



May 1, 2020
To: Debby Fernandez
From: David J. Powers & Associates

**2200 Lawson Lane West Expansion Project
PLN2018-13593 (Rezone)
CEQ2018- 01064 (Addendum)**

Introduction

This memorandum addresses the environmental issues raised in public comments received by the City of Santa Clara on the Addendum for the Lawson Lane West Campus Expansion Project.

Background

An Environmental Impact Report was prepared in 2008 that approved the Lawson Lane Project, which included a Development Agreement for the phased development of 516,000 square feet of office/light industrial space in three buildings and 8,000 square foot common building on the 16-acre project site. In 2013, an Initial Study/Mitigated Negative Declaration was approved, and the Planned Development zoning and Development Agreement were amended to add 97,800 square feet of office space plus 17,158 square feet of common space on the Lawson Lane West Campus. The total approved development was 638,958 square feet over the entire project site, excluding parking structures. In June 2018, the project was modified to construct a building with 244,655 square feet of office space and 19,175 square feet of common space, with some changes to parking. The modified project reduced the footprint of the structure on the west side of Lawson Lane and added two above-grade levels and one below-grade level of parking. These changes were approved by an Addendum adopted in November 2018.

The currently proposed project, analyzed in the 2020 Addendum, would add 179,174 square feet of office space to the approved campus. The Applicant, 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.

Responses to Environmental Issues Raised in Public Comments

The comment letters received by the City are attached. Responses to these comments are discussed below.

Comment Letter A: Sam Liu

Comment A-1: It is not valid to say the proposed project would have the same or similar impacts in regard to the environmental issues listed in the Addendum, since the construction method and implementation methods vary with projects, and noise and vibrations generated during the construction process need to be analyzed to meet CEQA limits.

Response A-1: The Addendum concluded that the proposed project would have a negligible change to certain impact areas because it would comply with the mitigation measures required by the 2013 Initial Study as well as City of Santa Clara General Plan policies.

Regarding noise and vibration specifically, the previously approved projects did not require mitigation measures for noise because impacts were found to be less than significant. The Initial Study concluded that the project would create temporary impacts during project construction and that operation of the project would be consistent with General Plan policies for noise and vibration impacts. While construction techniques and equipment can vary from project to project, the noise and vibration levels will not be substantially different to the previously approved project. Further, the construction method of the proposed project will be similar to that of the previously approved project, thus there is no need for additional analysis.

Comment A-2: The analysis for the traffic impact due to this project is not adequate. This Lawson West Campus, Phase 1 plus Phase 2, is a very high density building by adding 1,445 parking spaces with a relative smaller land lot. Considering the adjacent high density office buildings such as Service Now's buildings plus the 3200 Scott Blvd building (6-story office plus 800+ parking spaces on the even smaller land lot), the proposed 2200 Lawson expansion project will have significant impacts on the local traffic, which is already very congested. Also, please note that Olcott Street, Lawson Lane, and other nearby streets impacted are all single lane roads. We didn't see the Addendum document has addressed the potential traffic jamming issues due to the very high density of parking spaces added to the neighborhood.

Response A-2: The Traffic Impact Analysis, completed by Hexagon in December 2019, analyzed traffic impacts associated with the proposed increase in office space on the project site. The results of the intersection level of service (LOS) analysis showed that none of the study intersections would be significantly impacted by the project. Five of the study intersections currently operate at an unacceptable LOS F and would continue to operate at this level with the project in place. The project traffic would increase the delay at these intersections, but the increase would be lower than the thresholds of significance adopted by the City and CMP (an increase in critical-movement delay of four or more seconds).

Additionally, as mentioned under Response A-1, the proposed project would comply with mitigation measures required by the 2013 Initial Study, which are listed below.

- As a condition of approval, the project will pay a fair share contribution toward improvement programs currently approved Tier 1 by the County of Santa Clara. Identified improvements for intersections and/or roadway segments which are listed as proposed mitigation and are not controlled by the City of Santa Clara, and are subject to financial contributions from Santa Clara, must complete the necessary environmental review and be certified by the Lead Agency with jurisdiction over the intersection/roadway in conformance with CEQA prior to the payment of fees toward those improvements.

- San Tomas Expressway and Walsh Avenue: The significant impact at this intersection would be mitigated by adding a second left turn lane to both the east and west approaches. This improvement would reduce the average delay for vehicular traffic to acceptable levels (LOS E for expressway intersections) during the PM peak hour. The project applicant will pay a fair share contribution to the City towards their construction of the additional turn lane.
- San Tomas Expressway and El Camino Real: The significant impact at this intersection would be satisfactorily mitigated by the addition of a second eastbound left-turn lane on El Camino Real. This improvement was identified by the City as part of their Capital Improvement Program (June 08). The project applicant will pay a fair share contribution to the City towards their construction of the additional turn lane. This improvement would reduce the average delay for vehicular traffic to an acceptable level (LOS E) during both the AM and PM peak hours.
- San Tomas Expressway and Benton Street: This intersection's LOS would be improved by adding a fourth through lane to both the north and south approaches. The Comprehensive County Expressway Planning Study identifies the widening of San Tomas Expressway to eight lanes as a Tier 1A priority. This improvement would reduce the average delay for vehicular traffic to an acceptable level (LOS D) during the AM peak hour. The project applicant will pay a fair share contribution to the City towards the County's construction of the additional lanes.
- San Tomas Expressway and Homestead Road: The significant impact at this intersection would be satisfactorily mitigated by adding a fourth through lane to both the north and south approaches. This improvement was identified as a Tier 1A priority in the Comprehensive County Expressway Planning Study. With the improvement, the intersection would operate at an acceptable level (LOS D) during the AM peak hour. The project applicant will pay a fair share contribution to the City towards the County's construction of the additional lanes.