CALIFORNIA ENVIRONMENTAL QUALITY ACT FINDINGS FOR THE El CAMINO REAL SPECIFIC PLAN PROJECT

I. INTRODUCTION

The City of Santa Clara, as the Lead Agency under the California Environmental Quality Act (CEQA), Public Resources Code Section 21000 *et seq.*, has prepared the Final Environmental Impact Report (EIR) for the El Camino Real Specific Plan (State Clearinghouse No. 2025010508). The Final EIR is a program EIR pursuant to Section 15168 of the State Guidelines for implementation of CEQA (CEQA Guidelines).[1] The Final EIR consists of the December 2025 Draft Environmental Impact Report (Draft EIR), and April 2026 Final EIR. The EIR addresses the environmental effects associated with implementation of the project. The EIR is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and components of the project. The EIR addresses the potential significant adverse environmental impacts associated with the project and identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate those impacts.

In determining to approve the El Camino Real Specific Plan project, which is described in more detail in Section II, the City Council certifies that the EIR reflects the City's own independent judgment and analysis under Public Resources Code Section 21082.1(a)-(c) and CEQA Guidelines Section 15090(a)(3). The City Council further makes and adopts the following findings of fact and adopts and incorporates into the project the mitigation measures identified in the EIR, all based on substantial evidence in the whole record of this proceeding ("administrative record"). Pursuant to CEQA Guidelines Section 15090(a), the EIR was presented to the City Council of the City of Santa Clara, and the City Council reviewed and considered the information contained in the EIR prior to making the findings provided in Sections IV to IX, below. The conclusions presented in these findings are based upon the EIR and other evidence in the administrative record. The documents that constitute the administrative record on which the City Council's findings are based are located at the Planning Division office at City Hall, 1500 Warburton Avenue, Santa Clara, California. This information is presented in compliance with CEQA Guidelines Section 15091(e).

II. PROJECT DESCRIPTION

Project Location

The El Camino Real Specific Plan area is comprised of approximately 238.3 acres of properties that are located immediately adjacent to the segment of the El Camino Real between Lafayette Street on the east and the City limits on the west.

[1] The State CEQA Guidelines are found in California Code of Regulations, Title 14, Section 15000 *et seq*.

Project Overview

The City of Santa Clara 2010-2035 General Plan, adopted November 2010, envisions transforming the El Camino Real corridor from a series of automobile-oriented strip malls to a tree-lined, pedestrian- and transit-oriented corridor with a mix of residential and retail uses. The proposed El Camino Real Specific Plan provides a vision and planning framework for future growth and development in the El Camino Real Corridor.

The City of Santa Clara, with support from the Santa Clara Valley Transportation Authority (VTA), was provided grant funding to develop a specific plan for El Camino Real within Santa Clara. Following a two plus-year community engagement process, the City completed the El Camino Real Specific Plan which was presented to the Santa Clara City Council for adoption on June 15, 2021. The City Council did not take action on the El Camino Real Specific Plan and the EIR was not certified. The Santa Clara City Council directed City staff to modify the plan to reduce residential density and maximum building heights. Since then, the El Camino Real Specific Plan was revised per direction received from City Council.

The El Camino Real Specific Plan builds on two supporting plans: 1) the Grand Boulevard Initiative - a regional, multi-jurisdictional effort to transform El Camino Real into a multimodal corridor; and 2) the City's 2015-2035 General Plan, which envisions El Camino Real as a tree-lined, pedestrian and transit-oriented corridor with a mix of residential and retail uses. The El Camino Real Specific Plan seeks to articulate and implement a long-range vision for the El Camino Real Specific Plan area by establishing a broad set of goals, principles, and strategies. The El Camino Real Specific Plan's Vision Statement is assembled as a set of desired outcomes, which are summarized below.

- Increase the amount of parks, green space, plazas, and other public space that encourages pedestrian activity, recreation, and access to nature.
- Integrate a variety of landscaping and street trees along the El Camino Real corridor.
- Improve the pedestrian experience, public space, aesthetics, safety, and design quality throughout the El Camino Real Specific Plan area.
- Improve pedestrian, bicycle, transit, and vehicle connections in the Plan area, with a focus on better connections between El Camino Real and adjacent neighborhoods.
- Provide a range of multimodal transportation options and improvements.
- Implement parking management solutions that most efficiently use parking resources.
- Ensure compatibility with the residential neighborhoods that are adjacent to the planning area and encourage sensitive design transitions in bulk, height, and massing, provision of public amenities, and uses and services that benefit surrounding neighborhoods.
- Increase the variety of retail amenities and amount of public space and gathering places to create destinations along the El Camino Real corridor.
- Support a diverse mix of uses within the Plan area including retail, housing, civic spaces, and community facilities.

- Support a variety of appropriately scaled and designed housing types, both market rate and affordable housing, along the corridor while protecting existing neighborhoods from privacy, shading, and traffic impacts.
- Beautify the El Camino Real corridor by improving the visual appearance and character of existing building facades, requiring high-quality design for new development and renovations, renovating streets, encouraging public art and unique street furnishings, and adding landscaping and open space.
- Create a sustainable urban environment that incorporates green building, energy efficiency, water conservation, and stormwater management best practices.
- Support health and well-being through cross-cutting strategies such as active transportation, connections to open space, access to healthy foods, and improved air quality.

Full build out of the El Camino Real Specific Plan is anticipated to occur by 2055. The El Camino Real Specific Plan includes the development of 4,392 housing units, as well as a reduction of approximately 289,000 square feet of commercial space.

Project Objectives

The El Camino Real Specific Plan is intended to achieve the following project objectives and desired outcomes as it is implemented over time.

- Land Use: Establish a land use plan and policy framework that will guide future development and redevelopment activities within the area toward multi-modal supportive uses and improvements, including; an increase in housing density to help meet the City's state-mandated Regional Housing Needs Allocation (RHNA) numbers; new development that appropriately transitions to existing adjacent residential neighborhoods, and more intensive development and public improvements focused at key nodes, which will include a concentration of retail, services, housing, and new public gathering areas.
- Transportation: Improve vehicular, pedestrian, and bicycle facilities along the El Camino Real corridor by establishing a mobility framework that balances El Camino Real's many functions while improving mobility and safety for people of all ages, means, and abilities. The Plan area's circulation network consists of the roadways and sidewalks that serve vehicles, pedestrians, bicyclists, and transit vehicles, as well as off-street shared-use paths and pedestrian-only connections.
  The El Camino Real Specific Plan envisions and accommodates improvements to transit service, including increased frequencies and better connections to the Santa Clara Transit Station, which provides Caltrain, Amtrak, and Altamont Corridor Express transit service.
- Public Realm: Provide standards and guidelines to achieve the future vision for El Camino Real. These standards and guidelines will apply to all new development in the El Camino Real Specific Plan area, as well as public improvements and extensive renovations to existing structures. Develop and implement urban design standards to improve the pedestrian

experience, public space, aesthetics, safety, and design quality throughout the Plan area to attract visitors, serve residents, and promote walking.

- Parks: Increase the amount of parks, green space, plazas, and other public space that encourages pedestrian activity, recreation, and access to nature, including recreation opportunities along Calabazas and Saratoga Creeks. In addition to the existing parkland dedication requirements of City Code Chapter 17.35, require developers to create new plazas and open spaces along the corridor that provide a place where residents and visitors can gather comfortably, that have their own distinctive identity, are safe and visually attractive, and contribute to local character. This network of open spaces could include new public neighborhood and community parks as well as publicly-accessible privately-owned open space.
- Environmental: Create a sustainable urban environment that incorporates green building, energy efficiency, water conservation, and stormwater management best practices.

III. ENVIRONMENTAL REVIEW PROCESS

In accordance with Section 15082 of the CEQA Guidelines, the City of Santa Clara prepared a Notice of Preparation (NOP) for the El Camino Real Specific Plan Project. The NOP was circulated to local, state, and federal agencies on January 17, 2025. The standard 30-day comment period concluded on February 18, 2025. The NOP provided a general description of the project and identified probable environmental impacts that could result from implementation of the project. The City of Santa Clara also held a public scoping meeting on January 30, 2025, via Zoom to discuss the project and solicit public input.

The City of Santa Clara prepared the Draft EIR in compliance with CEQA and the CEQA Guidelines. The Draft EIR was circulated to the public and local, state, and federal agencies for public review and comment for 45 days from December 12, 2025 through January 26, 2026. Notices of the availability and completion of the Draft EIR were sent directly to every agency, person, and organization that commented on the NOP, as well as the Governor's Office of Land Use and Climate Innovation. Written comments from public agencies, organizations, and individuals concerning the environmental review contained in the Draft EIR were sent to the City during the 45-day public review period on the Draft EIR.

Following the conclusion of the 45-day public review period, the City prepared a Final EIR in conformance with CEQA Guidelines Section 15132. The Final EIR includes responses to comments received by the City on the Draft EIR and any necessary text revisions to the Draft EIR. These revisions do not require recirculation of the EIR because none of the revisions constitute “significant new information” pursuant to CEQA Guidelines Section 15088.5 in as much as these changes would not result in a new environmental impact and would not cause a substantial increase in the severity of an environmental impact; and all mitigation measures will be adopted. Responses to public agency comments on the EIR were sent to the commenting agencies on March DATE, 2026.

On April 8, 2026, at a duly noticed public hearing, the Planning Commission recommended that the City Council certify the Final EIR.

IV. FINDINGS

These findings summarize the environmental determinations of the EIR about project impacts before and after mitigation, and do not attempt to repeat the full analysis of each environmental impact contained in the EIR. Instead, these findings provide a summary description of and basis for each impact in the EIR, describe the applicable mitigation measures identified in the EIR, and state the City's findings and rationale on the significance of each impact with the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the EIR, and these findings hereby incorporate by reference the discussion and analysis in the EIR supporting the EIR's determinations regarding mitigation measures and the project's impacts.

In adopting the mitigation measures outlined below, the City intends to adopt each of the mitigation measures identified in the Final EIR. Accordingly, in the event a mitigation measure identified in the Final EIR has been inadvertently omitted from these findings, such mitigation measure is hereby referred to, adopted, and incorporated in the findings below by reference. In addition, in the event the language of a mitigation measure set forth below fails to accurately reflect the mitigation measure in the Final EIR due to a clerical error, the language of the mitigation measure as set forth in the Final EIR shall control unless the language of the mitigation measure has been specifically and expressly modified by these findings.

Sections V through VI, below, provide brief descriptions of the impacts the Final EIR identified as either significant and unavoidable or less than significant with adopted mitigation. These descriptions also reproduce the full text of the mitigation measures identified in the Final EIR for each significant impact.

V. SIGNIFICANT AND UNAVOIDABLE DIRECT IMPACTS

A significant unavoidable impact is an impact that cannot be mitigated to a less than significant level if the project is implemented as proposed. The proposed El Camino Real Specific Plan would not result in any significant unavoidable impacts.

VI. SIGNIFICANT ADVERSE IMPACTS IDENTIFIED IN THE FINAL EIR THAT ARE REDUCED TO A LESS THAN SIGNIFICANT LEVEL BY MITIGATION MEASURES ADOPTED AND INCORPORATED INTO THE PROJECT

The City Council, having reviewed and considered the information contained in the EIR, hereby finds, pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1), that the following potentially significant impacts will be reduced below a level of significance with implementation of the identified mitigation measures. These findings are based on

Section 3.0 of the Draft EIR, the discussion and analysis of which are hereby incorporated in full by this reference.

Air Quality

Impact AIR-1: Development proposed under the El Camino Real Specific Plan would result in a significant operational period emissions impact.

Findings: Implementation of Mitigation Measure AIR-1.1, set forth below, which are hereby adopted and incorporated into the project, would reduce operational emissions associated with future development proposed under the El Camino Real Specific Plan by requiring projects that exceed the Bay Area Air District's thresholds to implement Transportation Demand Management programs, incorporate green building measures, and requiring all future interior spaces to be repainted with architectural coatings that meet the "Low-Volatile Organic Compounds" or "Super-Compliant" requirements as part of the Covenants, Conditions & Restrictions and/or ground leases requirements. Therefore, the operational emissions impacts from individual projects proposed under the El Camino Real Specific Plan would be reduced to a less than significant level.

Mitigation: MM AIR-1.1: Operational criteria pollutant analysis shall be conducted in accordance with the latest guidance provided by the Bay Area Air District for projects with the potential to exceed project emission thresholds. The Bay Area Air District California Environmental Quality Act (CEQA) Air Quality Guidelines provide project screening level sizes to determine if projects warrant modeling to evaluate their emissions. Projects smaller than the screening sizes listed in Table 3-1 of the Bay Area Air District[2] CEQA Air Quality Guidelines would be considered to have less than significant operational air pollutant emissions. Projects that are found to have emissions above significance thresholds would be required to implement additional mitigation measures, including, but not limited to, the measures described below:

- Proposed residential development within the El Camino Real Specific Plan area shall implement Transportation Demand Management (TDM) programs to reduce residential vehicle miles traveled as required by the City's Climate Action Plan. The TDM programs would be reviewed and approved by the Community Development Director or Director's designee prior to issuance of building permits. An annual TDM monitoring report shall be submitted to the Community Development Director or Director's designee to document each development is meeting the required TDM program reductions.
- Proposed development within the Specific Plan area shall incorporate additional green building measures such as rooftop solar photovoltaic systems, rough-ins for electric

[2] Formerly known as the Bay Area Air Quality Management District.

vehicle charging, use of efficient lighting and irrigation, and recycle water, as feasible, to the satisfaction of the Community Development Director or Director's designee.
- Developed parcels shall require within their Covenants, Conditions & Restrictions (CC&Rs) and/or ground leases requirements for all future interior spaces to be repainted only with architectural coatings that meet the "Low-VOC" or "Super-Compliant" requirements.

Impact AIR: As mitigated, the project would not result in a significant construction criteria pollutant emissions impact nor would the project result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment.

Findings: Implementation of Mitigation Measures AIR-2.1 and AIR-2.2, which are hereby adopted and incorporated into the project, would control dust and reduce construction toxic air contaminants and criteria pollutant emissions. Therefore, future developments proposed under the El Camino Real Specific Plan would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment.

Mitigation: Same mitigation as Mitigation Measures AIR-2.1 and AIR-2.2.

Impact AIR-2: Development proposed under the El Camino Specific Plan (Specific Plan) would result in significant construction air pollutant emissions due to dust generation, and emissions of toxic air contaminants (TACs) and criteria pollutants during construction.

Findings: Implementation of Mitigation Measure AIR-2.1, set forth below, which is hereby adopted and incorporated into the project, requires that the project contractor implement Construction Best Management Practices to control dust. Implementation of Mitigation Measure AIR-2.2, set forth below, which is hereby adopted and incorporated into the project, requires individual projects proposed under the El Camino Real Specific Plan to prepare a project-level construction air quality assessment that quantifies construction criteria pollutant and toxic air contaminant emissions to ensure health risks from construction do not exceed the Bay Area Air District's construction criteria pollutant emission thresholds. Therefore, future developments proposed under the El Camino Real Specific Plan would have a less than significant construction air pollutant emissions impact.

Mitigation: MM AIR-2.1: All future development projects under the Specific Plan shall implement the following Bay Area Air District-recommended Best Management Practices (BMPs):

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day;
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered;

- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited;
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph);
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used;
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph;
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a six- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of the California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points;
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation;
- Post a publicly visible sign with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints phone number shall also be visible to ensure compliance with applicable regulations;
- The contractor shall install temporary electrical service whenever possible to avoid the need for independently powered equipment (e.g. compressors).

MM AIR-2.2: Prior to receiving demolition, grading, and building permits, all future development projects under the Specific Plan shall complete a project-level construction air quality assessment that quantifies construction criteria pollutants and TACs once construction details are available. The air quality assessments shall model construction impacts and, if necessary, include measures to reduce emissions. The screening tables included in the Bay Area Air District California Environmental Quality Act Guidelines (CEQA) can be used to demonstrate less than significant criteria air pollutant emission impacts. Criteria pollutant emissions shall not exceed the Bay Area Air District construction criteria pollutant emissions thresholds. Health risks from construction TACs shall be reduced below 10 in one million excess cancer cases, a hazard index (HI) of 1.0, and a fine particulate matter where particles have a diameter of 2.5 micrometers or less (PM2.5) concentration of 0.3 micrograms per cubic meter (µg/m3). The air quality assessment shall be submitted for review and approval by the Director of Community Development or the Director's designee, once complete. If construction Bay Area Air District thresholds are exceeded, future projects shall include

measures to reduce emissions below the Bay Area Air District emissions thresholds. Emission reduction measures shall include, but not be limited to, the following measures:

- Construction equipment selection for low emissions (e.g., U.S. Environmental Protection Agency Tier 4 standards);
- Use of alternative fuels, engine retrofits, and added exhaust devices;
- Low-volatile organic compounds (VOC) paints;
- Modify construction schedule; and
- Implementation of the Bay Area Air District Basic Best Management Practices and/or additional construction mitigation measures for control of fugitive dust.

Biological Resources

Impact BIO-1: Construction activities associated with future development within the project area could result in the loss of fertile eggs, nesting raptors or other migratory birds, or nest abandonment.

Findings: Implementation of Mitigation Measures BIO-1.1 and BIO-1.2, set forth below, which are hereby adopted and incorporated into the project, would reduce impacts to nesting birds by avoiding construction of future projects during nesting bird season or completing pre-construction nesting bird surveys to minimize and/or avoid impacts to nesting birds.

Mitigation: MM BIO-1.1: Construction shall be scheduled to avoid the nesting season to the extent feasible. The nesting season for most birds, including most raptors in the San Francisco Bay area, extends from February 1st through August 31st.

MM BIO-1.2: If it is not possible to schedule demolition, construction, and tree removal between September 1st and January 31st, pre-construction surveys for nesting birds shall be completed by a qualified ornithologist to ensure that no nests would be disturbed during project implementation. This survey shall be completed no more than 14 days prior to the initiation of grading, tree removal, or other demolition or construction activities during the early part of the breeding season (February 1st through April 30th) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May 1st through August 31st).

During this survey, the ornithologist would inspect all trees and other possible nesting habitats immediately adjacent to the construction areas for nests. If an active nest is found sufficiently close to work areas to be disturbed by construction, the ornithologist, in consultation with the California Department of Fish and Wildlife, would determine the extent of a construction-free buffer zone to be established around the nest, typically 250 feet, to ensure that raptor or migratory bird nests would not be disturbed during project construction.

Impact BIO-2: Tree removal from redevelopment of individual parcels under the Specific Plan would result in a significant impact to mature trees.

Findings: Implementation of Mitigation Measures BIO-2.1 and BIO-2.2, set forth below, which are hereby adopted and incorporated into the project, would reduce impacts to trees by requiring project applicants to implement precautionary measures during site construction and to comply with the City Code and tree replacement requirements for any trees proposed for removal per General Plan Policy 5.3.1-P10. Therefore, future developments proposed under the El Camino Real Specific Plan would have a less than significant impact on trees.

Mitigation: MM BIO-2.1: Projects proposing or required to retain trees on-site shall implement precautionary measures during site construction to limit adverse environmental effects on trees protected under General Plan Policies 5.10.1-P3 and 5.10.1-P4 that are to be retained. A tree protection plan shall be prepared by a qualified arborist that, at a minimum, requires installation of an open material (e.g., chain link) fence six feet in height around the drip line and maintenance of the existing grade level around a tree and out to its drip line. Proof of tree protection measures shall be provided to the Director of Community Development or the Director's designee prior to issuance of any demolition or grading permits.

MM BIO-2.2: Project applicants under the Specific Plan shall comply with the City Code and submit permit applications for removal of all trees covered by City's tree ordinance. Any trees to be removed would require replacement on-site or off-site at a minimum 2:1 ratio per General Plan Policy 5.3.1-P10. To the extent feasible, the replacement trees shall be planted on-site and the project applicant shall comply with all other tree removal requirements imposed by the City. The minimum tree replacement size shall be a 24-inch box for all on-site plantings, with all street trees to be a minimum 36-inch box. Street tree selection shall be per City specifications; spacing, and species shall be approved by City Arborist. Tree removal permits shall be obtained prior to the issuance of any demolition or grading permits.

Impact BIO-C: As mitigated, the project would not result in a cumulatively considerable contribution to a cumulatively significant biological resources impact.

Findings: All individual projects would be required to comply with the City Code, existing regulations, and Mitigation Measures BIO-1.1, BIO-1.2, BIO-2.1, and BIO-2.2 to protect migratory and nesting birds and minimize the loss of trees; therefore, individual projects

proposed under the El Camino Real Specific Plan would not result in a cumulatively considerable contribution to a biological resources impacts.

Mitigation: Same mitigation as Mitigation Measures BIO-1.1, BIO-1.2, BIO-2.1, and BIO-2.2.

Cultural Resources

Impact CUL-1: Redevelopment of the Specific Plan area could result in impacts to unknown buried archaeological resources and human remains.

Findings: Implementation of Mitigation Measures CUL-1.1 to CUL-1.4, set forth below, which are hereby adopted and incorporated into the project, would avoid and/or reduce impacts to unknown buried archaeological resources to a less than significant level by requiring a geoarchaeological buried sensitivity assessment and Archaeological Monitoring Plan (at specific locations) and mechanical presence/absence exploration to determine if archaeological resources are present. If resources are present, investigation, data recovery, and a data recovery plan would be required. Therefore, future developments proposed under the El Camino Real Specific Plan would have a less than significant impact on unknown buried archaeological resources and human remains.

Mitigation: MM CUL-1.1: Prior to the issuance of any grading permit in the vicinity of Saratoga Creek well as the eastern end of the Project area (to the east of Pierce Street and South of El Camino Real), a geoarchaeological buried sensitivity assessment and a project-specific Archaeological Monitoring Plan shall be developed, to the satisfaction of the Community Development Director or Director's designee, and implemented to guide the project should any significant archaeological deposits be uncovered during construction. The Archaeological Monitoring Plan shall provide detailed guidance for how impact areas should be methodically excavated under the direct supervision of a qualified archaeologist. A qualified archaeologist and a representative from the local Native American community shall monitor all initial ground-disturbing activities associated with these two areas of potential sensitivity.

MM CUL-1.2: For all proposed development sites within the Specific Plan area, a qualified archaeologist shall monitor the demolition of the building foundations and any other below surface disturbances, such as but not limited to, grading, excavation, roadway improvements, potholing for utilities, utility removal, and addressing storm drain issues. After demolition activities and surface improvements are removed for projects involving excavation, and prior to other construction activities, mechanical presence/absence exploration will be completed to a depth ranging from 6.5 to 10 feet below the ground surface. Presence/absence efforts shall be conducted by a qualified local archaeologist. If any cultural resources are identified, all activity in the vicinity of such resources shall stop until a research design and treatment plan is prepared to address those types of resources encountered and such plan is approved by

the City. Any cultural resources identified shall be evaluated to determine if these resources would qualify for the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR). If no resources are found during presence/absence testing, the implementation of mitigation measures, MM CUL-1.3 and MM CUL-1.4, would ensure any resources discovered during construction are adequately protected.

MM CUL-1.3: In the event that buried, or previously unrecognized archaeological deposits or materials of any kind are inadvertently exposed during any construction activity, work within 50 feet of the find shall cease until a qualified archaeologist can assess the find and provide recommendations for further treatment, if warranted. Preservation in place is the preferred treatment of an archaeological resource. When preservation in place of an archaeological resource is not feasible, data recovery, in accord with a data recovery plan prepared and adopted by the City, is the appropriate mitigation. Construction and potential impacts to the area within a radius determined by the archaeologist shall not recommence until the assessment is complete.

Impact CUL-1.4: In the event that human remains are discovered during excavation and/or grading of the site, all activity within a 50-foot radius of the find shall be stopped. The Santa Clara County Coroner shall be notified and shall make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner shall notify the Native American Heritage Commission (NAHC) immediately. Once NAHC identifies the most likely descendants, the descendants will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the California Environmental Quality Act (CEQA) Guidelines.

Impact CUL: As mitigated, the project would not disturb any human remains.

Findings: Implementation of Mitigation Measures CUL-1.1 to CUL-1.4, set forth above, which are hereby adopted and incorporated into the project, would avoid and/or reduce significant impacts to unknown buried human remains to a less than significant level by notifying the Santa Clara County Coroner and following the necessary procedures as outlined in the CEQA Guidelines Section 15064.5(e) if human remains are found. Therefore, future developments proposed under the El Camino Real Specific Plan would not disturb any human remains.

Mitigation: Same mitigation as Mitigation Measures CUL-1.1 through CUL-1.4.

Impact CUL-C: As mitigated, the project would not result in a cumulatively considerable contribution to a cumulatively significant cultural resources impact.

Findings: As discussed under Impact CUL-1 and as a Condition of Approval for all future developments proposed under the El Camino Real Specific Plan, project applicants shall

prepare appropriate California Department of Parks and Recreation 523 Forms for any building or structure that is 50 years or older to determine whether the building or structure is eligible as a historical resource under the federal, state, or local criteria. Implementation of Mitigation Measures CUL-1.1 to CUL-1.4 would ensure that impacts to subsurface cultural resources and human remains (if encountered) would be reduced to a less than significant level. The cumulative projects are all subject to CEQA and are required to comply with the federal, state, and local regulations put in place to protect cultural resources. Therefore, future developments proposed under the El Camino Real Specific Plan would not result in a cumulatively considerable impact to cultural resources.

Mitigation: Same mitigation as Mitigation Measures CUL-1.1 through CUL-1.4.

Geology and Soils

Impact GEO-1: Development proposed under the Specific Plan has the potential to disturb paleontological resources during excavation, grading, and construction activities.

Findings: Implementation of Mitigation Measure GEO-1.1, set forth below, which is hereby adopted and incorporated into the project, would reduce or avoid impacts to paleontological resources to a less than significant level by requiring a paleontologist to monitor construction on sites requiring excavation of 10 feet or more below the ground surface. Therefore, future developments proposed under the El Camino Real Specific Plan would have a less than significant impact on paleontological resources.

Mitigation: MM GEO-1.1: Projects requiring excavation of 10 feet or more below the ground surface (bgs) would require monitoring by a qualified paleontologist. In the event paleontological resources are discovered, all work on the site shall stop immediately, the Community Development Director or Director's designee shall be notified, and a qualified paleontologist shall assess the nature and importance of the find and recommend appropriate treatment. Treatment may include, but is not limited to, preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds. The project applicant shall be responsible for implementing the recommendations of the qualified paleontologist. A report of all findings shall be submitted to the Community Development Director or Director's designee prior to the issuance of building permits.

Impact GEO-C: As mitigated, the project would not result in a cumulatively considerable contribution to a cumulatively significant paleontological resources impact.

Findings: Adherence to Mitigation Measure GEO-1.1, set forth above, which is hereby adopted and incorporated into the project, would ensure that impacts to unknown paleontological resources from construction of individual projects proposed under the El Camino Real Specific Plan are reduced to a less than significant level. Because all individual

projects would have a less than significant impact, there would be no significant cumulative impact.

Mitigation: Same mitigation as Mitigation Measure GEO-1.1.

Greenhouse Gas Emissions

Impact GHG-1: Operation of developments approved under the El Camino Specific Plan (Specific Plan) could include natural gas infrastructure resulting in a significant greenhouse gas (GHG) emissions impact.

Findings: Implementation of Mitigation Measure GHG-1, set forth below, which is hereby adopted and incorporated into the project, would reduce impacts from GHG emissions by requiring project applicants to demonstrate conformance with the City's most recent Climate Action Plan and utilizing zero nitrogen oxide water heaters and furnaces. Projects that include natural gas appliances are required to provide evidence to the Director of Community Development or the Director's designee demonstrating that GHG emissions equivalent to those emitted by the project's natural gas appliances were properly identified and offset. Therefore, individual projects proposed under the El Camino Real Specific Plan would have a less than significant GHG emissions impact.

Mitigation: MM GHG-1: Future projects approved under the Specific Plan shall be required to comply with the following measures:

- The project applicant shall demonstrate conformance with the City of Santa Clara's most recent Climate Action Plan by completing the City's Climate Action Plan Compliance Checklist at the time the project application is submitted to the City of Santa Clara.
- All new development projects under the El Camino Real Specific Plan shall utilize zero nitrogen oxide (NO_x) water heaters and furnaces consistent with the schedule in Bay Area Air District Rules 9-4 and 9-6.[3]
- Projects that include natural gas appliances shall provide evidence to the Director of Community Development or the Director's designee demonstrating that GHG emissions equivalent to those emitted by the project's natural gas appliances were properly identified and offset, and in compliance with then-current Climate Action Plan requirements, prior to the issuance of any building permit.

[3] The rules establish zero NO_x emission standards for natural gas-fired furnaces and water heaters. The proposed ultra-low and zero NO_x standards would apply to appliance retailers, wholesalers and installers and would affect Bay Area consumers at the point in time when they install a new appliance or replace their existing furnaces and water heaters. Implementation begins in January 2027, where only zero-NO_x water heaters can be sold or installed for most single-family residences. In January 2029, only zero-NO_x furnaces can be sold or installed and in January 2031, only zero-NO_x water heaters can be sold or installed for most commercial and multi-family uses.

Impact GHG-C: As mitigated, the project would not result in a cumulatively considerable contribution to a cumulatively significant GHG emissions impact.

Findings: No single land use project could generate sufficient GHG emissions on its own to noticeably change the global average temperature. Implementation of Mitigation Measure GHG-1.1, which is hereby adopted and incorporated into the project, would reduce GHG impacts to a less than significant level. Therefore, individual projects proposed under the El Camino Real Specific Plan would not result in a cumulatively considerable contribution to a GHG emissions impact.

Mitigation: Same mitigation as Mitigation Measure GHG-1.1.

Hazards and Hazardous Materials

Impact HAZ-2: Existing hazardous materials contamination in soils and groundwater on sites within the Plan area has the potential to impact construction workers and adjacent land uses if disturbed during demolition and construction activities.

Findings: Implementation of Mitigation Measure HAZ-1.1 to HAZ-1.5, set forth below, which are hereby adopted and incorporated into the project, would reduce impacts from existing hazardous materials contamination to a less than significant level by requiring a property-specific Phase I Environmental Site Assessment to be completed in accordance with American Society for Testing and Materials Standard Designation E1527-13 (or most recent version) and to evaluate if measures are needed to protect the health and safety of construction workers on-site and occupants of adjacent land uses. If warranted, a correction action/risk management plan or Site Management Plan will be prepared and implemented with all applicable regulatory oversight. Therefore, any hazardous materials impacts from individual projects proposed under the El Camino Real Specific Plan would be reduced to a less than significant level.

Mitigation: MM HAZ-1.1: Prior to the start of any demolition or construction activity, a property-specific Phase I Environmental Site Assessment (ESA) shall be completed in accordance with American Society for Testing and Materials (ASTM) Standard Designation E 1527-13 (or most recent version) to identify Recognized Environmental Conditions (RECs), evaluate the property history, and establish whether or not the property is likely to have been impacted by chemical releases. Soil, soil vapor, and/or groundwater quality studies (Phase II ESAs) shall subsequently be conducted, if warranted, based on the findings of the property-specific Phase I ESAs, to evaluate if measures are needed to protect the health and safety of construction workers on-site and occupants of adjacent land uses.

At parcels with an agricultural history, soil sampling and laboratory analyses shall be conducted to determine if agricultural chemicals are present prior to redevelopment or earthwork activities. Because pesticides were often stored within structures such as barns or

sheds, and pesticide mixing was often performed near agricultural wells on such parcels, the sampling shall include an evaluation of these areas (if they can be identified), along with the former agricultural field and orchard areas.
All site mitigation measures identified in the property-specific Phase I and II ESAs shall be completed under the oversight of an appropriate regulatory agency, such as the Santa Clara County Department of Environmental Health (SCCDEH), Department of Toxic Substances Control (DTSC), or Regional Water Quality Control Board (RWQCB). Any required cleanup/mitigation of the site during development activities shall meet all applicable federal, state, and local laws, regulations, and requirements. The project applicant shall provide the appropriate oversight agency's written approval of the site mitigation measures to the Community Development Director or Director's designee prior to the issuance of a demolition and/or grading permit.

MM HAZ-1.2: Prior to the start of earthwork activities (e.g., excavation, trenching, grading, etc.) on properties with known contaminants of concern (COC) exceeding the lower of the then-current DTSC, RWQCB, or U.S. Environmental Protection Agency (EPA) regulatory levels and/or appropriate residential/commercial screening levels, including sites having either open or closed leaking underground storage tank (LUST) or Cleanup Program Site (CPS) cases, an appropriate corrective action/risk management plan (e.g., remedial action plan [RAP], removal action workplan [RAW], or Site Management Plan [SMP], etc.) shall be prepared that reflects the results of the on-site investigations.[4] The corrective action/risk management plan shall describe mitigation measures necessary to protect the health and safety of future site occupants and establish appropriate management practices for handling and monitoring of impacted soil, soil vapor, and groundwater that may be encountered during construction activities. The corrective action/risk management plan shall be prepared by an Environmental Professional and be submitted to an appropriate overseeing regulatory agency (e.g., SCCDEH, DTSC, or RWQCB) and the City of Santa Clara Fire Department (SCFD) for review.[5] Regulatory agency approval shall be obtained prior to commencing earthwork activities. A Health and Safety Plan (HSP) shall also be prepared to establish health and safety protocols for personnel working at the site.

All mitigation measures shall be completed under regulatory agency oversight and meet all applicable federal, state, and local laws, regulations, and requirements. Following completion, a report documenting compliance with the provisions of the corrective action/risk management plan and describing the work completed shall be submitted and approved by the overseeing regulatory agency.

[4] Naturally occurring background concentrations of some metals may exceed their respective screening levels. Regulatory agencies generally do not require cleanup of contaminants in soil to below background levels. Site-specific background levels may be substituted for the published screening levels if approved by the overseeing regulatory agency.
[5] Environmental Professional refers to someone who meets the qualification requirements described in ASTM E 1527-13 and 40 CFR 312, Section 312.10.

MM HAZ-1.3: As part of the facility closure process for occupants that use and/or store hazardous materials, the SCFD requires that a closure plan be submitted by the occupants that describes required closure activities, such as removal of remaining hazardous materials, cleaning of hazardous material handling equipment, decontamination of building surfaces, and waste disposal practices, among others. Facility closure shall be coordinated with the SCFD to ensure that required closure documents are completed prior to redevelopment of site parcels or changes in use.

MM HAZ-1.4: If a project requires importing soil for property grading, the source and quality of imported soil shall be documented according to the DTSC's Clean Fill Advisory (October 2001).

MM HAZ-1.5: Groundwater monitoring wells associated with identified LUST and CPS cases shall be protected during construction. Upon written approval from the overseeing regulatory agency and the well owner, wells may be destroyed under permit from Valley Water prior to development activities. Relocation of the wells may be required.

Monitoring wells that are no longer in use, or any unidentified wells (such as former agricultural wells) encountered during construction activities, shall be properly destroyed in accordance with Valley Water Ordinance 90-1.

Prior to redevelopment of the site, well records from the California Department of Water Resources (DWR) shall be researched, and attempts shall be made to locate and properly destroy any identified abandoned on-site wells.

Any proposed well closure or destruction activities on a redevelopment site shall be completed, and any proposed well protection measures shall be approved by the Director of Public Works prior to the issuance of a grading permit. A well destruction report shall be submitted to the SCFD as proof of completion of any well closure.

Impact HAZ: As mitigated, the project would not result in a significant hazard due to hazardous materials contamination.

Findings: Within the El Camino Real Specific Plan area, one parcel is the subject of an open leaking underground storage tank case and seven parcels are the subject of open Cleanup Program Site cases. In addition, there are 28 closed leaking underground storage tank cases and seven closed Cleanup Program Site cases. These spill incidents have impacted soil, soil vapor, and/or groundwater. Implementation of Mitigation Measures HAZ-1.1 and HAZ-1.2, set forth above, which is hereby adopted and incorporated into the project, would reduce impacts from hazardous materials contamination to a less than significant level.

Mitigation: Same mitigation as Mitigation Measures HAZ-1.1 and HAZ-1.2.

Noise and Vibration

Impact NOI-1: Land uses in the project vicinity would be exposed to a substantial temporary increase in ambient noise levels due to project construction activities.

Findings: Implementation of Mitigation Measures NOI-1.1 and NOI-1.2, set forth below, which are hereby adopted and incorporated into the project, would reduce construction noise levels at nearby land uses by requiring project applicants to submit and implement a construction noise logistics plan. Therefore, construction noise impacts from individual projects proposed under the El Camino Real Specific Plan would be reduced to a less than significant level.

Mitigation: MM NOI-1.1: Develop and adhere to a construction noise control plan to be submitted to the City for review and approval prior to issuance of a demolition and/or grading permit, including, but not limited to, the following available controls.

- Ensure that construction activities (including the loading and unloading of materials and truck movements) within 300 feet of any residentially zoned property to the hours of 7:00 a.m. to 6:00 p.m. on weekdays and between the hours of 9:00 a.m. and 6:00 p.m. on Saturdays. No construction is permitted on Sundays or holidays.
- Ensure that excavating, grading and filling activities (including warming of equipment motors) within 300 feet of residentially zoned property are limited to the hours of 7:00 a.m. to 6:00 p.m. on weekdays and between the hours of 9:00 a.m. and 6:00 p.m. on Saturdays. No construction is permitted on Sundays or holidays within 300 feet of occupied residentially zoned property.
- Contractors equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment.
- Contractors utilize “quiet” models of air compressors and other stationary noise sources where technology exists.
- Locate loading, staging areas, stationary noise-generating equipment, etc. as far as feasible from sensitive receptors when sensitive receptors adjoin or are near a construction project area. Construct temporary noise barriers to screen stationary noise-generating equipment when located near adjoining sensitive land uses.
- Control noise from construction workers’ radios to a point where they are not audible at existing residences bordering the project area.
- Comply with Air Resource Board idling prohibitions of unnecessary idling of internal combustion engines.
- Construct solid plywood fences around construction sites adjacent to operational business, residences or noise-sensitive land uses.
- Route construction-related traffic along major roadways and as far as feasible from sensitive receptors.

- Businesses, residences or noise-sensitive land uses adjacent to construction sites shall be notified of the construction schedule in writing. Designate a "construction liaison" that will be responsible for responding to any local complaints about construction noise. The liaison will determine the cause of the noise complaints (e.g., starting too early, bad muffler, etc.) and institute reasonable measures to correct the problem. Conspicuously post a telephone number for the liaison at the construction site.
- Include a disclosure in the lease of future tenants within the El Camino Real Specific Plan properties that provides information regarding the ongoing construction activities within the area.

MM NOI-1.2: If pile driving occurs, the following best management practices shall be included in the construction noise control plan.

- During pile driving, pre-drill foundation pile holes to minimize the number of impacts required to seat the pile.
- During pile driving activities, install "acoustical blankets" to provide shielding for receptors located within 100 feet of the site, or use a noise attenuating shroud on the pile driving hammer.

Impact NOI-2: Mechanical equipment from future projects located in close proximity to existing residential land uses could result in noise levels in exceedance of City standards for fixed sources.

Findings: Implementation of Mitigation Measure NOI-2.1, set forth below, which is hereby adopted and incorporated into the project, would require applicants for future development projects to retain a qualified acoustical consultant to review mechanical noise from the selected equipment to determine whether the noise reduction measures sufficiently reduce noise and meet the City Code requirements. Therefore, mechanical noise impacts from individual projects proposed under the El Camino Real Specific Plan would be reduced to a less than significant level.

Mitigation: MM NOI-2.1: Prior to the issuance of building permits, mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet the City Code requirements. A qualified acoustical consultant shall be retained by the applicants for future development projects to review mechanical noise as the equipment systems are selected in order to determine whether the proposed noise reduction measures sufficiently reduce noise to comply with the City's noise and vibration level performance standards for fixed sources. Noise reduction measures that would accomplish this reduction include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers such as enclosures and parapet walls to block the line of sight between the noise source and the nearest receptors.

Impact NOI-3: Existing and planned land uses in the project vicinity could be exposed to an increase in ambient vibration levels beyond applicable Caltrans vibration limits due to project construction activities.

Findings: Implementation of Mitigation Measure NOI-3.1, set forth below, which is hereby adopted and incorporated into the project, would require future development projects to incorporate measures into the project, including implementation of a construction vibration-monitoring plan, to reduce vibration impacts. Therefore, vibration impacts from individual projects proposed under the El Camino Real Specific Plan would be reduced to a less than significant level.

Mitigation: MM NOI-3.1: The following measures would be incorporated into the project to reduce vibration impacts:

- Comply with the City Code construction hours requirements to limit the hours of exposure to surrounding properties. The City Code limits construction activities within 300 feet of residentially zoned property to the hours of 7:00 a.m. to 6:00 p.m. on weekdays and between the hours of 9:00 a.m. and 6:00 p.m. on Saturdays. No construction is permitted on Sundays or holidays within 300 feet of occupied residentially zoned property.
- Prohibit impact or vibratory pile driving as a method of construction.
- Limit the use of vibratory rollers, hoe rams, large bulldozers, and caisson drilling, and avoid clam shovel drops within 65 feet of the property lines shared with residences and commercial structures adjacent to the site.
- Place operating equipment on the construction site as far as possible from vibration-sensitive receptors.
- Use smaller equipment to minimize vibration levels below the limits.
- Select demolition methods not involving impact tools.
- Avoid dropping heavy objects or materials near vibration sensitive locations.
- A list of all heavy construction equipment to be used for this project known to produce high vibration levels (tracked vehicles, vibratory compaction, jackhammers, hoe rams, etc.) shall be submitted to the City by the contractor. This list shall be used to identify equipment and activities that would potentially generate substantial vibration and to define the level of effort required for continuous vibration monitoring.
- A construction vibration-monitoring plan shall be implemented to document conditions at the residences and commercial structures adjacent to the site prior to, during, and after vibration generating construction activities. All plan tasks shall be undertaken under the direction of a licensed Professional Structural Engineer in the State of California and be in accordance with industry accepted standard methods. The construction vibration monitoring plan should be implemented to include the following tasks:

- Identification of sensitivity to ground-borne vibration of the residences and commercial structures adjacent to the site. A vibration survey (generally described below) would need to be performed.
- Performance of a photo survey, elevation survey, and crack monitoring survey for the residences and commercial structures nearest to the site. Surveys shall be performed prior to and after completion of vibration generating construction activities located within 65 feet of the structure. This distance shall be extended to 80 feet for vibratory pile driving and 120 feet for impact pile driving. The surveys shall include internal and external crack monitoring in the structure, settlement, and distress, and shall document the condition of the foundation, walls and other structural elements in the interior and exterior of the structure.

Impact NOI-C: As mitigated, the project would not result in a cumulatively considerable contribution to a cumulatively significant noise and vibration impact.

Findings: With implementation of Mitigation Measures NOI-1.1 and NOI-1.2, set forth above, which is hereby adopted and incorporated into the project, construction noise impacts associated with future projects under the El Camino Real Specific Plan would be reduced below the City's thresholds of significance. Noise impacts from mechanical equipment would be reduced to less than significant levels with implementation of Mitigation Measure NOI-2.1, which is hereby adopted and incorporated into the project. With implementation of Mitigation Measure NOI-3.1, which is hereby adopted and incorporated into the project, construction vibration impacts would be reduced to a less than significant level.

Mitigation: Same mitigation as Mitigation Measures NOI-1.1, NOI-1.2, NOI-2.1, and NOI-3.1.

Tribal Cultural Resources

Impact TCR-1: As mitigated, the project would not result in a significant impact to tribal cultural resources.

Findings: Future projects under the El Camino Real Specific Plan would be required to implement Mitigation Measures CUL-1.1 to CUL-1.4, which are hereby adopted and incorporated into the project, to reduce impacts to unknown buried archaeological resources, including tribal cultural resources, and human remains, if encountered. Therefore, individual projects proposed under the El Camino Real Specific Plan would have a less than significant impact on tribal cultural resources.

Mitigation: Same mitigation as Mitigation Measures CUL-1.1 through CUL-1.4.

Impact TCR-C: As mitigated, the project would not result in a cumulatively considerable contribution to a cumulatively significant tribal cultural resources impact.

Findings: Cumulative projects would be required to implement Mitigation Measures CUL-1.1 through CUL-1.4, which are hereby adopted and incorporated into the project, to avoid impacts and/or reduce impacts to tribal cultural resources to a less than significant level consistent with CEQA and Assembly Bill 52 requirements.

Mitigation: Same mitigation as Mitigation Measures CUL-1.1 through CUL-1.4.

VII. GROWTH INDUCING IMPACTS

The CEQA Guidelines require that an EIR identify the likelihood that a proposed project could "foster" or stimulate "economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment" (Section 15126.2(d)). This section of the EIR is intended to evaluate the impacts of such growth in the surrounding environment.

Direct growth inducement results if a project involves construction of new housing that would result in new residents moving to the area. A project can have indirect growth-inducement potential if it establishes substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises) or if it involves a substantial construction effort with substantial short-term employment opportunities and indirectly stimulates the need for additional housing and services to support the new employment demand. Similarly, under CEQA, a project could indirectly induce growth if it expands roadway capacity or removes an obstacle to additional growth and development, such as removing a constraint on required public services or utilities (e.g., adding a sewage treatment plant that has capacity to serve demand beyond the associated project).

These findings are based on the discussion of growth inducing impacts in Section 4.0 of the Draft EIR, the discussion and analysis of which is hereby incorporated in full by this reference.

The proposed project site is within the City's existing boundaries, already served by existing infrastructure, and planned for urban uses. Redevelopment of the El Camino Real Focus Area was envisioned as part of the City's General Plan. The proposed El Camino Real Specific Plan has increased the allowed density in the El Camino Real Specific Plan area from what was assumed in the General Plan. The El Camino Real Specific Plan would result in the development of 4,392 residential units. Redevelopment of underutilized properties within the El Camino Real Specific Plan boundary would result in an estimated reduction of approximately 289,000 square feet of retail space. The impacts to infrastructure and services resulting from the proposed El Camino Real Specific Plan are described throughout the Draft EIR.

The proposed El Camino Real Specific Plan is a previously envisioned growth area in the General Plan and is not anticipated to result in increased growth outside the City where urban development is not already planned. For these reasons, the proposed El Camino Real Specific Plan would not result

in growth-inducing impacts beyond what is envisioned in the City's General Plan.

VIII. SIGNIFICANT AND IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126(c) requires that an EIR also address significant and irreversible environmental changes that may occur as a result of project implementation. Significant irreversible changes include the use of nonrenewable resources, the commitment of future generations to similar use, irreversible damage resulting from environmental accidents associated with the project and the irretrievable commitment of resources.

These findings are based on the discussion of significant and irreversible environmental changes in Section 5.0 of the Draft EIR, the discussion and analysis of which are hereby incorporated in full by this reference.

Use of Nonrenewable Resources

Future development under the proposed El Camino Real Specific Plan, during construction and operation, would require the use and consumption of nonrenewable resources. Renewable resources, such as lumber and other wood byproducts, could also be used. Unlike renewable resources, nonrenewable resources cannot be regenerated over time. Nonrenewable resources include fossil fuels and metals. Energy would be consumed during both the construction and operational phases of the El Camino Real Specific Plan development. The construction phase would require the use of nonrenewable construction material, such as concrete, metals, and plastics, and glass. Nonrenewable resources and energy would also be consumed during the manufacturing and transportation of building materials, preparation of the site, and construction of the buildings. The operational phases would consume energy for multiple purposes including building heating and cooling, lighting, appliances, and electronics. Energy, in the form of fossil fuels, would be used to fuel vehicles traveling to and from Plan area.

The proposed El Camino Real Specific Plan would result in a substantial increase in demand for nonrenewable resources. However, the project is subject to the standard California Code of Regulations Title 24 Part 6 and CALGreen energy efficiency requirements. As discussed in Section 3.6 Energy, the El Camino Real Specific Plan is consistent with the City's General Plan policies regarding energy use, which fosters development that reduces the use of nonrenewable energy resources in transportation, buildings, and urban services (utilities).

Irreversible Damage from Environmental Accidents

The project does not propose any new or uniquely hazardous uses, and its operation would not be expected to cause environmental accidents that would impact other areas. As discussed in Section 3.9 Hazards and Hazardous Materials, the El Camino Real Specific Plan area contains individual parcels that have been confirmed or may contain soil and groundwater contamination that may expose

construction workers, future occupants, and the surrounding environment to contaminated soils and soil vapor intrusion. Phase I ESAs and Phase II ESAs (if warranted) shall be implemented by future development under the El Camino Real Specific Plan to mitigate potential risks to construction workers, future occupants, and the environment from potential exposure to hazardous substances. There are no known significant unmitigable on-site or off-site sources of contamination that would substantially affect the proposed uses in the El Camino Real Specific Plan area. There are no significant geology and soils impacts from implementation of the project. Based on the discussion above, the proposed El Camino Real Specific Plan would not result in irreversible damage that may result from environmental accidents.

IX. ALTERNATIVES

CEQA requires that an EIR identify alternatives to a project as it is proposed. Section 15126.6 of the CEQA Guidelines specifies that the EIR should identify alternatives which "would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." The EIR considered alternatives of design, scope, or location, which would substantially lessen the project's significant impacts, even if those alternatives "impede to some degree the attainment of the project objectives" or are more expensive. While CEQA does not require that alternatives must be capable of meeting all of the project objectives, an alternative's ability to meet most of the objectives is relevant to its consideration.

Project Objectives

The El Camino Real Specific Plan is intended to achieve the following project objectives and desired outcomes as it is implemented over time.

- Land Use: Establish a land use plan and policy framework that will guide future development and redevelopment activities within the area toward multi-modal supportive uses and improvements, including; an increase in housing density to help meet the City's state-mandated RHNA numbers; new development that appropriately transitions to existing adjacent residential neighborhoods, and more intensive development and public improvements focused at key nodes, which will include a concentration of retail, services, housing, and new public gathering areas.
- Transportation: Improve vehicular, pedestrian, and bicycle facilities along the El Camino Real corridor by establishing a mobility framework that balances El Camino Real's many functions while improving mobility and safety for people of all ages, means, and abilities. The Plan area's circulation network consists of the roadways and sidewalks that serve vehicles, pedestrians, bicyclists, and transit vehicles, as well as off-street shared-use paths and pedestrian-only connections.
  The El Camino Real Specific Plan envisions and accommodates improvements to transit service, including increased frequencies and better connections to the Santa Clara Transit Station, which provides Caltrain, Amtrak, and Altamont Corridor Express transit service.

- Public Realm: Provide standards and guidelines to achieve the future vision for El Camino Real. These standards and guidelines will apply to all new development in the El Camino Real Specific Plan area, as well as public improvements and extensive renovations to existing structures. Develop and implement urban design standards to improve the pedestrian experience, public space, aesthetics, safety, and design quality throughout the Plan area to attract visitors, serve residents, and promote walking.
- Parks: Increase the amount of parks, green space, plazas, and other public space that encourages pedestrian activity, recreation, and access to nature, including recreation opportunities along Calabazas and Saratoga Creeks. In addition to the existing parkland dedication requirements of City Code Chapter 17.35, require developers to create new plazas and open spaces along the corridor that provide a place where residents and visitors can gather comfortably, that have their own distinctive identity, are safe and visually attractive, and contribute to local character. This network of open spaces could include new public neighborhood and community parks as well as publicly-accessible privately-owned open space.
- Environmental: Create a sustainable urban environment that incorporates green building, energy efficiency, water conservation, and stormwater management best practices.

CEQA, the CEQA Guidelines and applicable case law have determined that feasibility can be based on a wide range of factors and influences. Section 15126.6(f)(1) of the CEQA Guidelines advises that such factors can include, but are not limited to, the suitability of an alternate site, economic viability, availability of infrastructure, consistency with planning documents or regulatory limitations, jurisdictional boundaries or whether the project proposed can "reasonably acquire, control or otherwise have access to the alternative site."

The City Council, having reviewed and considered the information contained in the EIR, hereby finds that the alternatives described below are not feasible. The City finds that there are specific economic, legal, social, technological or other considerations, including consideration for the provision of employment opportunities for highly trained workers, and important matters of public policy that render these alternatives infeasible.

As explained above, "feasible" is defined in CEQA Guidelines Section 15364 to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." According to CEQA Guidelines Section 15091(a)(3), the City may reject an alternative to the project if the City finds that it would be infeasible to implement that alternative because of "[s]pecific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers." An agency also may reject an alternative that does not meet the public policy goals of the agency. In *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 947, the City of Rialto approved a project while rejecting as infeasible a reduced-density alternative that stripped out the portions of the project that would have created a synergistic mix of retail and restaurant tenants. Additionally, in *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1039, the appellate court upheld the City of Sacramento's findings that

additional preservation of open space would be infeasible because it would "at the very least [slow] 'the progress of necessary development such that the public's health and welfare is harmed through the lack of economic growth and productivity and a shortage of housing supply."[6]

These findings are based on the discussion of alternatives in Section 7.0 of the Draft EIR and Section 5.0 of the Final EIR, the discussion and analysis of which are hereby incorporated in full by this reference.

Alternatives Considered but Rejected

The CEQA Guidelines encourage consideration of an alternative site when significant effects of the project might be avoided or substantially lessened (Section 15126.6(f)(2)(A)). Only locations that would avoid or substantially lessen any of the significant impacts of the project and meet most of the project objectives need to be considered for inclusion in the EIR.

Location alternatives are frequently considered to reduce the site-specific impacts of a project. The alternative location would typically need to be of similar size to the Plan area, within the urban service area of the City, near existing transit, and have the appropriate General Plan land use designation(s). Given that the Specific Plan was developed to address planned growth within the El Camino Real Focus Area that was identified in the City's General Plan, and redevelopment in the current phase of the General Plan is a primary goal for this particular location, a location alternative was not considered further. The City has previously identified the El Camino Real Focus Area as an appropriate location for housing to meet the City's Regional Housing Needs Allocation and other goals and policies of the General Plan. Moreover, there is not an equivalent area available for redevelopment within the El Camino Real Focus Area or immediate vicinity. For these reasons, an alternative location to the Plan area was considered but rejected as infeasible.

No Project Alternative

The CEQA Guidelines specifically require consideration of a "No Project" Alternative. The purpose of including a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The Guidelines specifically advise that the No Project Alternative is "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." The Guidelines emphasize that an EIR should take a practical approach, and not "…create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment (Section 15126.6[e][3][B])."

[6] Similarly, courts have upheld an agency's infeasibility finding on a policy-based rationale in the following cases: *Gilroy Citizens for Responsible Planning v. City of Gilroy* (2006) 140 Cal.App.4th 911, 936, and *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261, 1270.

The majority of the Plan area is currently developed with residential, commercial, public, and recreational uses. The No Project Alternative assumes that the Plan area would remain as it is developed today. Because the No Project Alternative would not result in any new development with the El Camino Real Specific Plan area, this Alternative would avoid all of the environmental impacts of the project. However, this Alternative would not meet any of the City's project objectives.

No Project – Commercial, Residential and Office Redevelopment Alternative

The No Project - Commercial, Residential and Office Redevelopment Alternative assumes that the Plan area would be redeveloped with the maximum allowable development under the current zoning districts, summarized below. Maximum allowable building heights within these zoning district range from 25 to 100 feet, and the City's Zoning Code does not require height step backs for properties that abut residential neighborhoods.

Existing Zoning in the Specific Plan Area

Zoning Designation	Allowed Height Within 20 feet of R1-6L, R1-8L, and R2 zones[1]/ Within all Other Zones	Acres	Percent of Total	Allowed Uses
R4	32 feet/80 feet	1.0	0.4	Multi-family dwellings (i.e., rowhouses, townhouses, low-rise apartments)
MUCC	32 feet/40 feet	94.1	39.5	Pedestrian- oriented developments that focus on community serving commercial uses (e.g., grocery stores, banks, pharmacies, restaurants, retail establishments). A mix of residential and commercial uses, with residential on the upper floors and commercial and office on the lower floors, as well as stand-alone uses in certain circumstances, is allowed.
MURC	32 feet/60 feet	85.4	35.8	Pedestrian- oriented developments that focus on regional-serving commercial uses (e.g., big box stores, entertainment establishments, restaurants, retail establishments). A mix of residential and commercial uses, with residential on the upper floors and commercial and office on the lower floors is allowed.

Zoning Designation	Allowed Height Within 20 feet of R1-6L, R1-8L, and R2 zones[1]/ Within all Other Zones	Acres	Percent of Total	Allowed Uses
OS	25 feet/32 feet	2.4	1.0	Open space and outdoor recreational opportunities for the community.
PD	N/A	43.4	18.2	Uses consistent with the General Plan land use designation and description.
PQP	32 feet/60 feet	10.5	4.4	Public and quasi-public uses including, but not limited to government offices, fire and police facilities, transit stations, commercial care centers, religious institutions, schools, cemeteries, hospitals and convalescent care facilities, places of assembly and other facilities that have a unique public character as their primary use.
R1-6L	25 feet/25 feet	1.5	0.6	Single-family dwellings, secondary dwellings authorized by Government Code Section 65852.21, and accessory dwelling units.

Source: Raimi + Associates. Personal Communication. October 1, 2025.

Note: [1] This applies to all zoning districts listed exempt for OS and PQP. The maximum height applies to development within 20 feet of R1 and R2 zones.

The El Camino Real Specific Plan area could be developed with approximately 75 percent mixed-use, one percent residential, and 24 percent of Open Space (OS), Planned Development (PD), and Public/Quasi Public (PQP) uses under this alternative.

The most common land use existing within the El Camino Real Specific Plan area is retail commercial, with lesser amounts of public/institutional, mixed-use, medium/high density residential, single-family residential and light industrial making up the remaining properties. There are approximately 2,265,000 square feet of commercial space, including 100,000 square feet of local office uses, and 2,500 residential units existing within the El Camino Real Specific Plan area currently. Approximately 30 percent of the El Camino Real Specific Plan area's buildable land (excluding streets, rail rights-of-way, creeks, and parks) is currently occupied by buildings. Most of the remaining 70 percent is occupied by surface parking lots and associated drive aisles and landscaping.[7]

[7] City of Santa Clara. El Camino Real Specific Plan: Area Profile.

Build out of the El Camino Real Specific Plan area under the No Project - Commercial, Residential and Office Redevelopment Alternative would substantially increase vehicle trips over the existing condition, as much of the area that is currently vacant or used for parking would convert to commercial and residential uses that generate traffic. The No Project - Commercial, Residential and Office Redevelopment Alternative, which would allow a greater proportion of commercial uses to residential uses than the proposed project, would also exacerbate the City's existing jobs/housing imbalance and likely increase commute times and distances which would be a significant unavoidable impact due to inconsistency with General Plan policies that were adopted to mitigate environmental impacts. The No Project - Commercial, Residential and Office Redevelopment Alternative would also likely result in greater significant criteria pollutant impacts and potentially significant GHG emissions impacts due to the increased number of trips and VMT from workers traveling to the El Camino Real Specific Plan area.

This alternative would not meet the City's primary project objectives of increasing housing density to help meet the City's state-mandated RHNA numbers, allowing new development that appropriately transitions to existing adjacent residential neighborhoods, and allowing more intensive development and public improvements focused at key nodes, which would include a concentration of retail, services, housing, and new public gathering areas. This alternative would also be unlikely to provide substantial public open space to serve the needs of area residents. The No Project - Commercial, Residential and Office Redevelopment Alternative, therefore, would not meet the City's primary objectives for the El Camino Real Focus Area consistent with the General Plan.

Reduced Scale Development Alternative

A Reduced Scale Development Alternative would have a reduced number of residential units and a reduced amount of retail/commercial and office square footage within the boundaries of the El Camino Real Specific Plan area. The residential unit and commercial square footage totals would represent the maximum amount that would avoid any significant unavoidable impacts and achieve as many of the project objectives as possible. Any development with a smaller project of any size would be built over a shorter timeframe and have less heavy equipment use which would lessen construction and operational air quality impacts compared to the proposed project. Under this alternative, all development would still be required to implement all identified mitigation and conditions of approval identified for this project to reduce construction and operational impacts. While the Reduced Scale Development Alternative would meet the City's objectives for providing public space, increase housing density, and improve multi-modal uses, it would be at a far lower density than what is currently proposed.

Environmentally Superior Alternative

The CEQA Guidelines specify that an EIR must identify the environmentally superior alternative among those alternatives discussed. If the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative amongst the other alternatives [Section 15126.6(e)(2)].

Based upon the previous discussion, the environmentally superior alternative would be the No Project Alternative, which would avoid the identified significant impacts. This alternative would not meet the City's primary objectives of guiding future development and redevelopment activities within the area toward multi-modal supportive uses and improvements, including an increase in housing density to help meet the City's state-mandated RHNA numbers, and more intensive development and public improvements focused at key nodes, which would include a concentration of retail, services, housing, and new public gathering areas. Beyond the No Project Alternative, the Reduced Scale Development Alternative would be the environmentally superior alternative.

The Reduced Scale Development Alternative would lessen construction and operational air quality and noise impacts when compared to the project. While this alternative would meet the City's objectives, the development would be at a far lower density than what is currently proposed.

X. STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires decision makers to balance, as applicable, the economic, legal, social, technological and/or other benefits of a project against its significant and unavoidable environmental impacts when determining whether to approve the project. If the specific economic, legal, social, technological and/or other benefits of the project outweigh the significant and unavoidable impacts, those impacts may be considered "acceptable" (CEQA Guidelines Section 15093(a)). When significant impacts are not avoided or lessened, CEQA requires the agency to state, in writing, the specific reasons for considering a project acceptable. Those reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record (CEQA Guidelines Section 15093(b)).

The proposed project has no significant unavoidable impacts. As such, no overriding considerations are required.