMP, in ~~2020~~ 2025, the total demand for potable and non-potable water within the SJWC service area was ~~39,592~~ 33,996 million gallons (MG). The ~~2020~~ 2025 UWMP estimates that total water demand for SJWC's service area would increase to approximately ~~45,605~~ 38,119 mgy in ~~2045~~ 2050 (SJWC ~~2021~~ 2026).

Table 3.9-1 below shows a summary of current and planned water supplies and a comparison of the projected supply and demand in a normal year scenario for SJWC's service area.

Table 3.9-1: Projected Supply vs. Demand for Normal Year Scenario

	Year					
	~~2025~~	2030	2035	2040	2045	2050
Water Supply	~~44,201~~	~~44,275~~ 40,837	~~44,629~~ 40,812	~~45,156~~ 40,525	~~45,605~~ 39,982	38,119
Water Demand	~~44,201~~	~~44,275~~ 38,858	~~44,629~~ 38,769	~~45,156~~ 38,419	~~45,605~~ 37,864	37,000
Surplus or (Deficit)	~~*0*~~	~~*0*~~ *1,979*	~~*0*~~ *2,042*	~~*0*~~ *2,106*	~~*0*~~ *2,118*	*1,119*

Section 3.9.2 Regulatory Setting – State – Urban Water Management Planning Act; Page 3-175.

In 1983, the California Legislature enacted the Urban Water Management Planning Act (Water Code Sections 10610–10656). The Urban Water Management Planning Act requires that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre feet per year (afy) shall prepare and adopt an UWMP. Water suppliers are required to prepare a UWMP within a year of becoming an urban water supplier and update the plan at least once every five years. The Urban Water Management Planning Act also specifies the content that is to be included in an UWMP. It is the intention of the legislature to permit levels of water management planning commensurate with the number of customers served and the volume of water supplied. The Urban Water Management Planning Act states that urban water suppliers should make every effort to ensure the appropriate level of reliability in its water service sufficient to meet the needs of its various categories of customers during normal, dry, and multiple-dry years. The Urban Water Management Planning Act also states that the management of urban water demands, and the efficient use of water shall be actively pursued to protect both the people of the state and their water resources. SJWC is the service provider for the City and therefore, prepared the UWMP. The latest SJWC UWMP is the ~~2020~~ 2025 UWMP which was adopted in ~~2021~~ 2026.

Section 3.9.3 Environmental Impacts – Methodology for Analysis; Page 3-176.

The following analysis is based on a review of documents pertaining to the project site, including the General Plan, the General Plan EIR, ~~2020~~ 2025 UWMP, and Section 2.0, Project Description, of this EIR. The following impact discussions consider the impacts of the proposed project related to utilities and service systems in the City.

Section 3.9.3 Environmental Impacts – Impact UTIL-b; Pages 3-177 – 3-178.

As identified in Section 2.2.9, Utilities, the Applicant determined that the proposed project is anticipated to result in an average daily water demand of ~~82,126~~ 70,034 gallons per day (gpd) or ~~30~~ 25.6 mgy. This demand estimate was calculated using a flow generation rate of ~~109~~ 97 gpcd assumed per the ~~2020~~ 2025 UWMP and the City's average household size of ~~2.6~~ 2.49 persons per household per the ~~U.S. Census Bureau, last updated in 2021~~ City's 2022 General Plan EIR. The ~~2020~~ 2025 UWMP identifies that SJWC's actual water use in ~~2020~~ 2025 was ~~109~~ 97 gpcd.

~~However, as stated in the 2020 UWMP, for demand projections included in the 2020 UWMP, it was assumed that all developments constructed after 2020 would require high water efficiency fixtures and thus, a lower daily per capita water use of 75 gpcd was applied to new population growth after 2020~~

~~(SJWC 2021). Additionally, as identified in Section 3.14, Population and Housing, of the Initial Study (Appendix A), to accurately estimate the resulting population of the proposed project, the population and average household size identified in the City's most recent 2022 General Plan EIR was utilized to calculate the anticipated population growth from implementation of the proposed project. The City's 2022 General Plan EIR identifies an average household size of 2.49 persons per household. Using this more updated data and the projected daily per capita water use of 75 gpcd for new developments, the proposed project is anticipated to result in a water demand of 54,150 gpd or 19.8 mgy.~~

The ~~2020~~ 2025 UWMP identified that projected water demand in ~~2025~~ 2030 for SJWC's service boundary was ~~44,201~~ 38,858 MG. The proposed project's anticipated water demand of ~~19.8~~ 25.6 mgy would represent approximately ~~0.04~~ 0.07 percent of SJWC's total water demand for ~~2025~~ 2030. Therefore, the proposed project would not result in a substantial increase in demand for water. Additionally, as the project site is currently developed and operated as a R&D campus, there is already existing water demand at the site that is serviced by SJWC. At the time of preparation of this EIR, we do not have information regarding how much water demand exists at the site from operation of the existing R&D campus. However, as we know that there is existing water demand at the site, the existing water demand would offset some of the total water demand anticipated from implementation of the project and the anticipated increase in total water demand at the site would be less than ~~19.8~~ 25.6 mgy. The proposed project would also include design features to reduce water use such as the use of native and drought-tolerant plants and use of water efficient fixtures that would meet specified water use rates as required by the California Plumbing Code.

The ~~2020~~ 2025 UWMP identified that SJWC anticipated adequate water supplies to meet demand under normal year, single dry, and multiple dry year scenarios through ~~2045~~ 2050. Therefore, as the proposed project is not anticipated to result in substantial increases in water demand at the site, there would be sufficient water supplies available to serve the proposed project and reasonably foreseeable future development during normal, dry and multiple dry years. As such, the proposed project would result in a less than significant impact to water supplies.

3.2.5 DEIR Section 4.5 Cumulative Impact Analysis

Section 4.5.9 Utilities and Service Systems; Page 4-191.

The geographic area for cumulative utilities and service systems impacts is the service area of the utility and service systems providers. Therefore, the geographic area for cumulative water supply impacts is the service area of the SJW and WVSD which provide potable water and wastewater services to the City, respectively. As discussed in Section 3.9, Utilities and Service Systems, the analysis conducted for the proposed project determined that SJW would have adequate water supplies available to serve the proposed project and all other users and the proposed project would not result in an increase in water supply shortage. Therefore, the proposed project would result in a less than significant impact related to available water supplies. Additionally, the proposed project includes water efficiency measures to reduce anticipated demand during operation of the proposed project. Related projects in SJW's service area would have the potential to result in a cumulative impact associated with available water supplies if the related project would substantially increase demand in the City. As determined in Section 3.9, Utilities and Service Systems, the proposed project's anticipated water demand would represent approximately 0.04 percent of SJWC's total water demand for 2025. As also explained in Section 3.9, Utilities and Service

Systems, ~~and the City's 2022 General Plan EIR,~~ the ~~2020~~ 2025 UWMP identified that SJWC anticipated adequate water supplies to meet demand under normal, single dry, and multiple dry year scenarios through ~~2045~~ 2050. Finally, implementation and buildout of the General Plan, as disclosed in the 2022 General Plan EIR, would not result in the need to construct or expand water supply and treatment facilities that have not already been described and accounted for in the relevant water master plans, which include the SJWC UWMP, SCVWD UWMP, and ~~Santa Clara Valley Water District Water Supply and Infrastructure Master Plan~~ Santa Clara Valley Water District Water Supply Master Plan 2050, incorporated herein by reference.

3.2.6 DEIR Section 5.5 Alternatives Considered

Section 5.5.2 No Project Future Development Alternative -- Utilities and Service Systems; Page 5-203.

The No Project Future Development Alternative would result in an increase in water demand and wastewater generation at the site. As identified in Section 3.9, Utilities and Service Systems, the City's 2022 General Plan EIR identified an average household size of 2.49 persons per household and the ~~2020~~ 2025 UWMP identified a ~~projected daily per capita water use~~ flow generation rate of ~~75~~ 97 gpcd ~~for new residential developments~~. Utilizing this data, the No Project Future Development Alternative's 467 residential units would result in a population growth of 1,163 residents and a resulting water demand of ~~87,225~~ 112,811 gpd. The proposed project is anticipated to result in a water demand of ~~54,150~~ 70,034 gpd and therefore, the No Project Future Development Alternative would result in a greater increase in water demand over the proposed project. Additionally, the existing demand from the R&D use on the fourth project site parcel not identified for residential uses would continue to exist. However, this increase in water demand would not be substantial and the No Project Future Development Alternative's water demand of ~~87,225~~ 112,811 gpd (~~31.8~~ 41.2 mgy) would represent approximately ~~0.07~~ 0.11 percent of SJWC's total water demand for ~~2045~~ 2030, compared to the proposed project ~~0.04~~ 0.07 percent. Additionally, the No Project Future Development Alternative's residential development would be required to include design features to reduce water use, similar to the proposed project and there would be sufficient water supplies available to serve future development under the No Project Future Development Alternative.

3.2.7 DEIR Section 7.0 Effects Found Not to be Significant

Hydrology and Water Quality – Groundwater Management; Page 7-221.

The project site is underlain by the Santa Clara Subbasin which is a subbasin of the Santa Clara Valley groundwater basin. Most of the project site is paved and is not a major groundwater recharge area. The proposed project would increase the amount of impervious area by two percent on the project site from what currently exists. As the project site is not a major groundwater recharge area and most of the project site is already covered in impervious surfaces, the proposed project is not expected to substantially interfere with groundwater recharge.

San Jose Water provides municipal water services to the City and draws groundwater from the Santa Clara Subbasin, which is part of the larger Santa Clara Valley Basin. According to San Jose Water's ~~2020~~ 2025 UWMP, on average groundwater ~~made~~ makes up approximately ~~43~~ 30 to 40 percent of San Jose



Water's ~~the~~ total water supply ~~in 2020~~. As the proposed project's water demand would be supplied by San Jose Water which uses groundwater as a supply, the proposed project could decrease groundwater supplies. However, the proposed project would not result in substantial increases in water demand at the site that would require San Jose Water to increase its groundwater pumping. Therefore, the proposed project would not substantially decrease groundwater supplies or interfere with groundwater recharge such that the proposed project would impede sustainable groundwater management of the basin and impacts would be less than significant.

3.2.8 DEIR Section 9.0 References

Section 3.9: Utilities and Service Systems; Page 9-237.

~~SJWC. 2021. 2020 Urban Water Management Plan, June 2021. https://www.sjwater.com/sites/default/files/2021-06/2020%20UWMP%20FINAL%20with%20Appendices.pdf. Accessed January 2025.~~

SJWC. 2026. 2025 Urban Water Management Plan, June 2026. https://www.sjwater.com/media/filfewve/2025-uwmp-with-appendices-final.pdf. Accessed July 2026.

Section 7.0: Effects Found Not to be Significant; Page 9-238.

CPD. 2025. Campbell Police Department 2025 Year in Review. https://campbellca.hflip.co/2025YIR. Accessed March 2026.

3.2.9 DEIR Appendix G

A discrepancy between the text and the tables included in Appendix G to the Draft EIR was discovered after the public review period of the Draft EIR. The text in Appendix G correctly stated the daily pedestrian and bicycle trips that would result from the proposed project; however, the applicable tables omitted the existing daily trips from existing uses at the project site. Revisions were made to Table 1 and Table 2 on pages 5 and 7, respectively, in Appendix G to the Draft EIR which provided the Transportation Analysis prepared by Hexagon Transportation Consultants, Inc. See Appendix B to this Final EIR for the revised Draft EIR Appendix G. The Draft EIR did not include the incorrect tables as a reference in the Draft EIR's transportation analysis and as such, revisions to the Draft EIR are not required and the analysis provided in Section 3.7, Transportation, of the Draft EIR correctly states the anticipated daily pedestrian and bicycle trips from the proposed project.

4.0 LIST OF PREPARERS AND ORGANIZATIONS CONSULTED

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5.0 REFERENCES

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