

Open Space Element General Plan Amendment September 26, 2025

Project Description

The General Plan Amendment to the City's Open Space element consists of three primary components:

1. New trail alignments incorporated into the Parks, Recreation and Open Space diagram (Figure 5.9-1 of the General Plan)
2. Addition of policies related to carbon farming on open space land from the City's adopted Climate Action Plan.
3. Strengthening of policy language to emphasize access to open space for everyone, and towards the creation of a network of open spaces with trail linkages.

The proposed trail alignments and revised policy language are included as attachments 1 and 2 to this addendum.

Legal Basis for an Addendum

This Addendum has been prepared pursuant to Public Resources Code Section 21166 and California Environmental Quality Act (CEQA) Guidelines Section 15162, 15164, and 15168(c). This Addendum evaluates the project's potential environmental effects in light of those effects previously disclosed in the 2010 General Plan Environmental Impact Report (EIR) to determine whether any of the conditions described in Guidelines Section 15162 calling for subsequent CEQA review have occurred. The General Plan EIR is available for review at the City's Planning Division, 1500 Warburton Avenue, Santa Clara, California 95050. CEQA Guidelines Section 15164(a) provides that the lead agency "*shall prepare an addendum to a previously certified EIR if some changes or additions are necessary* but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred." Sub-Section (c) further provides that an "addendum need not be circulated for public review but can be included in or attached to the final EIR," and Sub-Section (e) states that a "brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included" in the addendum, the agency's findings, or elsewhere in the administrative record.

CEQA Guidelines Section 15168(c)(2) provides that "if the agency finds that pursuant to Section 15162, no subsequent EIR will be required, the agency can approve the activity as being within the scope of the project covered by the EIR" and that "[w]hether a later activity is within the scope of an EIR is a factual question that the lead agency determines based on substantial evidence in the record." According to CEQA *Guidelines* Section 15162, once an EIR has been certified, no subsequent or supplemental EIR shall be prepared for a project unless the lead agency determines that one or more of the following occurs:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration

due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

An addendum may be prepared if some changes or additions are necessary to a certified EIR and none of the above-stated conditions apply (*CEQA Guidelines* Section 15164).

Analysis and Conclusions

New trail alignments will allow the City to apply for grants that will help to fund the development of the Creek Trail network. At the present time, the proposed trail alignments are conceptual. Individual improvements will be analyzed for CEQA compliance during the planning stage, prior to construction. There will be no physical changes to the environment as a result of the addition of the proposed trail alignments to the General Plan.

Regarding the addition of Climate Action Plan (CAP) policies, the CAP is already an appendix to the General Plan and the policies are being put in a more prominent location to help inform discussion about the potential uses of open space. Since the Climate Action Plan was previously adopted, CAP policies have already been analyzed for CEQA compliance.

The strengthening of policy language to emphasize a network of connected open spaces for all does not change the development potential of the General Plan, nor does it in and of itself create a program of additional activities.

Taken together, the actions involved in the proposed Open Space General Plan Amendment only change the project description of the General Plan EIR and do not change the severity of the impacts, the required mitigation measures or the conclusions.

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