

ADDENDUM
TO THE 2008 FINAL ENVIRONMENTAL IMPACT REPORT and
2013 INITIAL STUDY / MITIGATED NEGATIVE DECLARATION
FOR THE LAWSON LANE WEST CAMPUS
EXPANSION PROJECT

March 2020

1.1 PURPOSE OF ADDENDUM

The California Environmental Quality Act (CEQA) recognizes that between the date an environmental document is certified and the date the project is fully implemented, one or more of the following changes may occur: 1) the project may change; 2) the environmental setting in which the project is located may change; 3) laws, regulations, or policies may change in ways that impact the environment; and/or 4) previously unknown information can arise. Before proceeding with a project, CEQA requires the Lead Agency to evaluate these changes to determine whether or not they affect the conclusions in the environmental document.

In April 2008, the City of Santa Clara certified the *Lawson Lane Project Final Environmental Impact Report* (FEIR State Clearinghouse #2007042165) and approved the Lawson Lane Project, which included a Development Agreement between the City of Santa Clara and The Sobrato Organization (May 6, 2008, Ordinance 1838). The original Development Agreement (DA), effective June 5, 2008, included the phased development of 516,000 square feet of office/light industrial space in three buildings and an 8,000-square foot common building on the 16-acre site. The DA had a five-year term, with an option to renew for five more years, for a total 10-year term.

In April 2013, an Initial Study/Mitigated Negative Declaration (IS/MND) was approved and the Planned Development (PD) zoning and DA were amended (CEQ2012-01146, PLN2012-09224) to add 97,800 square feet of office space plus 17,158 square feet of common space (324,058 square feet total office/common space) on the Lawson Lane West Campus. The total approved development was 638,958 square feet over the entire 16-acre project site, excluding parking structures.

The DA was set to expire in June 2018. In February 2018, Sobrato requested an extension of the DA in order to build out the Lawson Lane West Campus, which is phase two of their overall campus development. On April 3 and April 24, 2018, the City Council considered and then approved the extension, setting the DA's new expiration date to June 2020. At the April 3, 2018 meeting, the City Council also approved an addendum to the 2013 IS/MND, which analyzed the proposed extension and concluded that the extension would not result in any new significant environmental impacts or substantially more severe impacts, and that no new information had come to light that would indicate the potential for new significant impacts or substantially more severe impacts.

In June 2018, the developer submitted a modified development proposal for the Lawson Lane Project to construct a building with 244,655 square feet of office space and 19,175 square feet of common space, and modifications to parking. The modified project reduced the footprint of the parking structure on the west side of Lawson Lane from 62,300 square feet to 39,737 square feet and added two above-grade levels and one below-grade level of parking to the garage. The number of spaces in the garage and surface parking lot decreased from 1,228 to 978. The City approved the architectural review of the June 2018 development proposal at the November 7, 2018 Architectural Committee

meeting. At the time the Committee approved the new architectural design, they also adopted another addendum to the 2013 IS/MND, which analyzed the June 2018 changes to the project and concluded that the June 2018 changes would not result in any new significant environmental impacts or substantially more severe impacts, and that no new information had come to light that would indicate the potential for new significant impacts or substantially more severe impacts.

Since the adoption of the addendum in November 2018, additional changes to the project have been proposed, which are the subject of this additional addendum. The purpose of this addendum is to address the project's likelihood to result in new significant impacts that were not addressed in the 2008 FEIR, 2013 IS/MND or 2018 Addendum (see section 2.0, Proposed Changes to the Approved Project).

CEQA Guidelines Section 15162 states that when an EIR has been certified or a Negative Declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the Lead Agency determined, on the basis of substantial evidence in light of the whole record, one or more of the following:

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 have not 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 measures or alternative.

CEQA Guidelines Section 15164 states that the Lead or Responsible 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 (see above) calling for preparation of a subsequent EIR have occurred.

SECTION 2.0 PROPOSED CHANGES TO THE APPROVED PROJECT

The currently approved PD Zoning and DA allow a combined total of 613,800 square feet of office and 25,158 of commons space on the east and west sides of Lawson Lane. The east side is developed with 306,900 square feet of office space, leaving 306,900 square feet of office/R&D on the west side of Lawson Lane. Building 1 is currently under construction on the west campus totaling 263,830 square feet (244,655 square feet office and 17,961 square feet amenity), leaving 62,245 square feet approved for Building 2.

The previously approved west side development includes a five-story, 244,655-square foot office building with an attached two-story 19,175-square foot with roof deck amenity building. A six-level parking garage with 897 spaces is located on the west side of the site, parallel to San Tomas Expressway. An additional 81 surface spaces provide a total of 978 parking spaces to serve the development. Landscaping would surround the building and parking structure and a hardscape courtyard would be provided south of the office building. Building 1 would be developed at a floor area ratio (FAR) of 0.798.

The currently proposed Building 2 would add 179,174 square feet of office space to the approved campus. Building 2 would mirror Building 1 on the south side of the hardscape courtyard, providing a five-story, 241,419-square foot office building attached to the Building 1 amenity building with an additional 670-square foot, two-story common building with roof deck for a total of 18,631 square feet of amenity space. Building 2 would expand the six-level parking structure to the south with 479 additional spaces, to provide a total of 1,376 structured parking spaces. Surface parking would be reduced from 81 spaces to 70 spaces to the west and south of the two office buildings, for a total of 1,445 parking spaces on the west campus.

The currently proposed Building 2 includes the following green building measures:

- Low flow toilets and fixtures
- Drought resistant planting materials
- Project will target LEED Gold equivalent
- City of Santa Clara Silicon Valley Power carbon free energy

The Sobrato Organization seeks a Planned Development (PD) rezoning of the site to include a total of 792,974 square feet of office on the aggregated 16-acre project site and architectural review of Building 2, parking structure expansion and associated site improvements on the west campus.

SECTION 3.0 ENVIRONMENTAL IMPACTS OF THE PROPOSED CHANGES TO THE PROJECT

The discussion below describes the environmental impacts of the proposed project compared to the impacts of the approved project. Also noted are any changes that have occurred in the environmental setting that would result in new impacts or impacts of greater severity than those identified in the previously certified FEIR and Initial Study/Mitigated Negative Declaration. This Addendum only addresses those resource areas which would be potentially affected by the proposed change to the approved project. The proposed project requires a PD rezoning and an amendment to the existing DA to include a total of 811,605 square feet of office on the combined east and west Lawson Lane site, and architectural review.

The proposed project would have the same or similar impacts in regard to the following environmental issues, due to the fact that the project proposes the same land use on the same site, and, for this reason, they are not discussed further:

- Agricultural Resources
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Hazards and Hazardous Materials
- Land Use
- Mineral Resources
- Noise and Vibration
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems

This Addendum analyzes the impacts of the proposed project in regard to the following environmental issues:

- Aesthetics
- Air Quality
- Greenhouse Gas Emissions
- Hydrology
- Transportation

3.1 AESTHETICS

3.1.1 Findings of the Previously Certified FEIR and Mitigated Negative Declaration

The approved Lawson Lane campus project was found to result in less than significant aesthetics impacts.

3.1.2 Aesthetic Impacts Resulting from the 2019 Modified Project

The proposed project site is located within an office and light industrial area, and is not close to a scenic vista, scenic resources, or historic buildings. The Lawson Lane east campus is developed with two five-story office buildings, an amenity building, parking structure, surface parking, and landscaping.

The project would add a second five-story office building to the Lawson Lane west campus, mirroring the approved Building 1 on the south side of the hardscape courtyard. The project would

also expand the approved six-level parking structure. The project would visually match the approved building, as part of a cohesive development, and would not substantially change the aesthetic character of the area. The architectural style and building materials of the corporate campus would remain the same as the previously approved project. The proposed building on the west site would be the same height as the previously approved building. In addition, all development on the site would be subject to the City's Architectural Review process, which would ensure the project conforms to the City of Santa Clara's adopted Community Design Guidelines. The guidelines were developed to support community aesthetic values, preserve neighborhood character, and promote a sense of community and place throughout the City. Therefore, the project would conform to applicable zoning and other regulations governing scenic quality. For these reasons, the development of the project would not substantially degrade the existing visual character of the site or its surroundings. The project would not result in a new aesthetics impact or impact of substantially greater severity than previously identified in the certified EIR and Initial Study/Mitigated Negative Declaration.

3.2 AIR QUALITY

3.2.1 Findings of the Previously Certified FEIR and Mitigated Negative Declaration

The approved Lawson Lane campus project was found to result in less than significant operational and construction-related air quality impacts, with the implementation of BAAQMD Best Management Practices for dust control.

3.2.2 Air Quality Impacts Resulting from the 2019 Modified Project

The project proposes an increase of 179,174 square feet of office space on the site. The Bay Area Air Quality Management District (BAAQMD) maintains screening sizes of various uses, below which are unlikely to result in significant construction or operational criteria pollutants. The proposed office square footage is below the BAAQMD screening size (which is 277,000 square feet for construction-related screening and 346,000 square feet for operational screening) and, therefore, would not result in new air quality impacts or impacts of substantially greater severity than previously identified in the certified Final EIR and Initial Study/Mitigated Negative Declaration. As a standard condition of approval, the project would be required to implement the BAAQMD Best Management Practices for dust control during construction.

3.3 GREENHOUSE GAS EMISSIONS

3.3.1 Findings of the Previously Certified FEIR and Mitigated Negative Declaration

As detailed in the April 2018 Addendum, the extension of the Lawson Lane Campus Development Agreement to June 2020 was not found to result in a new or greater greenhouse gas (GHG) impact than the City had identified in their General Plan FEIR. The currently approved project is consistent with the development assumptions in the General Plan. As such, the post-2020 GHG emissions from the project have been accounted for and already identified as a significant and unavoidable impact as part of the City's General Plan buildout.

3.3.2 GHG Impacts Resulting from the 2019 Modified Project

The following discussion is based on a CalEEMod analysis prepared by DJP&A in July 2019. This section analyzes the operational GHG emissions of the proposed addition of 180,647¹ square feet of office space to the approved Lawson Lane West Campus.

The following green building measures would be incorporated into the proposed project:

- Low flow toilets and fixtures
- Drought resistant planting materials
- LEED Gold standards or an equivalent
- Use of carbon free energy via Silicon Valley Power

Similar to the approved project, the current project is expected to be operational after the year 2021. For this reason, the BAAQMD 2030 GHG reduction target has been used to derive a threshold of significance for GHG emissions. For the purposes of this analysis, a “Substantial Progress” efficiency metric of 2.6 metric tons of carbon dioxide equivalent emissions per year per service population has been calculated for 2030 based on the GHG reduction goals of Senate Bill 32 and Executive Order B-30-15, taking into account the 1990 inventory and the projected 2030 statewide population and employment levels.

The results of the proposed project’s GHG emissions in terms of annual metric tons and per capita emissions of CO₂ equivalent emissions [Metric Tons (MT) of CO₂e/yr] are shown in Table 3.3-1, below.

| Table 3.3-1: Project 2021 Operational GHG Emissions | |
|--|--|
| Source Category | Project Emissions in 2021 (MT) |
| Area | .0034 |
| Energy Consumption | 558 |
| Mobile | 801 |
| Solid Waste Generation | 85 |
| Water Usage | 74 |
| Total | 1,518 |
| Service Population Emissions* | 2.47 |
| Significance Threshold | 2.6 MT CO ₂ e/year/service population |
| Significant? | No |
| Note: Based on a project service population of 614 (employees) at full buildout. | |

The rate of project GHG emissions (in terms of annual emissions per service population) was compared to the GHG significance threshold of 2.6 MT CO₂e/year/service population established by BAAQMD. With green building measures incorporated, GHG emissions would be 2.47

¹ The actual number is 179,174 square feet but the larger number was used for modeling to be conservative.

MT/year/service population. Therefore, the proposed addition would not result in a new GHG impact or impact of substantially greater severity than previously identified in the certified EIR and Initial Study/Mitigated Negative Declaration.

3.4 HYDROLOGY

3.4.1 Findings of the Previously Certified FEIR and Mitigated Negative Declaration

The approved Lawson Lane campus project was found to result in less than significant hydrology impacts with mitigation incorporated into the project design.

3.4.2 Hydrology Impacts Resulting from the 2019 Modified Project

This discussion is based on a review of the Lawson Lane West Phase II Stormwater Management Plan (SWMP), prepared by Schaaf & Wheeler in January 2019. The review analyzed the SWMP of the entire 7.6-acre project, including the current proposed project.

The Stormwater Pollution Prevention Plan (SWPPP) includes the following stormwater control measures:

- Minimize amount of land disturbed
- Minimize impervious surfaces
- Minimum-impact street or parking lot design
- Cluster structures/pavement
- Wash area/racks, drain to sanitary sewer
- Covered dumpster area, drain to sanitary sewer
- Beneficial landscaping (minimize irrigation, runoff, pesticides and fertilizers; promotes treatment)
- Maintenance (pavement sweeping, catch basin cleaning, good housekeeping)
- Storm drain labeling
- Bioretention area

The current project would increase impervious surfaces on-site by approximately 102,031 square feet and decrease pervious surfaces by approximately 102,031 square feet. Table 3.4-1 below shows the approved and proposed total square footages of pervious and impervious surfaces on the Lawson Lane west site.

| Table 3.4-1: Pervious and Impervious Surface On-Site | | | |
|---|---------------------------------------|--|---|
| Site Surface | Approved Project (square feet) | Change with Current Project (square feet) | Total with Current Project (square feet) |
| Impervious Area (roof, parking, sidewalks and streets) | 141,432 | (+) 102,031 | 243,463 |
| Pervious Area (landscaping) | 187,738 | (-) 102,031 | 85,707 |

The current project would slightly increase impervious surfaces on-site and would include the same measures as the approved project to reduce hydrology and stormwater quality impacts to a less than significant level. Therefore, the proposed addition would have a less than significant impact on hydrology. The proposed addition would not result in a new hydrology impact or impact of substantially greater severity than previously identified in the certified EIR and Initial Study/Mitigated Negative Declaration.

3.5 TRANSPORTATION

3.5.1 Findings of the Previously Certified FEIR and MND

The currently approved PD Zoning and DA allow a combined total of 613,800 square feet of office and 25,158 of commons space on the east and west sides of Lawson Lane. The east side is developed with 306,900 square feet of office space, leaving 306,900 square feet of office/R&D on the west side of Lawson Lane. Building 1 is currently under construction on the west campus totaling 263,830 square feet (244,655 square feet office and 17,961 square feet amenity), leaving 62,245 square feet approved for Building 2.

The previously approved West Campus Expansion (approved project) was found to result in less than significant transportation impacts with mitigation at the following four intersections:

- San Tomas Expressway and Walsh Avenue
- San Tomas Expressway and Benton Street
- San Tomas Expressway and El Camino Real
- San Tomas Expressway and Homestead Road

3.5.2 Transportation Impacts Resulting from the 2019 Modified Project

The discussion is based on a traffic impact analysis prepared by Hexagon Transportation Consultants in October 2019. This section analyzes potential traffic impacts of the proposed 179,174 square feet increase of office space on the site.

Study intersections were selected based upon the estimated number of project trips through the intersection. Below is a list of the study intersections:

1. Oakmead Parkway/Corvin Drive and Central Expressway
2. Bowers Avenue and Central Expressway
3. Lafayette Street and Central Expressway
4. De La Cruz Boulevard and Central Expressway
5. Mission College Boulevard and Montague Expressway
6. Scott Boulevard and Central Expressway
7. San Tomas Expressway and Walsh Avenue
8. San Tomas Expressway and Monroe Street
9. San Tomas Expressway and Cabrillo Avenue
10. San Tomas Expressway and El Camino Real
11. San Tomas Expressway and Scott Boulevard

Traffic conditions were evaluated for the following scenarios: existing conditions, baseline conditions, baseline plus project conditions, background conditions, background plus project conditions, cumulative no project conditions, and cumulative plus project conditions.

The proposed additional office space would generate 1,672 daily trips with 199 trips occurring during the AM peak hour and 198 trips occurring during the PM peak-hour. The previously approved office space was estimated to generate 3,156 daily trips with 376 trips in the AM peak hour and 372 trips in the PM peak-hour. The total office space on site would generate a total of 4,828 daily trips, with 575 trips occurring during the AM peak hour and 570 trips occurring during the PM peak hour.

Under baseline plus project conditions, the De La Cruz Boulevard/Central Expressway intersection would continue to operate at LOS F during the AM peak hour. The added project traffic would not result in a significant project impact at the intersection.

Five study intersections that would operate at an unacceptable LOS F under background conditions would continue to operate at LOS F under background plus project conditions. Nine study intersections that would operate at an unacceptable LOS F under cumulative conditions would continue to operate at LOS F under cumulative plus project conditions. The added project traffic under each of these scenarios would not result in a significant project impact, because project traffic would not cause an increase in critical movement delay of four (4) or more seconds or an increase in critical volume/capacity (v/c) of one percent (0.01) or more.

According to Santa Clara Valley Transportation Authority (VTA) Guidelines, a freeway level of service analysis is required if the number of project trips added to any freeway segment equals or exceeds one percent of the capacity of the segment. Using the Congestion Management Program's one percent threshold, a freeway level of service analysis for US 101 would be needed if the project adds 69 or more peak-hour trips to the freeway segments near the site. A review of the project trip assignment indicates that the greatest number of project trips in any direction on the subject freeway segments would be no more than 36 trips during the AM and PM peak hours. Since the number of project trips on the freeway segments are less than the one-percent threshold, the project would not cause a significant increase in traffic on the freeway segments in the study area, and a freeway level of service analysis is not required.

Pedestrian and bicycle analyses were prepared as part of the TIA by Hexagon Transportation Consultants. New pedestrian traffic could be generated by the project. The project site is surrounded primarily by office/employment land uses, various bus stops are located along Scott Boulevard, within what would be considered a walking distance (less than one half mile) from the project site. With the existing and proposed pedestrian facilities within and in the vicinity of the project site, adequate pedestrian access to and from the project site to nearby pedestrian destinations, such as the bus stops along Scott Boulevard, would be provided. Therefore, pedestrian access to and from the project site would be adequate.

The TIA assumed bicycle trips would comprise no more than one percent of the total project-generated trips, the entire project site could generate up to six new bicycle trips during the peak hours. The potential demand could be easily served by the various bicycle facilities available in the immediate vicinity of the project site. Therefore, the potential increase in bicycle trips by the project would not have an adverse effect on the existing bicycle facilities in the study area and would not require new off-site bicycle facilities.

Furthermore, the project would provide sidewalks along its entire frontage on Lawson Lane and San Tomas Expressway, a walkway along the southern property line, and a private pedestrian overcrossing north of the east driveway. In order to provide an employee-only pedestrian connection to the adjacent office development, a pedestrian crossing over Lawson Lane would be constructed to connect the two office developments. Access to the pedestrian crossing would be gated and secured with an employee key card or similar. The proposed sidewalks and overcrossing would connect the pedestrians from the project site to the bus stops on Scott Boulevard (via the east Lawson Lane site) and nearby bus stops and pedestrian destinations.

3.6 CONCLUSION

Based on the above analysis and discussion, no significant impacts would result from the currently proposed modification to the approved Lawson Lane Campus project. The proposed modification would not result in new significant environmental impacts, and no new information has come to light that would indicate the potential for new significant impacts or substantially more severe impacts than were discussed in the 2008 FEIR or 2013 Initial Study. Therefore, no further evaluation is required, and no Subsequent EIR is needed. An EIR Addendum has therefore, been appropriately prepared, pursuant to Section 15164.

Pursuant to CEQA Guidelines Section 15164(c), this Addendum need not be circulated for public review, but will be included in the public record file for the *Lawson Lane West Campus Expansion Project*.

Andrew Crabtree
Director of Community Development

Signature

Date