



May 28, 2026

City of Santa Clara
Community Development Department, Planning Division
1500 Warburton Avenue
Santa Clara, CA 95050
Attn: Meha Patel

Dear Meha,

VTA appreciates the opportunity to comment on the Mitigated Negative Declaration (MND) for the Jade at Pariva Townhome Project at 3521 and 3591 Homestead Road, shared by City staff on May 6, 2026.

VTA has reviewed the document and have the following comments:

Land Use and Project Design

VTA appreciates the project's mixed-use design and supports a mix of land uses that encourage a live-work-play activity center for the City, that offers additional opportunities for residents and employees to incrementally reduce vehicle trips and greenhouse gas emissions.

Transportation Demand Management (TDM) Measures

VTA commends the City and applicant for providing TDM measures for this project, despite the project having less than significant transportation impacts. VTA also generally supports the [City's Active TDM Measures](#) and existing TDM Program.

VTA would like to offer for consideration that are intended to refine / strengthen some of the TDM measures noted in the project's TDM Plan:

- Page 11 - "Table 2": VTA requests clarification on the line under "Program Administration" that reads "Participation in Transportation Management Association" (TMA). The City does not currently have an official TMA. Reference to TMA participation should be revised or conditioned on future TMA establishment.
- Page 12 - "Transportation Coordinator": VTA requests the Transportation Coordinator, while providing trip planning assistances, also share information on VTA TDM programs such as Vanpool, Guaranteed Ride Home, Smart Commute, and Adult Bike Education Classes.
- Page 12 - "Transportation Coordinator": VTA suggests changing the annual driveway count frequency to quarterly to develop a clearer picture of travel behavior. Note: the City's current standard requires 72-hour Tue–Thu counts by an independent third party; quarterly counts would supplement this baseline
- Page 12 - "Information Board/Kiosk": In replacement of the kiosk OR in addition to, the applicant should build a TDM portal/website for residents. An online portal drives greater engagement and aligns with the City's existing online TDM Tracking Program and reporting infrastructure.

- Page 13 - “Bicycle Storage”: Consider providing a secure bike room accessible to both residents and commercial workers to meaningfully support TDM program participation and long-term mode shift.
- Page 14 - “Bike Share Program”: VTA recommends a bike share program be substituted with another TDM measure for compliance purposes as there are no known public bike share programs planned to expand to the City of Santa Clara.
- Page 14 - “Bike Share Program”: The TDM Plan notes “the developer will provide a bike with each townhome”, if there is no bike share program in operation in the project vicinity. If bikes are purchased for each residence, they should be e-cargo bikes to better support non-SOV trips.

Additionally, please consider referring to the [TDM section of VTA’s Community Design and Transportation Manual](#) for guidance and resources related to TDM measures.

Thank you again for the opportunity to review this project. If you have any questions, please do not hesitate to contact me at [triana.crighton@vta.org](mailto: triana.crighton@vta.org), or the VTA Land Use and Development Review team at [plan.review@vta.org](mailto: plan.review@vta.org)

Sincerely,

A handwritten signature in black ink, appearing to read 'Triana Crighton', with a long horizontal line extending to the right.

Triana Crighton
Senior Transportation Planner
SC2602

Meha Patel

From: Shree Dharasker <sdharasker@valleywater.org>
Sent: Thursday, May 28, 2026 5:37 PM
To: Meha Patel
Cc: Elizabeth Elliott; Patrick Kallas
Subject: RE: Notice of Intent to adopt MND - 3521 and 3591 Homestead Road

Hi all,

Thank you for providing an extension for comments on this project.

Santa Clara Valley Water District (Valley Water) has reviewed the draft Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed 147-unit residential mixed-use project at 3521- 3591 Homestead Road in Santa Clara (Project), received on May 6, 2026, and has the following comments:

Site Location

Valley Water has no right of way at this location, so no encroachment permit will be needed in accordance with Valley Water's [Water Resources Protection Ordinance](#), and the Project is not adjacent to a creek or pipeline. Valley Water records indicate that there is one active well located on the property. The Project is located on FEMA Flood Zone X (area of minimum flood risk).

Water Supply and Demand

Given the size of the proposed development, we recommend that the applicant provide a Water Supply Assessment (WSA) with estimates of total annual water demand, including demand for fire flow requirements. WSAs help support Valley Water's management of water supply and sustainable groundwater resources in Santa Clara County.

Protection of Groundwater

- According to Valley Water's Historical Groundwater Elevation Data web tool (<https://gis.valleywater.org/Wells.html>), depths to first groundwater in the area range from approximately 20 to 30 feet below the ground surface. Groundwater depths fluctuate seasonally and annually but have been relatively high in recent years due to wet winters. Given the presence of residual subsurface contamination related to historical land uses at the site, please consider the following for the protection of groundwater quality: The State Water Resources Control Board's GeoTracker webpage (<https://geotracker.waterboards.ca.gov/>)

and US EPA's Superfund National Priorities List (<https://www.epa.gov/superfund/search-superfund-sites-where-you-live>) identify a number of environmental cleanup cases near the project area. The site itself is identified as an open cleanup investigation (Homestead Cleaners, ID T10000021700), as well as a closed Leaking Underground Storage Tank site (ID T0608500700). In the construction design, the applicant should incorporate measures to prevent the mobilization of residual or nearby subsurface contamination, creation of new pathways for contaminant migration, or any other adverse effects to groundwater quality.

- Any stormwater management feature and/or infiltration device implemented at the site should be designed to minimize groundwater quality degradation. These features/devices should maintain adequate vertical separation to seasonally high groundwater and comply with applicable sections of the Santa Clara Valley Urban Runoff Pollution Prevention Program C.3 Stormwater Handbook

Ground Water Well

If redevelopment activities necessitate the destruction of the monitoring well, such well destruction would need to occur under permit from Valley Water. Further, if the well has not been used for 3-years or more, it is considered "abandoned" per Valley Water's Well Ordinance 90-1 and would need to be destroyed under Valley Water permit or brought back into service. If the well is still in use and intended to stay in place, we would like to ensure the well is not made inaccessible for proper destruction later. Additionally, if construction activities uncover any unregistered/unknown wells, any such wells would need to be destroyed under Valley Water permit.

Please let me know if you have any questions,

Shree Dharasker
Associate Engineer Civil
Community Projects Review Unit
(408)630-3037

From: Meha Patel <mpatel@santaclaraca.gov>
Sent: Tuesday, May 26, 2026 2:12 PM
To: Shree Dharasker <sdharasker@valleywater.org>
Cc: Elizabeth Elliott <EElliott@santaclaraca.gov>; Patrick Kallas <pkallas@davidjpowers.com>
Subject: RE: Notice of Intent to adopt MND - 3521 and 3591 Homestead Road

*** This email originated from outside of Valley Water. Do not click links or open attachments unless you recognize the sender and know the content is safe. ***