

CHAPTER 2

Executive Summary

2.1 Introduction

As provided by Section 15123 of the California Environmental Quality Act (CEQA) Guidelines (CEQA *Guidelines*), this chapter provides a brief summary of the proposed project, which includes a Housing Element Update (HEU) and Stanford Community Plan (SCP) Update to the Santa Clara County General Plan, and related rezonings, and the environmental consequences of the proposed project. This chapter is intended to summarize in a stand-alone section the proposed project as described in more detail in Chapter 3 (*Project Description*), the impacts and mitigation measures discussed in the various subsections of Chapter 4 (*Environmental Setting, Impacts, and Mitigation Measures*), and the alternatives analysis presented in Chapter 5 (*Alternatives*).

This Environmental impact Report (EIR) has been prepared to evaluate the anticipated environmental effects of the project in conformance with the provisions of CEQA and the CEQA *Guidelines*. The lead agency, the County of Santa Clara, is the public agency that has the principal responsibility for approving the HEU, the SCP update, and related rezonings (collectively, the “project”).

This EIR is a Program EIR, as provided for in CEQA Guidelines Section 15168. Section 15168(a) of the CEQA Guidelines states that a Program EIR is appropriate for projects which are “... a series of actions that can be characterized as one large project and are related either:

1. Geographically;
2. A logical part in the chain of contemplated actions;
3. In connection with issuance of rules, regulations, plans or other general criteria to govern the conduct of a continuing program; or
4. As individual activities carried out under the same authorizing statutory or regulating authority and having generally similar environmental effects which can be mitigated in similar ways.”

Section 15168(b) of the CEQA Guidelines further states: “Use of a Program EIR can provide the following advantages. The Program EIR can:

1. Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action;
2. Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis;

3. Avoid duplicate consideration of basic policy considerations;
4. Allow the Lead Agency to consider broad policy alternative and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts; and
5. Allow reduction in paperwork.”

Future discretionary actions that would be facilitated by the project’s approval, particularly those related to the development of housing, may require additional assessment to determine consistency with the analysis provided in this Program EIR. Potential future actions would also be subject to the mitigation measures established in this Program EIR unless superseded by a subsequent environmental document that may be required to analyze significant environmental impacts not foreseen in this Program EIR.

2.2 Regional Location and Project Area

2.2.1 Regional Setting

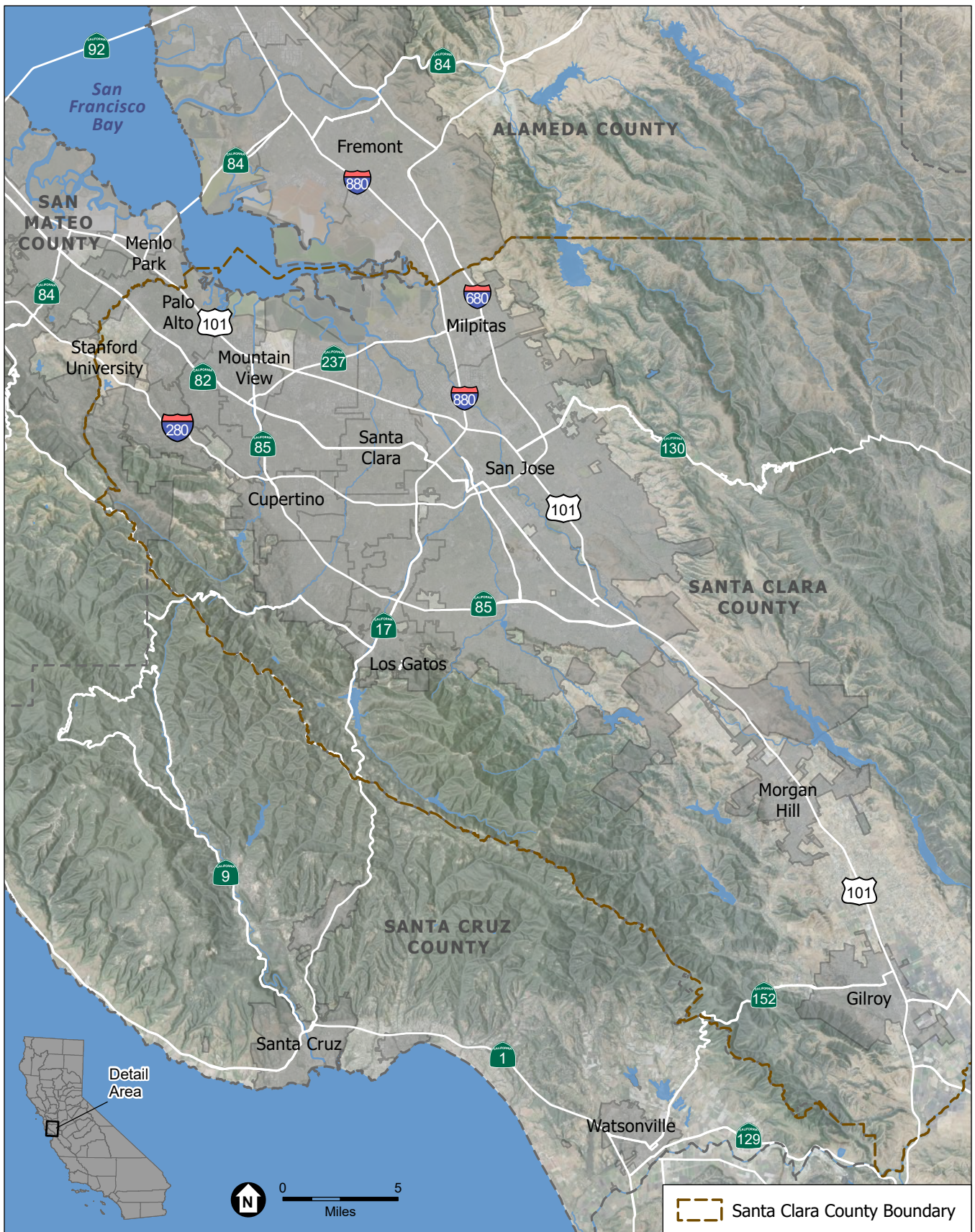
Santa Clara County is in the San Francisco Bay Area and encompasses 1,300 square miles. The County is located at the southern end of San Francisco Bay and is the Bay Area’s most populous county, with 15 cities and nearly two million people. The present urban and rural landscape of Santa Clara County is diverse, comprising a complex social and economic setting that overlays a rich historic, multi-cultural, and natural environment. In the early 20th century, the area was promoted as the "Valley of the Heart's Delight" due to its natural beauty, including a significant number of orchards. In 1939, the first major technology company to be based in the area was founded. Today, the County is headquarters to approximately 6,000 technology companies, some of which are the largest technology companies in the world.

While most of the urbanized areas in Santa Clara County are under the jurisdiction of individual cities, the County maintains land use jurisdiction over 607,418 acres. This includes 7,348 acres that are within designated Urban Service Areas (USAs) and are planned for eventual annexation to a city’s jurisdiction. Lands owned by Stanford University and subject to the County’s SCP comprise slightly over 4,000 acres. The remaining 596,070 acres of the unincorporated areas comprise rural parts of the County.

2.2.2 Project Site

Housing Element Update

The HEU would identify specific sites appropriate for the development of additional multifamily housing, and the County would rezone those areas as necessary to meet the requirements of State law. The various housing opportunity sites and land use strategy sites that have been identified as having the potential to accommodate development of multifamily housing are located in various locations within unincorporated County “islands” within the City of San José, and also on the Stanford University campus. The project’s regional location is shown in **Figure 2-1**.



SOURCE: Esri, 2022; County of Santa Clara, 2022; ESA, 2022

Santa Clara County Housing Element Update Environmental Impact Report

Figure 2-1
Regional Location Map

Stanford Community Plan Update

The project would also update the existing SCP, which was adopted in 2000 and most recently amended in 2015. Development on the Stanford campus is currently regulated under the Santa Clara County General Plan, including the SCP, Stanford’s 2000 General Use Permit (GUP) conditions of approval, the County of Santa Clara Ordinance Code, and the 1985 Land Use Policy Agreement (Agreement) between the County of Santa Clara, the City of Palo Alto, and Stanford University.

2.3 Project Background

2.3.1 Purpose of the Housing Element Update

State law requires the County to have and maintain a General Plan with specific contents to provide a vision for the County’s growth and to inform local decisions on land use and development, including issues such as circulation, conservation, and safety.

State law (Government Code Section 65588) requires the County to update the Housing Element every eight years, while making any changes to other components of the General Plan needed to maintain internal consistency and comply with State law, as well as undertaking related changes to the County’s Zoning Ordinance. The County’s current Housing Element was last updated in 2015 and covers the “fifth cycle” planning period from 2014 through 2022. In accordance with State law, the planning period for the “sixth cycle” updated Housing Element will cover 2023 through 2031.

Concurrent with the Housing Element update, the County will amend the land use designations for the housing opportunity sites and make other conforming amendments to other components of the General Plan to maintain internal consistency with the HEU and SCP.

Regional Housing Needs Allocation

In addition to including goals, policies, and implementation programs regarding housing issues, housing elements must include an inventory or list of housing sites at sufficient densities to accommodate a specific number of units at various levels of affordability assigned to the County by the Association of Bay Area Governments (ABAG). This assignment is referred to as the County’s Regional Housing Needs Allocation (RHNA).

On December 18, 2020, ABAG released its *Draft Regional Housing Needs Assessment Methodology and Subregional Shares* document which articulated ABAG’s recommended methodology for the distribution of the regional housing need of 441,176 housing units issued by the State Department of Housing and Community Development (HCD). Based on the draft methodology, the County was assigned 3,125 units to be planned within unincorporated Santa Clara County for the term of the planning period from 2023 through 2031 (“6th Cycle”). This assignment represents an increase of 1,028 percent from the last RHNA cycle.

ABAG adopted the Final RHNA on December 16, 2021. **Table 2-1** shows the breakdown of required units in unincorporated Santa Clara County across the four State-monitored income categories. The County’s RHNA assignment must be addressed in the HEU.

To accommodate the new units, the County will have to rezone the identified housing opportunity sites. This EIR evaluates the impacts of amendments to the County Zoning Ordinance necessary to implement the HEU. The proposed Zoning Ordinance amendments would rezone most or all parcels listed in the HEU site inventory with a minimum density of dwelling units consistent with the number of units shown in Table 3-2 in chapter 3 of this EIR, and additional zoning provisions to incentivize the development of affordable housing.

TABLE 2-1
COUNTY OF SANTA CLARA 2023-2031 RHNA ALLOCATIONS BY INCOME CATEGORY^a

Income Group				Total
Very Low Income (VLI)	Low Income (LI)	Moderate Income (MOD)	>Moderate Income (>MOD)	
828	477	508	1,312	3,125

NOTES:

a Household income categories are based on those established by the U.S. Department of Housing and Urban Development for use in its Section 8 Housing Choice Voucher Program. The 2022 Area Median Income (AMI) for Santa Clara County is \$168,500 for a family of four. Very Low Income households have an income less than 50% of AMI (<\$84,250) and a portion of Very Low income households qualify as Extremely Low Income, with income less than 30% of AMI (<\$50,550). Low Income households have an income less than 80% of AMI (<\$131,750). Moderate Income households have an income less than 120% of AMI (<\$202,200). Above Moderate Income households have an income over 120% of AMI (>\$202,200).

SOURCES:

Association of Bay Area Governments, *Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031*, Adopted December 16, 2021.

Department of Housing and Community Development. 2022. *State Income Limits for 2022*. May 13, 2022.

In addition to the RHNA assignment noted above, the HEU must also include a housing unit “buffer” to ensure that if one or more of the identified housing sites are developed at lower densities than projected, with non-housing uses, or not developed at all, there will be remaining capacity elsewhere in the unincorporated area to provide an ongoing supply of sites for housing during the eight-year planning period/cycle of the Housing Element.

The need for the HEU to include a substantial buffer is increasingly important because of new rules in the Housing Accountability Act’s “no net loss” provisions. California State Senate Bill 166 (2017), codified in Government Code section 65589.5, requires that the land inventory and site identification programs in the Housing Element include sufficient sites to accommodate unmet RHNA. This means that if a housing site is identified in the Housing Element as having the potential for housing development that could accommodate lower-income units but is actually developed with units at a higher income level, with fewer units than expected, or with non-residential uses, then the locality must either: 1) identify and rezone, if necessary, an adequate substitute site; or 2) demonstrate that the land inventory already contains an adequate substitute site.

An adequate buffer will ensure that the County remains compliant with these provisions without having to identify and rezone sites prior to the end of the planning period on January 31, 2031.

While State law requires the County to include an inventory of housing sites and have appropriate zoning to facilitate multifamily housing on those sites, the County is not required to develop housing on these sites. Future development on the identified sites will be up to the property owners and will be largely dependent on market forces and (in the case of affordable housing) available subsidies and other incentives. Nonetheless, this EIR considers potential impacts of development that may result from adoption of the HEU, including rezoning of potential housing sites to allow housing and/or mixed-use developments, and related actions to encourage housing production including, but not limited to, changes in allowable densities, changes in development standards, and adoption of incentives such as a density bonus for the creation of affordable housing.

2.3.2 Purpose of the Stanford University Community Plan Update

Stanford land-grant lands within unincorporated Santa Clara County that are used for academic and academic support uses fall within the SCP area and are therefore subject to policies in the SCP, as adopted by the Board of Supervisors (Board) in 2000, and most recently amended in 2015. Development within the SCP area is currently regulated under the Santa Clara County General Plan, including the SCP, Stanford's 2000 General Use Permit (GUP), the Santa Clara County Ordinance Code, and the 1985 Land Use Policy Agreement (Agreement) between the County of Santa Clara, the City of Palo Alto, and Stanford University.

At the direction of the Board (February 11, 2020, Item No. 19), and as the first phase of planned work to update the County General Plan, the Administration is also proposing updates to the SCP (SCP update).

Prior updates to the SCP were proposed by the Administration and considered by the Board in tandem with the proposed adoption of a new GUP applied for by Stanford in Fall 2016. However, the 2016 GUP application was withdrawn by Stanford University on November 1, 2019, and those SCP updates were not adopted by the Board. On February 11, 2020, the Board approved recommending the Administration move forward with specified items related to updating the SCP.

Three of the unincorporated sites identified in the HEU as appropriate and likely locations for residential development within the 2023-2031 planning period are within the SCP area. In addition, a potential future school location on the Stanford campus was identified in the current SCP. The updated SCP would relocate that potential future school location to the West Campus Development district in the northerly portion of the campus to be closer to the proposed HEU housing opportunity sites. Based upon these considerations, an update to the SCP is also proposed as part of this Project and included in this EIR.

This integrated approach will result in Stanford University providing the housing needed to accommodate future growth of academic and academic-support uses directly on campus or other

contiguous Stanford land-grant lands. This approach also expands the previous Stanford-housed population from “students and faculty” to “undergraduate students, graduate students, faculty, staff, postgraduate fellows, and other workers.” The call to provide all needed housing to accommodate future development on campus and enhance the coordination between housing policies and transportation policies will facilitate a reduction in vehicle miles traveled (VMT), as well as reductions of other negative impacts associated with commuting and local trips.

2.4 Project Description

The proposed Project would make updates to the County’s General Plan to comply with State law, reflect current conditions, and prepare for future anticipated growth of the County, including updates to the General Plan’s Housing Element, the SCP, and related rezonings of the housing opportunity sites. Collectively, these actions comprise the “project” evaluated in the EIR.

2.4.1 Housing Element Update

The proposed HEU would adopt an updated Housing Element for the sixth cycle planning period of 2023 through 2031, in accordance with State law. The updated Housing Element would include goals, objectives, policies, and implementation programs that address the maintenance, preservation, improvement, and development of housing in unincorporated Santa Clara County. In addition, the HEU would identify sites appropriate for the development of multifamily housing, and the County would rezone those sites as necessary to meet the requirements of State law. The County proposes to create an overlay zone based on the identification of High Opportunity Areas for affordable housing and access to amenities and services.¹

The HEU would further the County’s fundamental policies regarding growth management and the accommodation of urban development within cities’ USAs (i.e., areas planned for urbanization). Outside of cities’ USAs, only non-urban uses and development densities are allowed, with the goal of preserving natural resources and agricultural lands and minimizing population exposure to significant natural hazards such as landslides, earthquake faults, and wildfire. The Countywide growth management policies have historically been referred to as the “joint urban development policies,” held in common by the cities, County, and the Santa Clara County Local Agency Formation Commission (LAFCO), which controls city formation and expansion.

Keeping in mind the development principles and statutory requirements above, the proposed HEU identifies specific sites appropriate for the development of additional housing sufficient to meet the County’s RHNA and provide an ample buffer. As appropriate, the County would rezone those areas as necessary to meet the requirements of State law and make changes to the County’s zoning map and Zoning Ordinance.

Because the County’s 6th Cycle RHNA assignment increased dramatically from past cycles, the County has been compelled to consider a wider range of sites than it has in the past. The County’s

¹ The Draft HEU can be viewed at the following location: <https://plandev.sccgov.org/ordinances-codes/general-plan/housing-element-update-2023-2031>.

sites identified for the 6th Cycle are located either: (1) within urban unincorporated “islands” that are surrounded entirely by the City of San José, or (2) on the Stanford University campus. This strategy is consistent with the County’s General Plan and the County’s longstanding commitment to concentrate development in urban areas, where development can benefit from urban services and infrastructure.

The San José sites have long been intended for annexation to San José, and historically the County’s General Plan has left the planning for these areas to the City of San José and its General Plan. The County has identified several sites that are in the City’s USA that have remained unincorporated and undeveloped for decades, including some sites the City identified for past RHNA cycles. In observance of the County’s disproportionately high RHNA assignment, the City has not selected any of the unincorporated sites for its 6th Cycle site inventory. The County is therefore including such sites in its HEU site inventory, along with proposing the requisite changes to the County’s General Plan. The County is also re-listing sites on the Stanford Campus that it identified for RHNA in the past. **Table 2-2** lists all the potential sites identified by the County and their proposed development densities, and the various subfigures presented as **Figure 2-2** show their locations.

2.4.2 Stanford University Community Plan Update

The SCP update recommends a coordinated approach to housing and circulation policy and implementation measures. This approach will result in Stanford University providing the housing needed to accommodate future growth of academic and academic support uses directly on campus or other contiguous Stanford land-grant lands. This approach also expands the previous housed population from “students and faculty” to “undergraduate students, graduate students, faculty, staff, postgraduate fellows, and other workers.” The call to provide all needed housing to accommodate future development on campus and enhance the coordination between housing policies and transportation policies will facilitate a reduction in VMT, as well as other negative impacts associated with commuting and local trips.²

² The Draft SCP update can be viewed online at: <https://plandev.sccgov.org/policies-plans-and-documents>, and also at <https://stanfordcommunityplanupdate.org/>

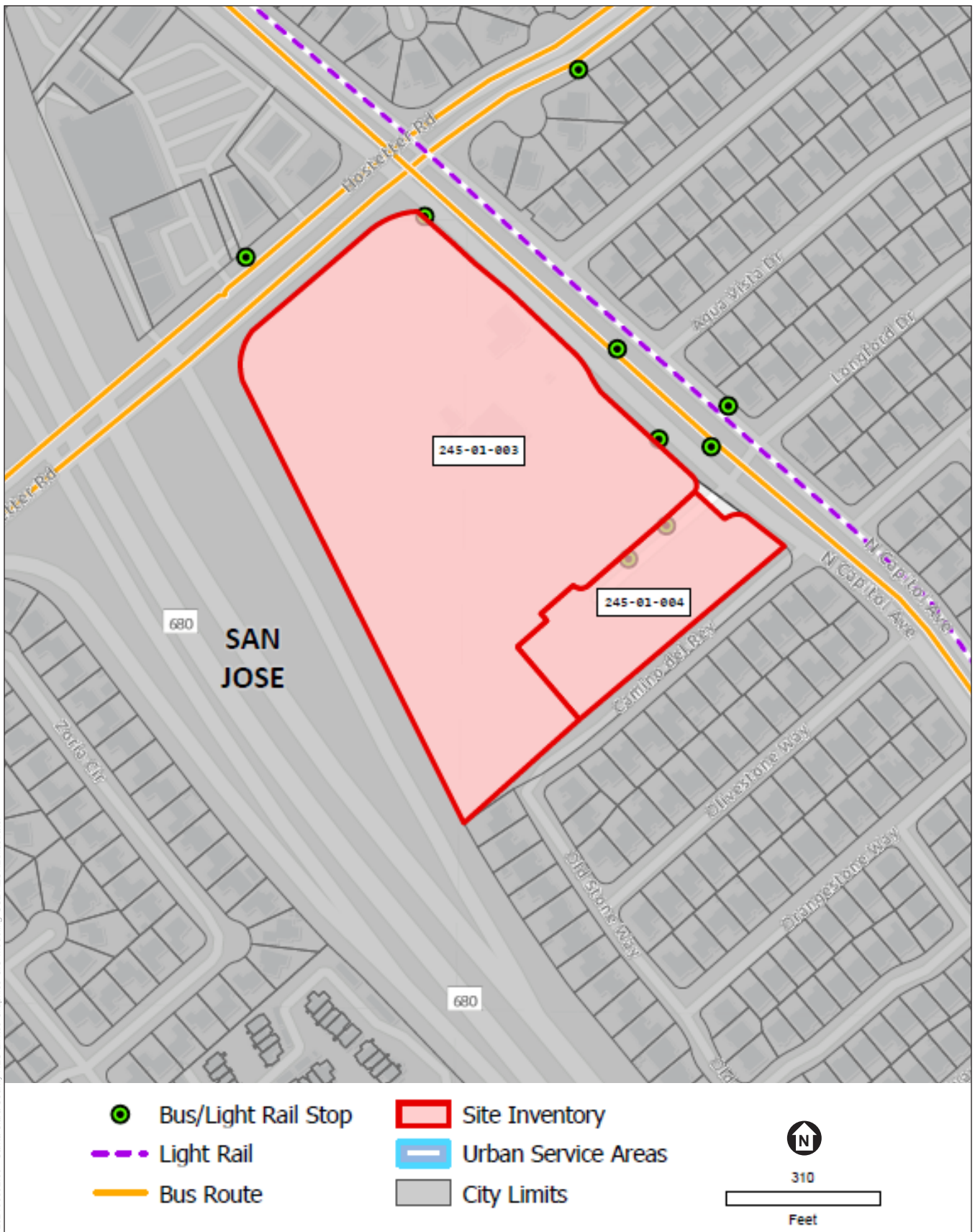
**TABLE 2-2
HOUSING OPPORTUNITY SITES INVENTORY**

APN	Size (acres)	Urban/Rural	Potential Density (du/ac)		Potential Units		Existing Zoning	Existing General Plan	Site/Area Name
			Low	High	Low	High			
245-01-003	13	Urban (San José)	80	100	1,040.0	1,300.0	A - Agricultural	Neighborhood/Community Commercial (San José)	Hostetter Station
245-01-004	2.3	Urban (San José)	80	100	186.0	232.0	A - Agricultural	Neighborhood/Community Commercial (San José) Unplanned Urban Village	Hostetter Station
277-06-025	0.4	Urban (San José)	60	100	22.0	36.0	R1-n2 – Residential (Burbank)	Mixed Use Commercial/West San Carlos Urban Village	Parkmoor/Burbank Neighborhood
277-07-027	0.1	Urban (San José)	40	80	4.0	7.0	CG - General Commercial	Urban Village/West San Carlos Urban Village	Parkmoor/Burbank Neighborhood
277-07-028	0.1	Urban (San José)	40	80	4.0	7.0	CG - General Commercial	Urban Village/West San Carlos Urban Village	Parkmoor/Burbank Neighborhood
277-07-029	0.2	Urban (San José)	40	80	7.0	14.0	CG - General Commercial	Urban Village/West San Carlos Urban Village	Parkmoor/Burbank Neighborhood
277-08-029	0.1	Urban (San José)	40	80	4.0	7.0	CG - General Commercial	Urban Village/West San Carlos Urban Village	Parkmoor/Burbank Neighborhood
277-08-030	0.1	Urban (San José)	40	80	4.0	7.0	CG - General Commercial	Urban Village/West San Carlos Urban Village	Parkmoor/Burbank Neighborhood
277-08-031	0.2	Urban (San José)	40	80	7.0	14.0	CG - General Commercial	Urban Village/West San Carlos Urban Village	Parkmoor/Burbank Neighborhood
277-12-027	0.3	Urban (San José)	40	80	12.0	25.0	CG - General Commercial	Urban Village/West San Carlos Urban Village	Parkmoor/Burbank Neighborhood
277-12-029	0.3	Urban (San José)	40	80	12.0	25.0	CG - General Commercial	Urban Village/West San Carlos Urban Village	Parkmoor/Burbank Neighborhood
282-02-037	1.5	Urban (San José)	60	100	90.0	150.0	CN - Neighborhood Commercial	Neighborhood/Community Commercial (San José)	Fruitdale/Santa Clara Valley Medical Center
282-03-016	3.5	Urban (San José)	60	100	210.0	350.0	R1-8 - SF Housing	Public Quasi-Public (San José)	Fruitdale/Santa Clara Valley Medical Center
419-12-044	0.8	Urban (San José)	10	20	8.0	16.0	CN - Neighborhood Commercial	Neighborhood/Community Commercial (San José) Unplanned Urban Village	Cambrian Park

**TABLE 2-2 (CONTINUED)
HOUSING OPPORTUNITY SITES INVENTORY**

APN	Size (acres)	Urban/Rural	Potential Density (du/ac)		Potential Units		Existing Zoning	Existing General Plan	Site/Area Name
			Low	High	Low	High			
599-01-064	0.7	Urban (San José)	20	30	15.0	22.0	CN - Neighborhood Commercial	Neighborhood/Community Commercial (San José) Unplanned Urban Village	Alum Rock/East Foothills
599-39-047	0.6	Urban (San José)	40	80	22.0	45.0	CN - Neighborhood Commercial	Neighborhood/Community Commercial (San José) Unplanned Urban Village	Alum Rock/East Foothills
601-07-066	1.5	Urban (San José)	5	8	7.0	12.0	R1 - SF Housing	Residential Neighborhood (San José)	Alum Rock/East Foothills
601-25-119	1.9	Urban (San José)	5	8	10.0	15.0	R1 - SF Housing	Public Quasi-Public (San José)	Alum Rock/East Foothills
612-21-004	0.8	Urban (San José)	5	8	4.0	7.0	R1-6 - SF Housing	Residential Neighborhood (San José)	Alum Rock/East Foothills
649-24-013	43.5	Urban (San José)	25	35	1,088.0	1,523.0	A – Agricultural	Private Recreation and Open Space	Pleasant Hills
649-23-001	70.5	Urban (San José)	25	35	1,762.0	2,467.0	A – Agricultural	Private Recreation and Open Space	Pleasant Hills
142-04-036	40	Urban (Stanford)	17.5	22.5	700.0	900.0	A1 - General Use Special Purpose Base District	Major Educational & Institutional Uses (County)	Escondido Village
142-04-036a	8	Urban (Stanford)	70	90	560.0	720.0	A1 - General Use Special Purpose Base District	Major Educational & Institutional Uses (County)	Quarry Site A
142-04-036b	6	Urban (Stanford)	70	90	420.0	540.0	A1 - General Use Special Purpose Base District	Major Educational & Institutional Uses (County)	Quarry Site B

TOTAL UNITS	6,198	8,441.0
RHNA Allocation	3,125	
San José Sites	4,518	6,281
Stanford University Sites	1,680	2,160

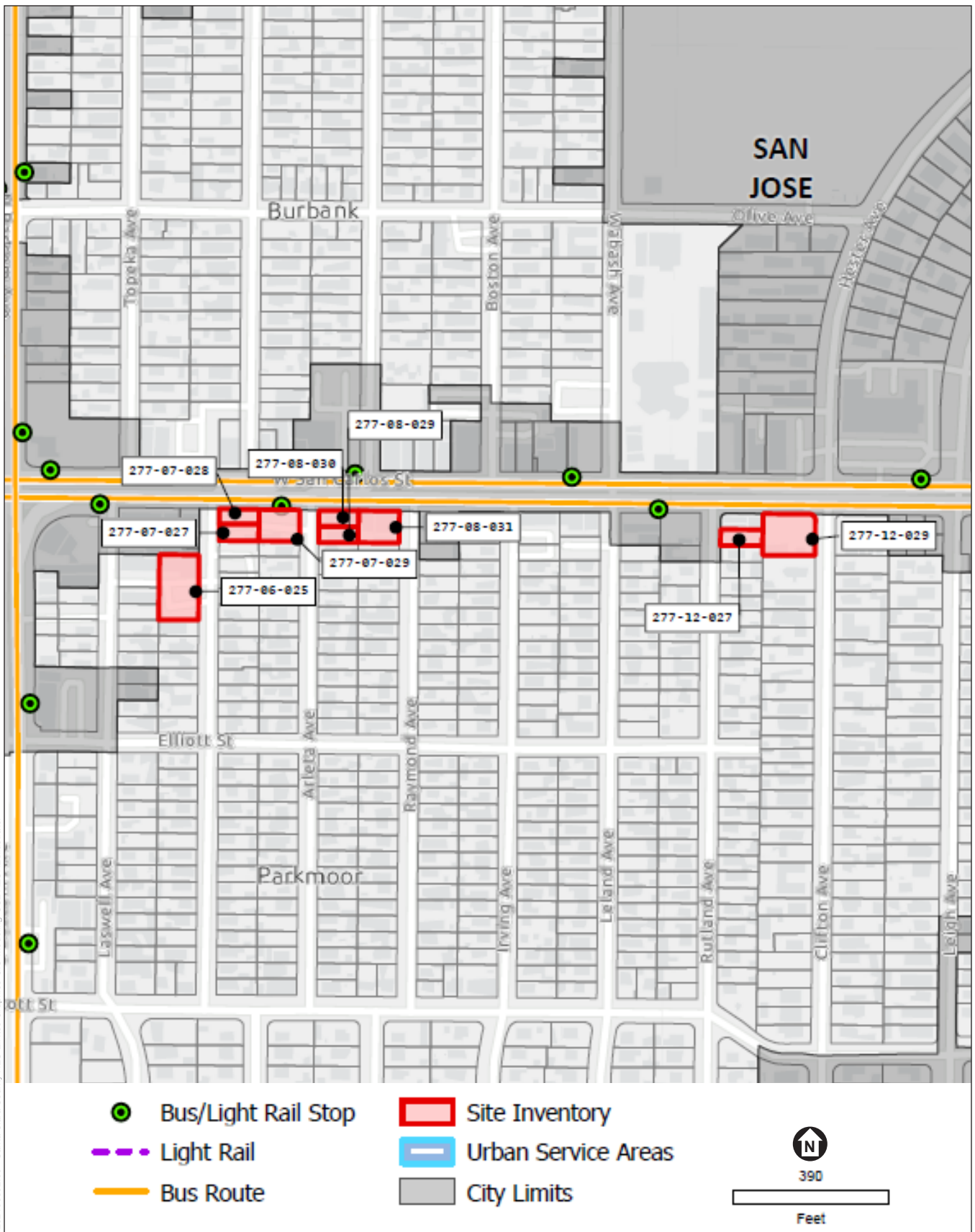


SOURCE: County of Santa Clara, 2023

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Figure 2-2a
Housing Opportunity Sites in San José – Hostetter Station Area





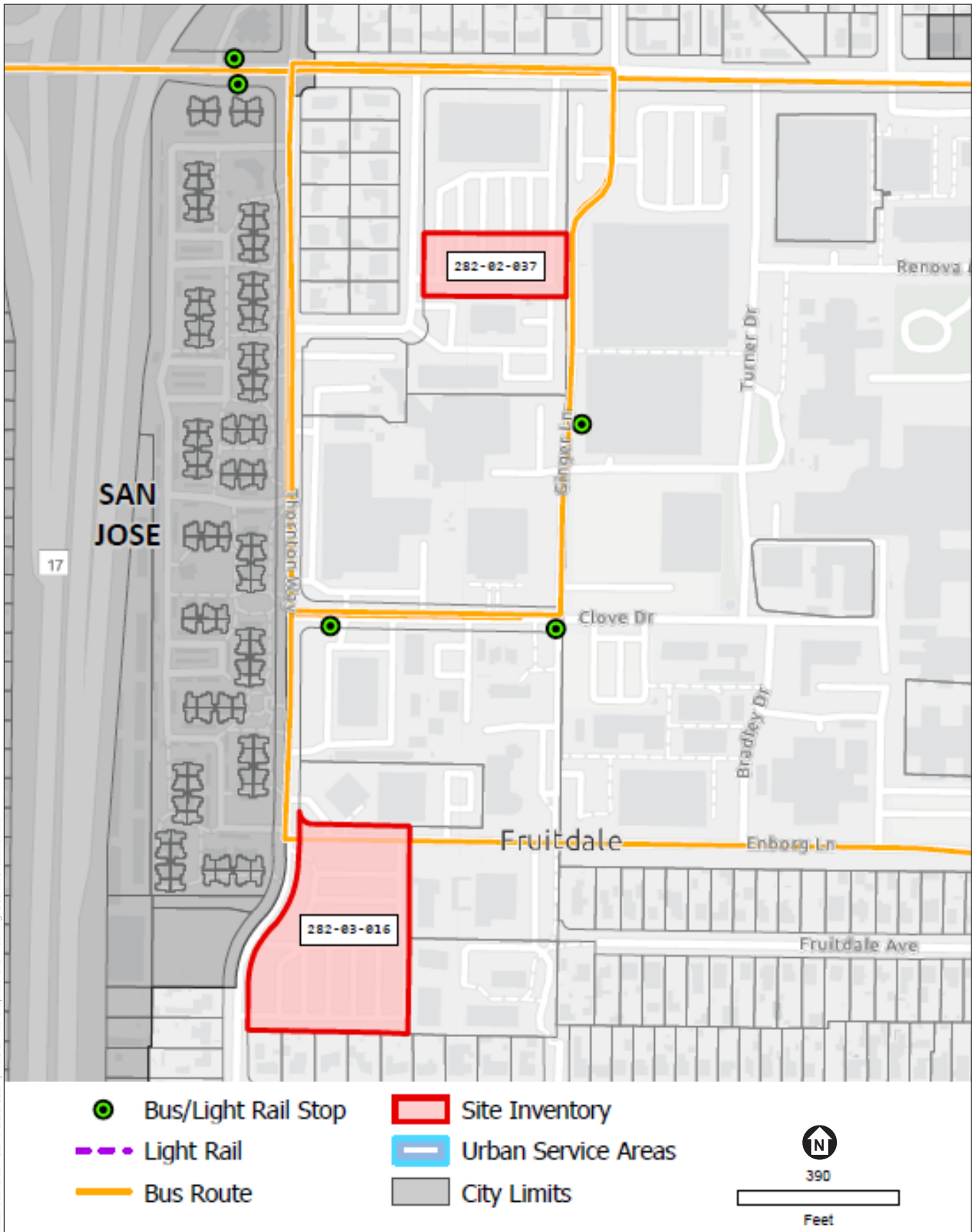
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SOURCE: County of Santa Clara, 2023

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Figure 2-2b
Housing Opportunity Sites in San José – Parkmoor/Burbank Neighborhood



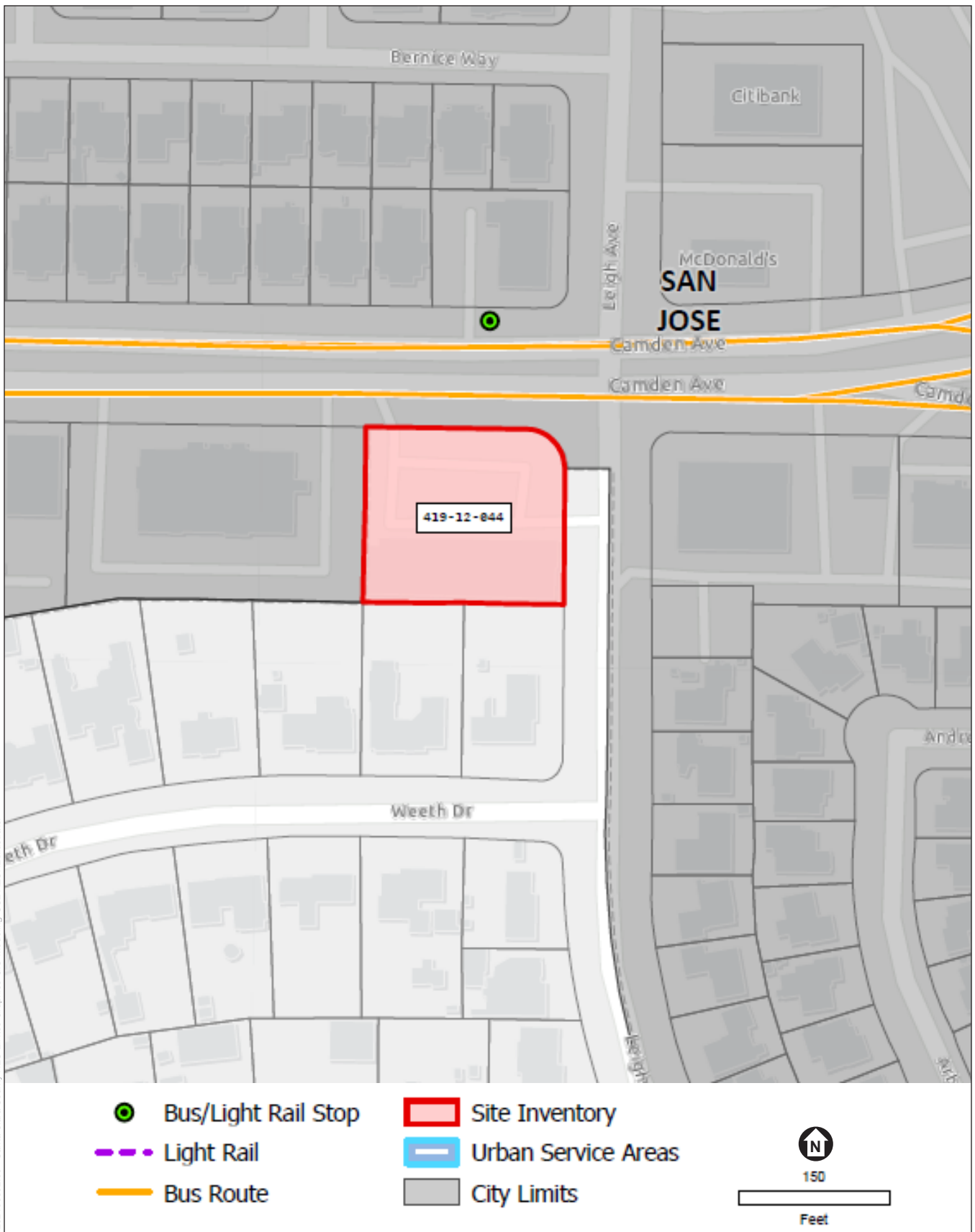


SOURCE: County of Santa Clara, 2023

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Figure 2-2c
Housing Opportunity Sites in San José – Fruitdale/Santa Clara Valley Medical Center





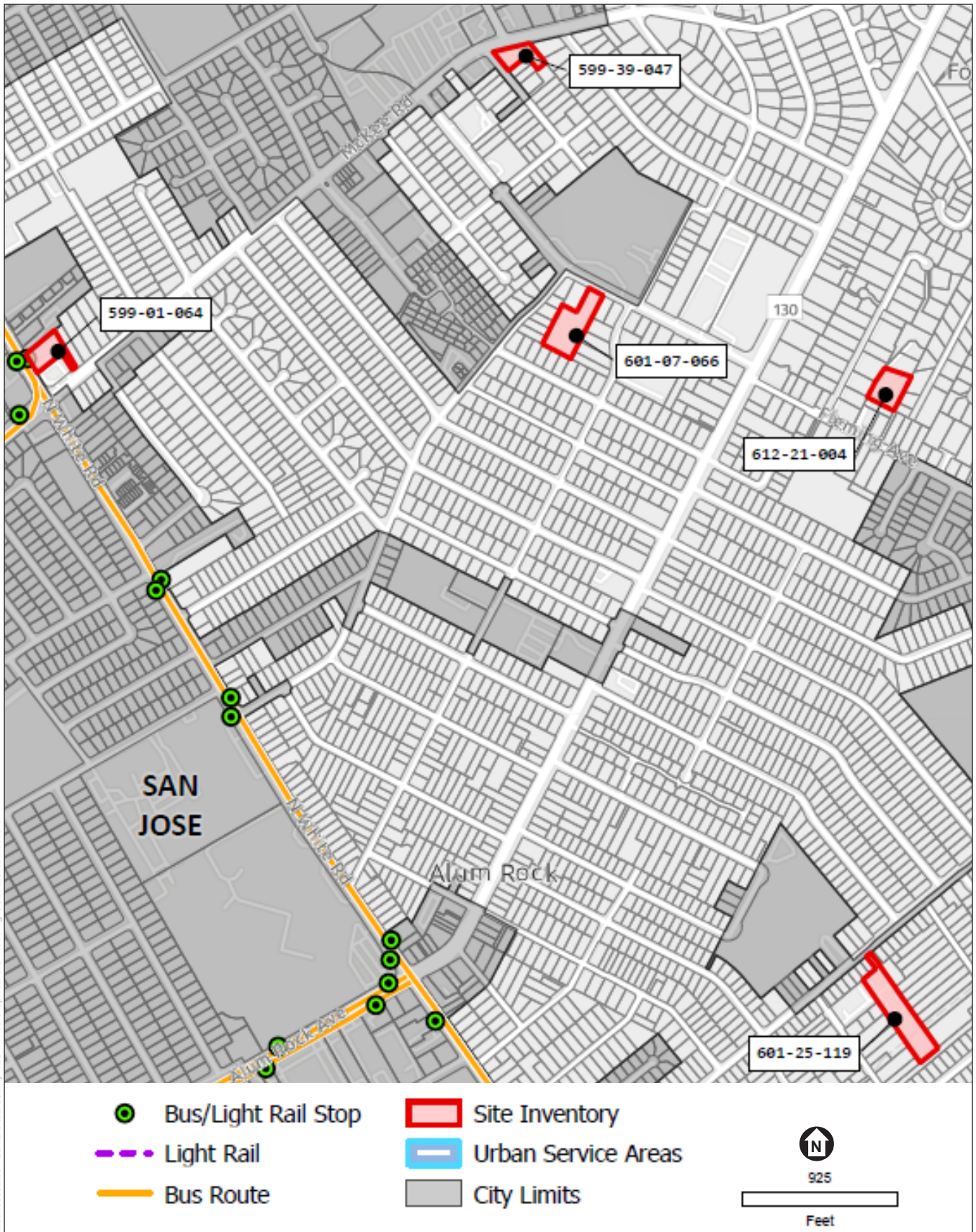
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SOURCE: County of Santa Clara, 2023

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Figure 2-2d
Housing Opportunity Sites in San José – Cambrian Park



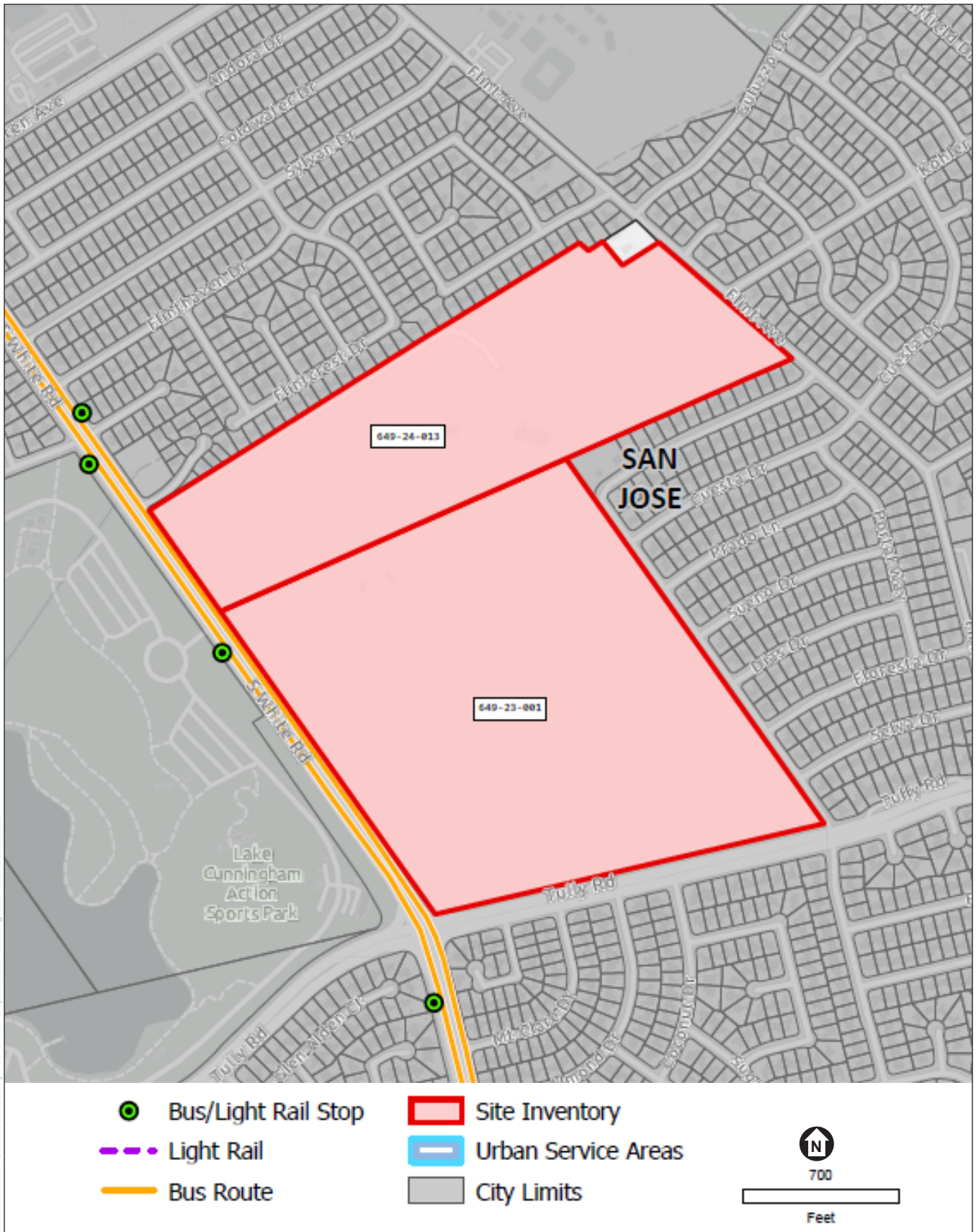


SOURCE: County of Santa Clara, 2023

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Figure 2-2e
Housing Opportunity Sites in San José – Alum Rock/East Foothills





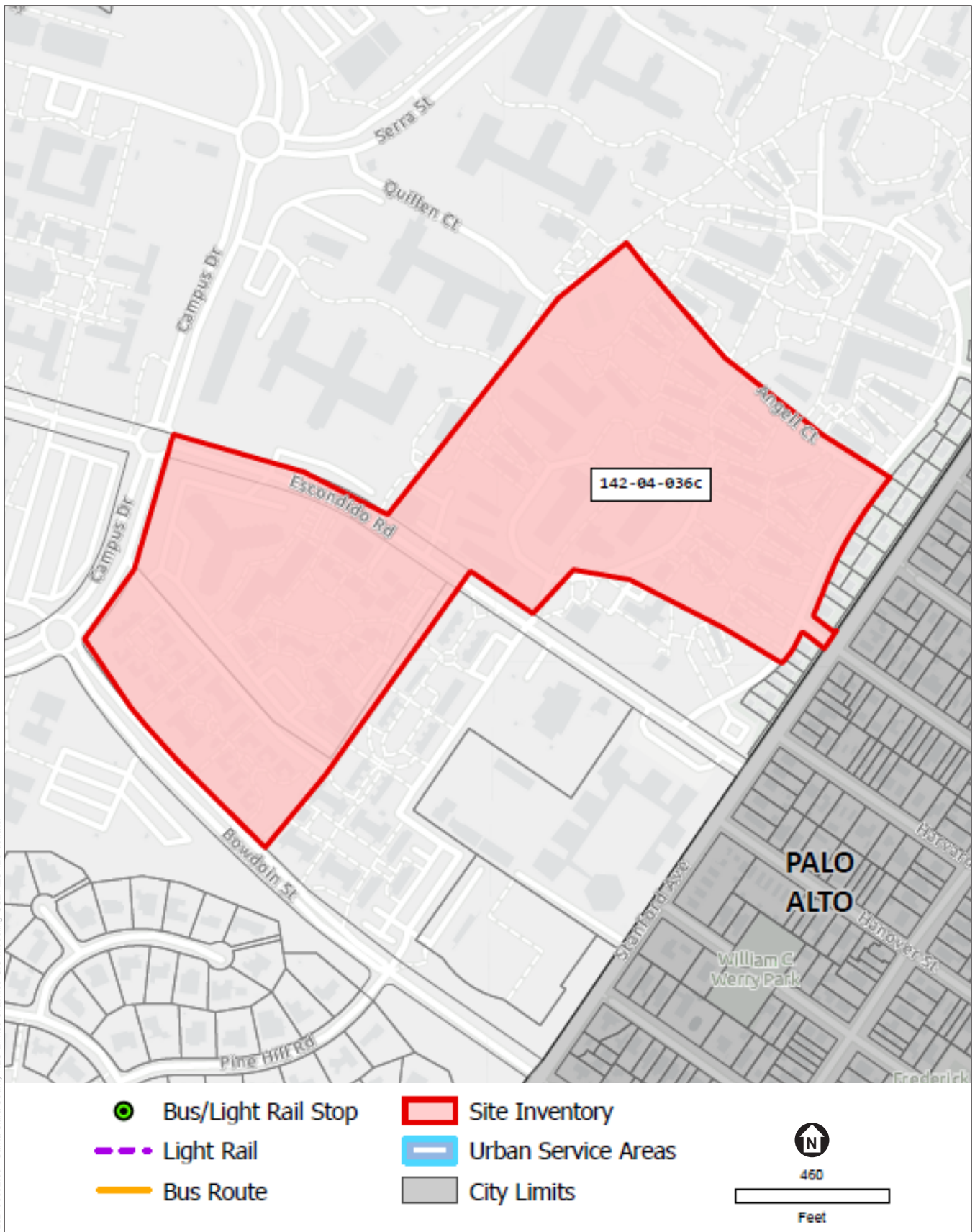
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SOURCE: County of Santa Clara, 2023

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Figure 2-2f
Housing Opportunity Sites in San José – Pleasant Hills





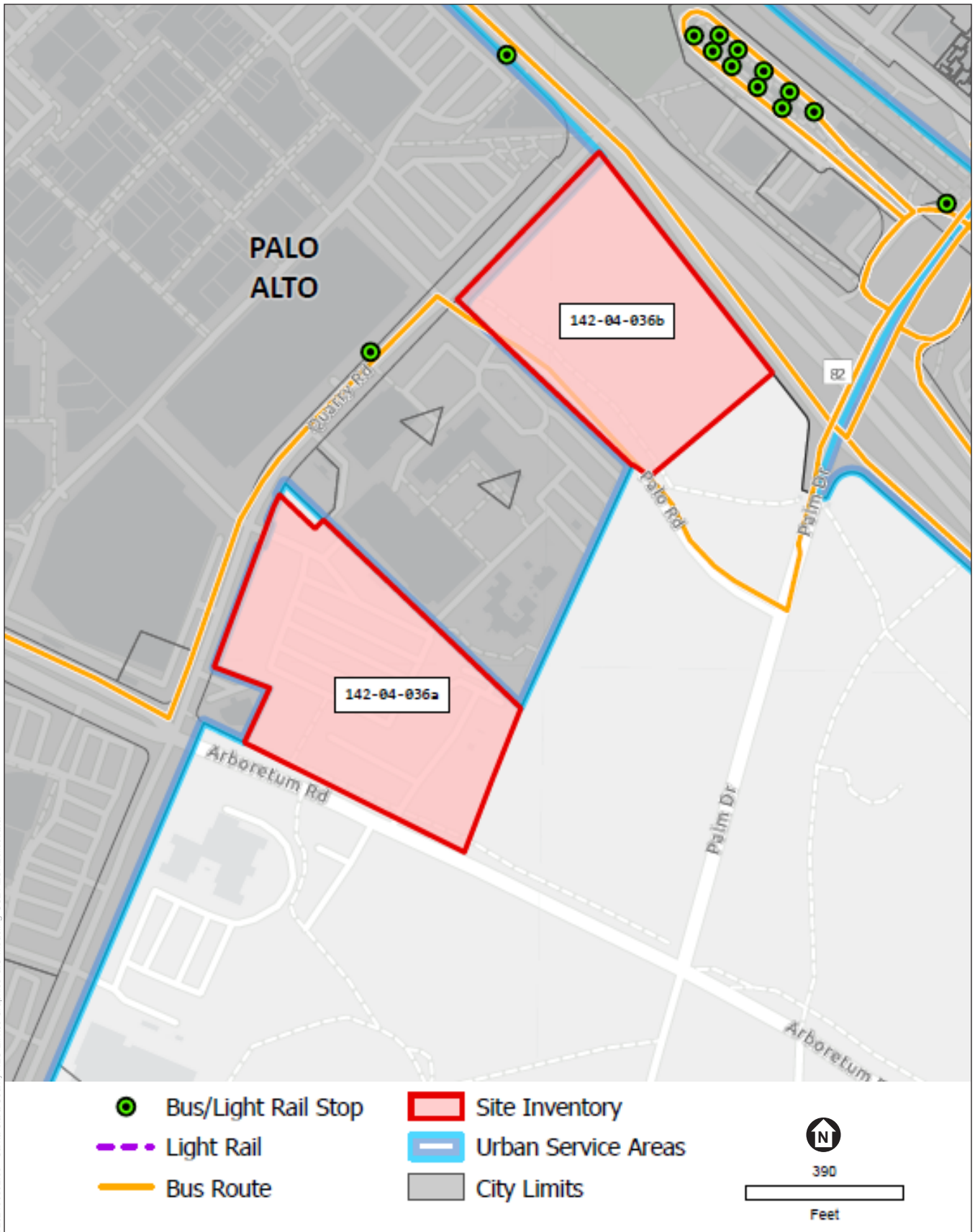
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SOURCE: County of Santa Clara, 2023

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Figure 2-2g
Housing Opportunity Sites on the Stanford University Campus – Escondido Village





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SOURCE: County of Santa Clara, 2023

Santa Clara County Housing Element Update Environmental Impact Report

Figure 2-2h
 Housing Opportunity Sites on the Stanford University Campus
 – Quarry Arboretum/EI Camino



The following list includes additional updates to the SCP organized by chapter:

Chapter 1: Growth and Development

- Extends the duration of the Academic Growth Boundary (AGB) for a period of 99 years and the set of factors required for consideration by the Board to reduce that timeframe.
- Provides new specifications for General Use Permit (GUP) application, review, and reporting standards. Includes limitation of future GUP approvals to a maximum of 10 years, with periodic progress reports as determined by future GUP conditions of approval. Provides reporting, reimbursement, and funding requirements for municipal and childcare services.

Chapter 2: Land Use

- Allows housing for faculty and staff to be developed within the Academic Campus land use designation at densities above 30 dwelling units per acre (du/ac).
- Requires that any increase in total academic space over the allowance in the existing SCP will require a Community Plan amendment and GUP modification. Includes a policy and implementation measure specifically for the characteristics of the Lathrop Development District.
- Supports the County to pursue a new zoning district for Campus Open Space that will be applied to the Arboretum area covered under the Campus Open Space land use designation.
- Requires Stanford to prepare and submit to the Board of Supervisors for approval, a study to document historic landscapes on campus.
- Relocates the “potential future school site” designation to the West Campus Development district, but not within the Stanford Golf Course.
- Promotes management of Special Conservation Areas in conformance with the Stanford University Special Conservation Area Plan approved by the County and the requirements of the Stanford University Habitat Conservation Plan approved by the U.S. Fish and Wildlife Service.

Chapter 3: Housing

- Requires a nexus study to determine the required amount of housing needed to accommodate future development, based on the income levels of anticipated employees.
- Prevents spillover of required housing into surrounding cities and require housing, both affordable and market rate, to be located on campus or on contiguous Stanford lands.
- Requires construction of affordable housing.
- Ministerially approve housing identified in previous and current Housing Elements as a designated opportunity site, based on objective standards. This includes Quarry-El Camino, Quarry-Arboretum, and Escondido Village, which are sites identified in the previous and proposed Housing Elements.
- Encourage financial assistance for housing for faculty, staff, postgraduate fellows, and other workers; a need demonstrated in the Graduate Student Housing Affordability Study.

Chapter 4: Circulation

- Modifies the SCP’s “no net new commute trips” and “reverse trips” performance standards to encourage the addition of transit-oriented housing.
- Establishes a system for direct, independent, and verifiable monitoring of Stanford’s level of achievement with the “no net new commute trips,” 3-hour peak period trips,” “reverse trips,” and Vehicle Miles Travelled (VMT) performance standards through the annual monitoring procedure.
- Expands the number of recipients that Stanford could fund for trip credits.
- Requires Stanford to provide a Special Event Management Plan, which includes traffic and parking, reviewed and approved by the County.
- Requires Stanford to provide advance public notification for special events on-campus that exceed specific thresholds.
- Requires centralized locations for the receipt of deliveries.

Chapter 5: Open Space

- Allows for a limited number of small, specialized facilities or installations that support permitted or existing activities outside of the Academic Growth Boundary (AGB).
- Acknowledges adoption of the Special Conservation Area land use designation and Stanford’s completion of and/or funding towards various trail projects.

Chapter 6: Resource Conservation

- Requires Stanford to prepare and update inventories, maps, records, and reports related to resource conservation.
- Acknowledges and includes references to Stanford’s Habitat Conservation Plan, a groundwater recharge study, the San Juan Residential District Survey, and other active requirements in the County.

Chapter 7: Health and Safety

- Includes the addition of new strategies related to social, mental and emotional health, as well as climate change and climate adaptation. These policies and implementation plans are adapted from the Health Element of the Santa Clara County General Plan, adopted by the Board of Supervisors in 2015.

2.5 Project Objectives

CEQA Guidelines Section 15124(b) requires the description of the project in an EIR to state the objectives sought by the project.

“A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project.”

In keeping with this requirement, the County’s project objectives are as follows:

- Update the General Plan’s Housing Element to comply with State-mandated housing requirements and to address the maintenance, preservation, improvement, and development of housing in the County between 2023 and 2031.
- Include an inventory of housing sites in the Housing Element and rezone those sites as necessary to meet the required Regional Housing Needs Allocation and to provide an appropriate buffer for achieving the RHNA.
- To affirmatively further fair housing (AFFH). In particular, to integrate AFFH into the process of site selection, outreach and policy/program development.
- Incentivize the development of housing, particularly affordable housing, suited to special needs and all income levels.
- Amend land use designations in the County’s General Plan as needed to maintain internal consistency between the elements and comply with recent changes in State law.
- Make necessary General Plan amendments and zoning changes in a manner that affirmatively furthers fair housing while preserving the character of Santa Clara County and perpetuating the health, safety and welfare of both existing and future residents.
- Update the Stanford Community Plan policies to, among other things, incentivize the production of adequate and affordable housing, address transportation/circulation issues, establish parameters for future General Use Permit approvals, ensure provision of adequate municipal services; and relocate a potential future public school site.

2.6 Identified Significant Impacts

As provided by the CEQA *Guidelines* Section 15123(b)(1), an EIR must provide a summary of the impacts, mitigation measures and significant impacts after mitigation for a proposed project. This information is presented in the various subsections within Chapter 4, *Environmental Setting, Impacts, and Mitigation Measures*, of this EIR, and summarized in **Table 2-3** at the end of this chapter. The proposed project would result in the following significant and unavoidable impacts:

Impact AQ-3: Construction and operation of individual development projects following adoption of the project could result in a cumulatively considerable net increase in criteria pollutants for which the region is in nonattainment status under an applicable federal, state, or regional ambient air quality standard. (*Significant and Unavoidable Impact, with Mitigation*)

Impact CR-1: Implementation of the project could cause a substantial adverse change in the significance of an historical resource pursuant to CEQA Guidelines Section 15064.5. (*Significant and Unavoidable Impact, with Mitigation*)

Impact CR-4: Implementation of the project, in combination with other cumulative development, could cause a substantial adverse change in the significance of historical resources pursuant to CEQA Guidelines Section 15064.5. (*Significant and Unavoidable Impact, with Mitigation*)

Impact NOI-1: Construction activities associated with implementation of the proposed project would not result in generation of a substantial temporary increase in ambient noise

levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (*Significant and Unavoidable Impact, with Mitigation*)

Impact TRA-2: Implementation of the project would exceed an applicable VMT threshold of significance (*Significant and Unavoidable Impact, with Mitigation*)

Impact TRA-6: Implementation of the project, in combination with cumulative development, would exceed an applicable VMT threshold of significance (Significant and Unavoidable Impact, with Mitigation)

2.7 Alternatives to the Proposed Project

Chapter 5, Alternatives, analyzes a range of reasonable alternatives to the proposed project, including the No Project Alternative (Alternative 1), and the Lesser Intensity Alternative (Alternative 2).

The analysis of the alternatives is summarized and compared in **Chapter 5**, which provides a summary of impact levels within all environmental topic areas. Overall, the analysis shows that the Lesser Intensity Alternative would reduce some of the project's significant impacts.

Based on the evaluation described in Chapter 5, the No Project Alternative and the Lesser Intensity Alternative would both be environmentally superior to the proposed project, though the No Project Alternative could result in the need to develop housing further from employment centers in the County and could thus contribute to greater impacts related to air quality, GHG emissions, and VMT. Regardless, the No Project Alternative would not meet any of the basic objectives of the project, nor is it legally feasible to adopt and implement.

CEQA requires that a second alternative be identified when the "No Project" alternative is the environmentally superior alternative (CEQA *Guidelines*, Section 15126.6(e)). Therefore, the Lesser Intensity Alternative would be the Environmentally Superior Alternative for the purpose of this analysis.

2.8 Comments on Notice of Preparation

A Notice of Preparation (NOP) for the Draft EIR was circulated on August 8, 2022, and a scoping meeting was held on August 23, 2022. A revised NOP reflecting changes to the project's list of opportunity sites was circulated on March 21, 2023. Both NOPs circulated for a period of 30 days, and the NOPs and the comments received during their respective comment periods can be found in **Appendix A** of this EIR.

In compliance with the requirements of CEQA for the initiation of environmental review, on August 2, 2021, the County sent a Notice of Preparation (NOP) to the State Clearinghouse [SCH Number 2022080196], responsible and trustee government agencies, organizations, and individuals potentially interested in the project. The NOP requested that agencies with regulatory authority

over any aspect of the project describe that authority and identify relevant environmental issues that should be addressed in the EIR. Interested members of the public were also invited to comment. circulated on August 8, 2022, and a scoping meeting was held on August 23, 2022. A revised NOP reflecting changes to the project's list of opportunity sites was circulated on March 21, 2023. Both NOPs circulated for a period of 30 days, and the NOPs and the comments received during their respective comment periods can be found in **Appendix A** of this EIR. As discussed in the NOP and pursuant to the provisions of CEQA, the County did not prepare a CEQA Initial Study prior to preparation of the EIR, because the City determined that it was clear at the time of the issuance of the NOP that an EIR was required (CEQA Guidelines Section 15060[d]).

2.9 Areas of Controversy

Section 15123(b)(2) of the CEQA *Guidelines* requires that an EIR summary identify areas of controversy known to the lead agency, including those issues raised by other agencies and the public. Issues known to have been raised by the public include concerns regarding land use and density, population and housing, and transportation. As a result, these issues are potential areas of controversy.

2.10 Issues to be Resolved

Section 15123(b)(3) of the CEQA *Guidelines* requires that an EIR present the issues to be resolved, including the choice among alternatives and whether or how to mitigate the significant effects. The major issues to be resolved for the proposed project include decisions by the County of Santa Clara, as the Lead Agency, as to whether:

- The EIR adequately describes the environmental impacts of the proposed project;
- Recommended mitigation measures should be adopted or modified;
- Additional mitigation measures need to be applied to the proposed project;
- Feasible alternatives exist that would achieve the objectives of the project and reduce significant environmental impacts;
- Selection of different housing opportunity sites would meet the City's RHNA requirements;
- Significant and unavoidable impacts would occur if the project is adopted and implemented; and
- The project should or should not be approved.

**TABLE 2-3
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE**

Impacts	Mitigation Measures	Significance after Mitigation
4.1. Aesthetics		
Impact AES-1: Implementation of the proposed project would not have a substantial adverse effect on a scenic vista. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact AES-2: Implementation of the proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact AES-3: Implementation of the proposed project would not substantially degrade the existing visual character or quality of public views or conflict with applicable zoning and other regulations governing scenic quality. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact AES-4: Implementation of the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact AES-5: Implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not result in a substantial adverse effect on a scenic vista. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact AES-6: Implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact AES-7: Implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not substantially degrade the existing visual character or quality of public views or conflict with applicable zoning and other regulations governing scenic quality. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
<p>Impact AES-8: Implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not create a new source of substantial light or glare which would adversely affect day or nighttime views. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact
4.2 Air Quality		
<p>Impact AQ-1: The project would not conflict with or obstruct implementation of the 2017 Clean Air Plan. <i>(Less than Significant Impact)</i></p>		Less than Significant Impact
<p>Impact AQ-2: The project would not result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. <i>(Less than Significant Impact)</i></p>		Less than Significant Impact
<p>Impact AQ-3: Construction and operation of individual development projects following adoption of the project could result in a cumulatively considerable net increase in criteria pollutants for which the region is in nonattainment status under an applicable federal, state, or regional ambient air quality standard. <i>(Significant and Unavoidable Impact, with Mitigation)</i></p>	<p>Mitigation Measure AQ-3a: Best Management Practices.</p> <p>All projects, regardless of size, shall implement best management practices to reduce construction impacts, particularly fugitive dust, to a less-than-significant level. Specifically, the project sponsor shall require all construction plans to specify implementation of the following best management practices:</p> <ul style="list-style-type: none"> ● 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 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. ● Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 	Significant and Unavoidable Impact, with Mitigation

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<ul style="list-style-type: none"> • All construction equipment shall be maintained and properly tuned in accordance with the 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 Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations. <p>Mitigation Measure AQ-3b: Emission Reduction Measures for Subsequent Projects Exceeding the Significance Thresholds for Criteria Pollutants.</p> <p>Project sponsors proposing projects that exceed BAAQMD screening levels shall prepare a project-level criteria air pollutant assessment of construction and operational emissions at the time the project is proposed. The project-level assessment could include a comparison of the project with other similar projects where a quantitative analysis has been conducted, or a project-specific criteria air pollutant analysis to determine whether the project exceeds the air district’s criteria air pollutant thresholds.</p> <p>In the event that a project-specific analysis finds that the project could result in significant construction and/or operational criteria air pollutant emissions that exceed significance thresholds, the project sponsor shall implement the following emission reduction measures to the degree necessary to reduce the impact to less than significance thresholds and shall implement other feasible measures as needed to reduce the impact to less than the significance thresholds.</p> <p>Clean Construction Equipment.</p> <ol style="list-style-type: none"> 1) Diesel off-road equipment shall have engines that meet the Tier 4 Final off-road emission standards, as certified by CARB, as required to reduce the emissions to less than the thresholds of significance shown in Table 2-1 of the BAAQMD CEQA Guidelines (BAAQMD 2017b). This requirement shall be verified through submittal of an equipment inventory that includes the following information: (1) Type of Equipment, (2) Engine Year and Age, (3) Number of Years Since Rebuild of Engine (if applicable), (4) Type of Fuel Used, (5) Engine HP, (6) Verified Diesel Emission Control Strategy (VDECS) information if applicable and other related equipment data. A Certification Statement is also required to be made by the Contractor for documentation of compliance and for future review by the air district as necessary. The Certification Statement must state that the Contractor agrees to compliance and acknowledges that a violation of this requirement shall constitute a material breach of contract. 2) The County may waive the equipment requirement above only under the following unusual circumstances: if a particular piece of off-road equipment with Tier 4 Final standards is technically not feasible or not commercially available; the equipment would not produce desired emissions reduction due to expected 	

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation												
	<p>operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or there is a compelling emergency need to use other alternate off-road equipment. If the County grants the waiver, the contractor shall use the next cleanest piece of off-road equipment available, as detailed in Table 4.2-8, below.</p> <p>Table 4.2-8. Off Road Equipment Compliance Step Down Approach</p> <table border="1" data-bbox="753 493 1549 662"> <thead> <tr> <th data-bbox="753 493 989 553">Compliance Alternative</th> <th data-bbox="989 493 1289 553">Engine Emissions Standard</th> <th data-bbox="1289 493 1549 553">Emissions Control</th> </tr> </thead> <tbody> <tr> <td data-bbox="753 553 989 591">1</td> <td data-bbox="989 553 1289 591">Tier 4 Interim</td> <td data-bbox="1289 553 1549 591">N/A</td> </tr> <tr> <td data-bbox="753 591 989 628">2</td> <td data-bbox="989 591 1289 628">Tier 3</td> <td data-bbox="1289 591 1549 628">ARB Level 3 VDECS</td> </tr> <tr> <td data-bbox="753 628 989 662">3</td> <td data-bbox="989 628 1289 662">Tier 2</td> <td data-bbox="1289 628 1549 662">ARB Level 3 VDCES</td> </tr> </tbody> </table> <p>3) For purposes of this mitigation measure, “commercially available” shall mean the availability of Tier 4 Final engines similar to the availability for other large-scale construction projects in the region occurring at the same time and taking into consideration factors such as (i) potential significant delays to critical-path timing of construction for the project and (ii) geographic proximity to the project site of Tier 4 Final equipment.</p> <p>4) Table 4.2-8 describes the Off Road Compliance Step Down approach. If engines that comply with Tier 4 Final off-road emission standards are not commercially available, then the Contractor shall meet Compliance Alternative 1. If off-road equipment meeting Compliance Alternative 1 are not commercially available, then the Project sponsor shall meet Compliance Alternative 2. If off-road equipment meeting Compliance Alternative 2 are not commercially available, then the Project sponsor shall meet Compliance Alternative 3 as demonstrated below.</p> <p>5) The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than 2 minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the 2-minute idling limit.</p> <p>Electric Vehicle Charging – Operational Emissions. The project sponsor shall demonstrate compliance with EV charging requirements in Tier 2 CalGreen standards in effect at the time of project review (consistent with GHG mitigation measure 4.71b). The installation of all EV charging equipment shall be included on the project drawings submitted for the construction-related permits or on other documentation submitted to the County.</p>	Compliance Alternative	Engine Emissions Standard	Emissions Control	1	Tier 4 Interim	N/A	2	Tier 3	ARB Level 3 VDECS	3	Tier 2	ARB Level 3 VDCES	
Compliance Alternative	Engine Emissions Standard	Emissions Control												
1	Tier 4 Interim	N/A												
2	Tier 3	ARB Level 3 VDECS												
3	Tier 2	ARB Level 3 VDCES												

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
<p>Impact AQ-4: The project would not result in exposure of new sensitive receptors to substantial pollutant concentrations. <i>(Non-CEQA Impact)</i></p>	<p>Not applicable.</p>	<p>Not applicable.</p>
<p>Impact AQ-5: Construction and operation of individual development projects following adoption of the project would result in emissions of fine particulate matter (PM_{2.5}) and TACs that could result in exposure of sensitive receptors to substantial pollutant concentrations. <i>(Less than Significant Impact, with Mitigation)</i></p>	<p>Mitigation Measure AQ-5a: Emission Reduction Measures for Subsequent Projects Exceeding the Significance Thresholds for Health Risks associated with TAC Emissions.</p> <p>Project sponsors proposing projects within 1,000 feet of sensitive receptors, including residences, schools, day care centers, and hospitals, shall prepare a project-level health risk assessment at the time the project is proposed. The project-level assessment could include a comparison of the project with other similar sized projects located a similar distance from receptors where a quantitative analysis has been conducted, or a project-specific analysis to determine whether the project exceeds the air district's health risk thresholds.</p> <p>If a project-specific analysis finds that the project could result in health risks that exceed significance thresholds, the project sponsor shall implement the clean construction equipment requirement of Mitigation Measure AQ-3b to the degree necessary to reduce the impact to less than significance thresholds and shall implement other feasible measures as needed to reduce the impact to less than the significant thresholds.</p>	<p>Less than Significant, with Mitigation</p>
<p>Impact AQ-6: The project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact AQ-7: The project, in conjunction with cumulative sources, would not result in exposure of sensitive receptors to substantial levels of fine particulate matter (PM_{2.5}) and TACs under cumulative conditions. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact AQ-8: The project, in combination with cumulative projects, would not combine with other sources of odors that would adversely affect a substantial number of people. <i>(Less than Significant Impact)</i></p>	<p>None required</p>	<p>Less than Significant Impact</p>

TABLE 2-3 (CONTINUED)

SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
4.3 Biological Resources		
<p>Impact BIO-1: Impact BIO-1: Implementation of the proposed project would not have a substantial adverse effect, either directly, indirectly, or through habitat modifications, on a species identified as a candidate, sensitive, or special-status in local or regional plans, policies, or regulations, or by CDFW or USFWS (nesting birds, special-status roosting bats). <i>(Less than Significant Impact, with Mitigation)</i></p>	<p>Mitigation Measure BIO-1a: Avoid and Minimize Impacts on Nesting Birds.</p> <p>Adequate measures will be implemented to avoid inadvertent take of raptor nests and other nesting birds protected under the Migratory Bird Treaty Act when in active use. This will be accomplished by taking the following steps prior to demolition, site preparation (including clearing of vegetation), and construction work within the project sites:</p> <ul style="list-style-type: none"> a) If construction is proposed during the nesting season (February 15 to August 31), a pre-construction survey for nesting raptors and other migratory birds will be conducted by a qualified biologist within 7 days prior to the onset of vegetation removal or construction to identify any active nests on the project site and in the vicinity of proposed construction. Surveys will be performed for the project area and vehicle and equipment staging areas, and suitable habitat within 150 feet of these areas, to locate any active passerine (e.g., songbird) nests and within 250 feet to locate any active raptor (bird of prey) nests. b) If no active nests are identified during the survey period, or if construction activities are initiated during the non-breeding season (September 1 to February 14), construction may proceed with no restrictions. c) If bird nests are found, an adequate no-disturbance buffer will be established around the nest location and construction activities restricted within the buffer until the qualified biologist has confirmed that any young birds have fledged and are able to leave the construction area. Required setback distances for the no-disturbance zone will be established by the qualified biologist and may vary depending on species, line-of-sight between the nest and the construction activity, and the birds' sensitivity to disturbance. As necessary, the no-disturbance zone will be fenced with temporary orange construction fencing if construction is to be initiated on the remainder of the development site. d) Any birds that begin nesting within the project area and survey buffers amid construction activities will be assumed to be habituated to construction-related or similar noise and disturbance levels and no-disturbance zones will not be established around active nests in these cases; however, should birds nesting within the project area and survey buffers amid construction activities begin to show disturbance associated with construction activities, no-disturbance buffers will be established as determined by the qualified wildlife biologist. e) Any work that must occur within established no-disturbance buffers around active nests will be monitored by a qualified biologist. If adverse effects in response to project work within the buffer are observed and could compromise the nest's success, work within the no-disturbance buffer will halt until the nest occupants have fledged. 	<p>Less than Significant, with Mitigation</p>

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<p>f) A pre-construction survey report of findings will be prepared by the qualified biologist and submitted to the Director of Planning and Development, or the Director's designee for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season. The report will either confirm absence of any active nests or will confirm that any young within a designated no-disturbance zone and construction can proceed.</p> <p>Mitigation Measure BIO-1b: Avoid and Minimize Impacts on Roosting Bats.</p> <p>A qualified biologist who is experienced with bat surveying techniques (including auditory sampling methods), behavior, roosting habitat, and identification of local bat species will be consulted prior to tree removal or building demolition activities to conduct a pre-construction habitat assessment of the HEU (parcels 649-24-013 and 649-23-001) and SCP update (all parcels) to characterize potential bat habitat and identify potentially active roost sites. No further action is required should the pre-construction habitat assessment not identify potential bat roosting habitat or signs of potentially active bat roosts within the Project area (e.g., guano, urine staining, dead bats, etc.).</p> <p>The following measures will be implemented should potential bat roosting habitat or potentially active bat roosts be identified during the habitat assessment in buildings to be demolished:</p> <p>a) In areas identified as potential roosting habitat during the habitat assessment, initial building demolition will occur when bats are active, approximately between the periods of March 1 to April 15 and August 15 to October 15, to the extent feasible. These periods avoid the bat maternity roosting season and period of winter torpor.</p> <p>b) Buildings with potential bat roosting habitat or active (outside of maternity and winter torpor seasons) roosts will be disturbed only under clear weather conditions when precipitation is not forecast for three days and when daytime temperatures are at least 50 degrees Fahrenheit.</p> <p>c) The demolition or relocation of buildings containing or suspected of containing potential bat roosting habitat or active bat roosts will be done under the supervision of a qualified biologist. When appropriate, buildings will be partially dismantled to significantly change the roost conditions, causing bats to abandon and not return to the roost, likely in the evening and after bats have emerged from the roost to forage. Under no circumstances will active maternity roosts be disturbed until the roost disbands at the completion of the maternity roosting season or otherwise becomes inactive, as determined by the qualified biologist.</p> <p>d) If avoidance of the bat maternity roosting season and period of winter torpor, defined under a), above, is infeasible, the qualified biologist will conduct pre-</p>	

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<p>construction surveys of potential bat roost sites identified during the initial habitat assessment no more than 14 days prior to building demolition.</p> <p>e) If active bat roosts or evidence of roosting is identified during pre-construction surveys for building demolition, the qualified biologist will determine, if possible, the type of roost and species. A no-disturbance buffer will be established around roost sites until the start of the seasonal windows identified above, or until the qualified biologist determines roost sites are no longer active. The size of the no-disturbance buffer would be determined by the qualified biologist and would depend on the species present, roost type, existing screening around the roost site (such as dense vegetation or a building), as well as the type of construction activity that would occur around the roost site.</p>	
<p>Impact BIO-2: Implementation of the proposed project would not have a substantial adverse effect on riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations, or by CDFW or USFWS. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact BIO-3: Implementation of the proposed project would not have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. <i>(Less than Significant Impact, with Mitigation)</i></p>	<p>Mitigation Measure BIO-3a: Aquatic Resources Delineation</p> <p>The project applicant for the specific construction activity to be undertaken and its contractors will minimize impacts on waters of the United States and waters of the state, including wetlands, by implementing the following measures:</p> <ul style="list-style-type: none"> • A preliminary jurisdictional delineation of wetlands for the two aquatic features within parcels 649-24-013 and 649-23-001 and mapped by the U.S. Fish and Wildlife Service National Wetlands Inventory (USFWS NWI) will be prepared to confirm the presence and determine the extent of waters of the United States and/or waters of the state within that area. Per Section 6.8.4, Item 4, Map of Wetlands, Ponds, Streams, and Riparian Woodlands, of the Santa Clara Valley Habitat Plan, the preliminary jurisdictional delineation must map any waters of the state that are not also Waters of the United States. The results will be summarized in a wetland delineation report to be submitted to the Director of Planning and Development, or the Director's designee, for review and approval before the issuance of any demolition, grading, or building permit for construction activity, within 150 feet of the footprint of the two aquatic features within parcels 649-24-013 and 649-23-001 as mapped by the USFWS NWI. • Impacts to wetlands identified in the preliminary jurisdictional delineation report will be avoided and minimized by implementing Mitigation Measure BIO-3b. <p>Mitigation Measure BIO-3b: Implement Condition 12, Wetland and Pond Avoidance and Minimization, of the Santa Clara Valley Habitat Plan.</p> <p>The purpose of this condition is to minimize direct and indirect impacts to wetlands and ponds and in some cases, avoid direct and indirect impacts to high quality wetlands and ponds. Direct impacts are those that directly affect a wetland or a</p>	<p>Less than Significant Impact, with Mitigation</p>

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<p>pond within its mapped boundary (see Section 6.8.4 Item 4: Map of Wetlands and Waters for a description of mapping direct impacts to wetlands in the Santa Clara Valley Habitat Plan). Project proponents are required to pay a wetland fee for impacts to wetlands and ponds to cover the cost of restoration or creation of aquatic land cover types required by this Plan (see Chapter 9 of the Santa Clara Valley Habitat Plan for details on this wetland fee). Covered activities can avoid paying the wetland fee if they avoid impacts to the wetland. All project proponents will implement the following actions to avoid and minimize impacts of covered activities on wetlands and ponds.</p> <p><u>Planning Actions</u></p> <ul style="list-style-type: none"> • Projects must be designed to avoid and minimize impacts to wetlands to the maximum extent practicable. • Applicants with streams on site must follow the stream setback requirements in Condition 11. • Applicants for coverage under the Plan must follow the requirements and guidelines in Condition 3 to minimize the effects of development on downstream hydrology, streams, and wetlands. <p><u>Design</u></p> <ul style="list-style-type: none"> • Locate septic facilities, if used, at least 100 feet from the edge of a wetland or pond if space allows. • If the runoff from the development will flow within 100 feet of a wetland or pond, install vegetated stormwater filtration features, such as rain gardens, grass swales, tree box filters, or infiltration basins, to capture and treat flows. • Plant native vegetation (shrubs and small trees) between the wetland or pond and the development such that the line of sight between the wetland or pond and the development is shielded. • If during the environmental review process, it is shown that a project has adverse indirect impacts to the wetland's function (change in hydrological functions, etc.), the project will be required to avoid these indirect effects, as determined on a case-by-case approach by the local jurisdiction, in consultation with the project proponent. Santa Clara County will coordinate avoidance measures with the project proponent. Wetlands that are not completely avoided, including indirect effects, will be considered permanently impacted and will count towards the impact caps described in Table 4-2 of the Santa Clara Valley Habitat Plan and will be assessed fees as described in Chapter 9 of the Santa Clara Valley Habitat Plan. If, however, the local jurisdiction demonstrates to the Wildlife Agencies that the wetlands to be indirectly affected are highly degraded prior to project impacts, and the Wildlife Agencies agree, impacts will not be counted toward the impact caps described in Table 4-2 of the Santa Clara Valley Habitat Plan and fees will not be assessed. "Highly 	

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<p>degraded" wetlands could include, but are not limited to, those that are indirectly affected by surrounding development or agriculture to the extent that hydrology, water quality, or habitat for covered species is adversely affected.</p> <p><u>Construction Actions</u></p> <ul style="list-style-type: none"> • Personnel conducting ground-disturbing activities in or adjacent to wetlands and ponds will be trained by a qualified biologist in these avoidance and minimization measures and the permit obligations of project proponents working under this Plan. • All wetlands and ponds to be avoided by covered activities will be temporarily staked in the field by a qualified biologist to ensure that construction equipment and personnel avoid these features. • Fencing will be erected along the outer edge of the project area, between the project area and a wetland or pond. The type of fencing will match the activity and impact types. For example, projects that have the potential to cause erosion will require erosion control barriers (see below), and projects that may bring more household pets to a site will be fenced to exclude pets. The temporal requirements for fencing also depend on the activity and impact type. For example, fencing for permanent impacts will be permanent, and fencing for short-term impacts will be removed after the activity is completed. • Appropriate erosion control measures (e.g., fiber rolls, filter fences, vegetative buffer strips) will be used on site to reduce siltation and runoff of contaminants into wetlands, ponds, streams, or riparian woodland/scrub. Filter fences and mesh will be of material that will not entrap reptiles and amphibians. Erosion control blankets will be used as a last resort because of their tendency to biodegrade slowly and trap reptiles and amphibians. • Erosion-control measures will be placed between the wetland or pond and the outer edge of the project site. • Fiber rolls used for erosion control will be certified as free of noxious weed seed. • Seed mixtures applied for erosion control will not contain invasive nonnative species but will rather be composed of native species appropriate for the site or sterile nonnative species. If sterile nonnative species are used for temporary erosion control, native seed mixtures must be used in subsequent treatments to provide long-term erosion control and slow colonization by invasive nonnatives. • Vehicles and equipment will be parked on pavement, existing roads, and previously disturbed areas. • Trash generated by covered activities will be promptly and properly removed from the site. 	

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<ul style="list-style-type: none"> • No construction or maintenance vehicles will be refueled within 200 feet of avoided wetlands and ponds unless a bermed and lined refueling area is constructed and hazardous material absorbent pads are available in the event of a spill. • All management of pest species will be conducted in compliance with the County integrated pest management (IPM) ordinance. In addition, other requirements identified in this chapter that exceed the requirements of the IPM ordinance will be implemented. • Where appropriate to control serious invasive plants, herbicides that have been approved by EPA for use in or adjacent to aquatic habitats may be used as long as label instructions are followed and applications avoid or minimize impacts on covered species and their habitats. In wetland environments, appropriate herbicides may be applied during the dry season to control nonnative invasive species (e.g., yellow star-thistle). Herbicide drift will be minimized by applying the herbicide as close to the target area as possible. Herbicides will only be applied by certified personnel in accordance with label instructions. • All organic matter should be removed from nets, traps, boots, vehicle tires and all other surfaces that have come into contact with ponds, wetlands, or potentially contaminated sediments. Items should be rinsed with clean water before leaving each study site. • Implement measures to minimize the spread of disease and non-native species based on current Wildlife Agency protocols (e.g., USFWS Revised Guidance on Site Assessments and Field Surveys for the California Red-legged Frog: Appendix B, Recommended Equipment Decontamination Procedures and other best available science. • Used cleaning materials (liquids, etc.) should be disposed of safely, and if necessary, taken off site for proper disposal. Used disposable gloves should be retained for safe disposal in sealed bags (U.S. Fish and Wildlife Service 2005). 	
<p>Impact BIO-4: Implementation of the proposed project would not interfere substantially with the movement of a native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact BIO-5: Implementation of the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. <i>(No Impact)</i></p>	<p>None required.</p>	<p>No Impact</p>

TABLE 2-3 (CONTINUED)

SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
<p>Impact BIO-6: Implementation of the proposed project would not conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. <i>(Less than Significant Impact, With Mitigation)</i></p>	<p>Implement Mitigation Measures BIO-1a, 1b, BIO-3a, and BIO-3b.</p>	<p>Less than Significant Impact, with Mitigation</p>
<p>Impact BIO-7: Implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not result in a substantial adverse effect related to biological resources. <i>(Level than Significant Impact, with Mitigation)</i></p>	<p>Implement Mitigation Measures BIO-1a, 1b, BIO-3a, and BIO-3b.</p>	<p>Less than Significant Impact</p>
<p>4.4 Cultural Resources</p>		
<p>Impact CR-1: Implementation of the proposed project could cause a substantial adverse change in the significance of an historical resource pursuant to CEQA Guidelines Section 15064.5. <i>(Significant and Unavoidable Impact, with Mitigation)</i></p>	<p>Mitigation Measure CR-1A: Identify Historical Resources.</p> <p>Prior to any demolition work or significant alterations to any building or structure that is 50 years old or older, the County shall ensure that a qualified architectural historian who meets the Secretary of the Interior’s Professional Qualification Standards evaluate the building or structure for eligibility for listing on the National Register, California Register, and as a County Historic Landmark.</p> <p>Mitigation Measure CR-1B: Identify Character-Defining Features.</p> <p>Prior to any demolition work or significant alterations initiated at a known historical resource or a resource identified via implementation of Mitigation Measure CR-1A, the County shall ensure that a qualified architectural historian who meets the Secretary of the Interior’s Professional Qualification Standards identifies character-defining features of each historical resource. Despite being presumed or having been previously determined eligible for listing in the National Register and/or California Register, character-defining features of the historical resources that would be demolished or may be significantly altered may not have been explicitly or adequately identified. According to guidance from the National Park Service, a historical resource “must retain... the essential physical features [i.e., character-defining features] that enable it to convey its historic identity. The essential physical features are those features that define both <i>why</i> a property is significant...and <i>when</i> it was significant” (National Park Service, 1997). The identification of character-defining features is necessary for complete documentation of each historical resource as well as appropriate public interpretation and salvage plans.</p> <p>Mitigation Measure CR-1C: Document Historical Resources Prior to Demolition or Alteration.</p> <p>Prior to any demolition work or significant alterations initiated of a known historical resource or a resource identified via implementation of Mitigation Measure 4.5-1A, the County shall ensure that a qualified architectural historian who meets the</p>	<p>Significant and Unavoidable Impact, with Mitigation</p>

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<p>Secretary of the Interior's Professional Qualification Standards thoroughly documents each building and associated landscaping and setting. Documentation shall include still photography and a written documentary record of the building to the National Park Service's standards of the Historic American Buildings Survey (HABS) or the Historic American Engineering Record (HAER), including accurate scaled drawings and architectural descriptions. If available, scaled architectural plans will also be included. Photos include large-format (4"x5") black-and-white negatives and 8"x10" enlargements. Digital photography may be substituted for large-format negative photography if archived locally. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site-specific and comparative archival research and oral history collection as appropriate. Copies of the records shall be submitted to the Northwest Information Center at Sonoma State University.</p>	
<p>Impact CR-2: Implementation of the proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. <i>(Less than Significant Impact, with Mitigation)</i></p>	<p>Mitigation Measure CR-2A: Cultural Resources Study Requirements.</p> <p>The County shall ensure that a cultural resources records search is performed at the Northwest Information Center (NWIC) of the California Historical Resources Information System for the project area of all discretionary housing development projects arising from the HEU that require ground disturbance (i.e., excavation, trenching, grading, etc.). To receive project approval, an archaeologist meeting the U.S. Secretary of the Interior's Standards (SOIS) for Archeology must review the results and identify if the project would potentially impact cultural resources. Additionally, the County shall consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) to be affiliated with Santa Clara County to determine if there are tribal cultural resources that may be impacted by development of housing opportunity sites or the possible future elementary school site on Stanford's campus and allow tribes to request additional project- and site-specific mitigation.</p> <p>If the archaeologist determines that known cultural resources or potential archaeologically sensitive areas may be impacted by the project, a pedestrian survey must be conducted under the supervision of a SOIS-qualified archaeologist of all accessible portions of the project area, if one has not been completed within the previous five years. Additional research, including subsurface testing, monitoring during construction, and/or a cultural resources awareness training may be required to identify, evaluate, and mitigate impacts to cultural resources, as recommended by the SOIS-qualified archaeologist. If avoidance is not feasible, the County shall consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) to be affiliated with Santa Clara County for the purposes of tribal consultation under Chapter 905, California Statutes of 2004 (if the resource is pre-contact or indigenous) to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2 and CEQA Guidelines Section 15126.4. This shall include documentation of the resource and may include data recovery (according to PRC Section 21083.2), if deemed appropriate, or other actions such</p>	<p>Less than Significant Impact, with Mitigation</p>

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<p>as treating the resource with culturally appropriate dignity and protecting the cultural character and integrity of the resource (according to PRC Section 21084.3). A cultural report detailing the results of the research shall be prepared and submitted for review by the County and a final draft shall be submitted to the NWIC. Once the report has been approved by the County, the County may issue appropriate permits.</p> <p>Mitigation Measure CR-2B: Inadvertent Discovery of Cultural Resources.</p> <p>If pre-contact or historic-era archaeological resources are encountered during project construction and implementation, all construction activities within 100 feet shall halt and the County shall be notified. Pre-contact archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-age materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. An archaeologist meeting the U.S. Secretary of the Interior's Standards (SOIS) for Archeology shall inspect the findings within 24 hours of discovery.</p> <p>If the County determines that the resource qualifies as a historical resource or a unique archaeological resource (as defined pursuant to the CEQA Guidelines) and that the project has potential to damage or destroy the resource, mitigation shall be implemented in accordance with PRC Section 21083.2 and CEQA Guidelines Section 15126.4, with a preference for preservation in place. If preservation in place is feasible, this may be accomplished through one of the following means as per Program LU-22.1.6 of the General Plan: (1) siting improvements to completely avoid the archaeological resource; (2) incorporating the resource into a park or dedicated open space, or by deeding the resource into a permanent conservation easement; (3) capping and covering the resource before building the project on the resource site after the resource has been thoroughly studied by a SOIS qualified archaeologist and a report written on the findings.</p> <p>If avoidance is not feasible, the County shall consult with appropriate Native American tribes (if the resource is pre-contact), and other appropriate interested parties to determine treatment measures to avoid, minimize, or mitigate any potential impacts to the resource pursuant to PRC Section 21083.2, and CEQA Guidelines Section 15126.4. This shall include documentation of the resource and may include data recovery (according to PRC Section 21083.2), if deemed appropriate, or other actions such as treating the resource with culturally appropriate dignity and protecting the cultural character and integrity of the resource (according to PRC Section 21084.3).</p>	

TABLE 2-3 (CONTINUED)

SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
<p>Impact CR-3: Implementation of the proposed project could disturb human remains, including those interred outside of designated cemeteries (<i>Less than Significant Impact, with Mitigation</i>)</p>	<p>Mitigation Measure CR-3: Inadvertent Discovery of Human Remains. Procedures of conduct following the discovery of human remains have been mandated by Health and Safety Code Section 7050.5, Public Resources Code Section 5097.98 and the California Code of Regulations Section 15064.5 (CEQA). According to the provisions in CEQA, if human remains are encountered, the Project applicant shall ensure that all work in the immediate vicinity of the discovery shall cease and necessary steps are taken to ensure the integrity of the immediate area. The Santa Clara County Coroner shall be notified immediately. The Coroner shall then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner shall notify the NAHC within 24 hours, who will, in turn, notify the person the NAHC identifies as the Most Likely Descendant (MLD) of any human remains. Further actions shall be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the landowner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance.</p>	<p>Less than Significant Impact, with Mitigation</p>
<p>Impact CR-4: Implementation of the proposed project, in combination with other cumulative development, could cause a substantial adverse change in the significance of historical resources pursuant to CEQA Guidelines Section 15064.5. (<i>Significant and Unavoidable Impact, with Mitigation</i>)</p>	<p>Mitigation Measure: Implement Mitigation Measures CR-1A, CR-1B, and CR-1C.</p>	<p>Significant and Unavoidable Impact, with Mitigation</p>
<p>Impact CR-5: Implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not result in a substantial adverse effect on the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 or a tribal cultural resource as defined in Public Resources Code Section 21074 or could disturb human remains, including those interred outside of formal cemeteries. (<i>Less than Significant Impact, with Mitigation</i>)</p>	<p>Mitigation Measure: Implement Mitigation Measures CR-2A, CR-2B, and CR-3.</p>	<p>Less than Significant Impact, with Mitigation</p>
<p>4.5 Energy</p>		
<p>Impact EN-1: Implementation of the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during project construction and operation. (<i>Less than Significant Impact</i>)</p>	<p>None required.</p>	<p>Less than Significant Impact</p>

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
Impact EN-2: Implementation of the proposed project update would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact EN-3: Implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not in result energy use that would be considered wasteful and unnecessary, or conflict with or obstruct a state or local plan for renewable energy or energy efficiency under cumulative conditions. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
4.6 Geology, Soils, and Paleontological Resources		
Impact GEO-1: Implementation of the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact GEO-2: Implementation of the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact GEO-3: Implementation of the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic related ground failure, including liquefaction. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact GEO-4: Implementation of the proposed project would not result in substantial soil erosion or the loss of topsoil. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact GEO-5: Implementation of the proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact GEO-6: Implementation of the proposed project would not be located on expansive soil creating substantial direct or indirect risks to life or property. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
<p>Impact GEO-7: Implementation of the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. <i>(Less than Significant Impact, with Mitigation)</i></p>	<p>Mitigation Measure GEO-1: Determination of Paleontological Potential.</p> <p>Prior to issuance of a grading permit for any project that requires ground disturbance (i.e., excavation, grading, trenching, etc.) in previously undisturbed deposits of Holocene-age alluvium and Pleistocene-age alluvium below a depth of six feet, the project will undergo a CEQA-level analysis to determine the potential for a project to encounter significant paleontological resources, based on a review of site-specific geology and the extent of ground disturbance associated with each project. The analysis shall include but would not be limited to: 1) a paleontological records search, 2) geologic map review, and 3) peer-reviewed scientific literature review. If it is determined that a site has the potential to disturb or destroy significant paleontological resources, a professional paleontologist (meeting the Society of Vertebrate Paleontology [SVP] standards), will be retained to recommend appropriate mitigation to reduce or avoid significant impacts to paleontological resources, based on project-specific information. Such measures could include but would not be limited to: 1) preconstruction worker awareness training, 2) paleontological resource monitoring, and 3) salvage of significant paleontological resources.</p>	<p>Less than Significant Impact, with Mitigation</p>
<p>Impact GEO-C: Implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not result in a substantial adverse effect related to geology, paleontological resources, and mineral resources. <i>(Less than Significant Impact, with Mitigation)</i></p>	<p>Mitigation Measure: Implement Mitigation Measure GEO-1.</p>	<p>Less than Significant Impact, with Mitigation</p>
<p>4.7 Greenhouse Gas Emissions</p>		
<p>Impact GHG-1: Implementation of the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. <i>(Less than Significant Impact, with Mitigation)</i></p>	<p>Mitigation Measure GHG-1: Require implementation of most recent CALGreen Tier 2 standards for EV infrastructure.</p> <p>Subsequent housing development projects facilitated by the project shall comply with EV charging requirements in the most recently adopted version of CALGreen Tier 2 at the time that a building permit application is filed.</p>	<p>Less than Significant Impact, with Mitigation</p>
<p>Impact GHG-2: Implementation of the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. <i>(Less than Significant Impact, with Mitigation)</i></p>	<p>Mitigation Measure: Implement Mitigation Measure GHG-1.</p>	<p>Less than Significant Impact, with Mitigation</p>

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
4.8 Hazards and Hazardous Materials		
<p>Impact HAZ-1: Implementation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact
<p>Impact HAZ-2: Implementation of the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact
<p>Impact HAZ-3: Implementation of the proposed project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment. <i>(Less than Significant Impact with Mitigation)</i></p>	<p>Mitigation Measure HAZ-1, Conduct Phase I Environmental Site Assessment</p> <p>Prior to development on any project site, the project applicant shall conduct a Phase I Environmental Site Assessment in general accordance with the current version of ASTM 1527 <i>Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process</i>. This Standard requires checking regulatory agency databases such as the SWRCB GeoTracker and DTSC EnviroStor websites for the status of hazardous waste sites and landfill investigations and cleanups at the time of the proposed development, visually inspecting sites for hazardous materials, and interviewing persons knowledgeable about the site regarding hazardous materials use. The results of the Phase I assessment may indicate the potential or actual presence of hazardous materials, which would require subsequent investigations and cleanups. These investigations and cleanups would be required to comply with the regulatory requirements summarized in the Regulatory Setting.</p> <p>Mitigation Measure HAZ-2: Health and Safety Plan</p> <p>Before the start of ground-disturbing activities, including grading, trenching, or excavation, or structure demolition on any project site, the project applicant shall require that construction contractor(s) retain a qualified professional to prepare a site-specific health and safety plan (HASP) in accordance with federal Occupational Safety and Health Administration regulations (29 CFR 1910.120) and California Occupational Safety and Health Administration regulations (8 CCR Section 5192).</p> <p>The HASP shall be implemented by the construction contractor(s) to protect construction workers, the public, and the environment during all ground-disturbing and construction activities. HASPs shall be submitted to the County of Santa Clara Department of Environmental Health for review before the start of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The HASP shall include, but not be limited to, the following elements:</p>	Less than Significant Impact, with Mitigation

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<ul style="list-style-type: none"> • Designation of a trained, experienced site safety and health supervisor who has the responsibility and authority to develop and implement the site HASP. • A summary of all potential risks to demolition and construction workers and maximum exposure limits for all known and reasonably foreseeable site chemicals. • Specified personal protective equipment and decontamination procedures, if needed. • The requirement to prepare documentation showing that HASP measures have been implemented during construction (e.g., tailgate safety meeting notes with signup sheet for attendees). • A requirement specifying that any site worker who identifies hazardous materials has the authority to stop work and notify the site safety and health supervisor. • Emergency procedures, including the route to the nearest hospital. • Procedures to follow if evidence of potential soil or groundwater contamination is encountered (such as soil staining, noxious odors, debris or buried storage containers). These procedures shall be followed in accordance with hazardous waste operations regulations and specifically include, but not be limited to, immediately stopping work in the vicinity of the unknown hazardous materials release; notifying the County and retaining a qualified environmental firm to perform sampling and remediation. <p>Mitigation Measure HAZ-3: Site Management Plan</p> <p>In support of the HASP described in Mitigation Measure HAZ-2, the project applicant for the specific work proposed shall require that contractor(s) develops and implements a site management plan (SMP) for the management of soil, soil gas, and groundwater before any ground-disturbing activity for properties with known or suspected contamination. The SMP shall include the following, at a minimum:</p> <ul style="list-style-type: none"> • Site description, including the hazardous materials that may be encountered. • Roles and responsibilities of onsite workers, supervisors, and the regulatory agency. • Training for site workers focused on the recognition of and response to encountering hazardous materials. • Protocols for the materials (soil and dewatering effluent) testing, handling, removing, transporting, and disposing of all excavated materials and dewatering effluent in a safe, appropriate, and lawful manner. • Reporting requirement to the County of Santa Clara Department of Environmental Health, documenting that site activities were conducted in accordance with the SMP. 	

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<ul style="list-style-type: none"> The SMP shall be submitted to the County of Santa Clara Department of Environmental Health for review before the start of demolition and construction activities and as a condition of the grading, construction, and/or demolition permit(s). The contract specifications shall mandate full compliance with all applicable federal, state, and local regulations. 	
<p>Impact HAZ-4: Implementation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact
<p>Impact HAZ-5: Implementation of the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area related to a public airport or public use airport. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact
<p>Impact HAZ-6: Implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not result in a substantial adverse effect related to hazards and hazardous materials. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact
4.9 Hydrology and Water Quality		
<p>Impact HYD-1: Implementation of the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. <i>(Less than Significant Impact, with Mitigation)</i></p>	<p>Mitigation Measure 4.9-1, Stanford Well Review: Prior to issuance of a demolition or building permit, Stanford shall review its historic wells survey to determine the potential for encountering any groundwater wells within the area of proposed improvements and confirm that no historic wells not properly closed are located at the location of the proposed development. If discovered, and the well is no longer part of operations and was not abandoned in accordance with applicable requirements, Stanford shall fulfill the applicable well abandonment/destruction permit requirements. Stanford shall contact the applicable regulatory agency to locate existing inactive wells and confirm adherence to well abandonment/destruction requirements.</p>	Less than Significant Impact, with Mitigation
<p>Impact HYD-2: Implementation of the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
<p>Impact HYD-3: Implementation of the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would : i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact HYD-4: In a flood hazard, seiche, or dam breach inundation zone, implementation of the proposed project would not risk release of pollutants due to inundation. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact HYD-5: Implementation of the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact HYD-6: Implementation of the proposed project, in combination with past, present, and reasonably foreseeable future development, would result in a less than significant cumulative impact with respect to hydrology and water quality. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>4.10 Land Use and Planning</p>		
<p>Impact LU-1: Implementation of the proposed project would not physically divide an established community. <i>(No Impact)</i></p>	<p>None required.</p>	<p>No impact</p>
<p>Impact LU-2: Implementation of the proposed project would not cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>

TABLE 2-3 (CONTINUED)

SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
<p>Impact LU-3: Implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not physically divide an established community. (<i>Less than Significant Impact</i>)</p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact LU-4: Implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (<i>Less than Significant Impact</i>)</p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>4.11 Noise and Vibration</p>		
<p>Impact NOI-1: Construction activities associated with implementation of the proposed project would not result in generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (<i>Significant and Unavoidable Impact, with Mitigation</i>)</p>	<p>Mitigation Measure NOI-1: Best Management Practices for Construction Noise Control.</p> <p>Noise Control. Require contractors to implement noise controls for on-site activities and describe measures that shall be implemented to reduce the potential for noise disturbance at adjacent or nearby residences. Noise control measures required by the specification include:</p> <ul style="list-style-type: none"> • Contractor is responsible for taking appropriate measures, including muffling of equipment, selecting quieter equipment, erecting noise barriers, modifying work operations, and other measures to bring construction noise into compliance. • Each internal combustion engine used for any purpose on the job or related to the job, shall be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine shall be operated on the project without said muffler. • Best available noise control techniques (including mufflers, intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds) shall be used for all equipment and trucks. • Stationary noise sources (e.g., chippers, grinders, compressors) shall be located as far from sensitive receptors as possible. If they must be located near receptors, adequate muffling (with enclosures) shall be used. Enclosure opening or venting shall face away from sensitive receptors. Enclosures shall be designed by a registered engineer regularly involved in noise control analysis and design. • Material stockpiles as well as maintenance/equipment staging and parking areas (all on site) shall be located as far as practicable from residential receptors. • If impact equipment (e.g., jack hammers, pavement breakers, and rock drills) is used, the contractor is responsible for taking appropriate measures, including but not limited to the following: 	<p>Significant and Unavoidable Impact, with Mitigation</p>

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<ul style="list-style-type: none"> - Hydraulically or electric-powered equipment shall be used wherever feasible to avoid the noise associated with compressed-air exhaust from pneumatically powered tools. However, where the use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed-air exhaust shall be used (a muffler can lower noise levels from the exhaust by up to about 10 dB). External jackets on the tools themselves shall be used, where feasible, which could achieve a reduction of 5 dB. Quieter procedures, such as drilling rather than impact equipment, will be used whenever feasible. It is the contractor's responsibility to implement any mitigations necessary to meet applicable noise requirements. - Impact construction including jackhammers, hydraulic backhoe, concrete crushing/recycling activities, and vibratory pile drivers will be limited to between 8:00 a.m. and 4:00 p.m., Monday through Friday, within residential communities, and will be limited in duration to the maximum extent feasible. <p>NOI-2: Noise Control for Pile Installation Activities.</p> <p>When pile driving would occur within 300 feet of a noise-sensitive receptor, implement "quiet" pile-driving technology (such as pre-drilling of piles, sonic pile drivers, auger cast-in-place, or drilled-displacement), where feasible, in consideration of geotechnical and structural requirements and conditions.</p> <ul style="list-style-type: none"> • Where the use of driven impact piles cannot be avoided, properly fit impact pile driving equipment with an intake and exhaust muffler and a sound-attenuating shroud, as specified by the manufacturer. • Limit pile driving activities to weekdays from 9:00 a.m. to 4:00 p.m. if occurring within 500 feet of a noise-sensitive receptor. • Notify neighboring noise-sensitive receptors within 500 feet of a PMA construction area at least 30 days in advance of high-intensity noise-generating activities (e.g., well drilling, pile driving, and other activities that may generate noise levels greater than 90 dBA at noise sensitive receptors) about the estimated duration of the activity. 	
<p>Impact NOI-2: Stationary noise sources from development associated with the proposed project would not result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact NOI-3: Implementation of the proposed project would not result in exposure of persons to or generation of excessive groundborne vibration levels. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
Impact NOI-4: Transportation activities under the proposed project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact NOI-5: Implementation of the proposed project would not expose people residing or working in the project area to excessive noise levels due to being located within the vicinity of a private airstrip or an airport land use plan or within two miles of a public airport or public use airport. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact NOI-6: Construction activities associated with implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not result in generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. <i>(Less than Significant Impact with Mitigation)</i>	Mitigation Measures: Implement Mitigation Measures NOI-1 and MOI-2.	Less than Significant Impact, with Mitigation
Impact NOI-7: Stationary noise sources from development within the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact NOI-8: Construction activities associated with implementation of the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not result in exposure of persons to or generation of excessive ground borne vibration levels. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact NOI-9: Transportation activities under the proposed project, when combined with other past, present, or reasonably foreseeable projects, would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact

TABLE 2-3 (CONTINUED)

SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
4.12 Population and Housing		
<p>Impact PH-1: Implementation of the project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact
<p>Impact PH-2: Implementation of the project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact
<p>Impact PH-3: Implementation of the project, when combined with other past, present, or reasonably foreseeable projects, would not result in a substantial adverse effect related to population and housing. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact
4.13 Public Services and Recreation		
<p>Impact PSR-1: Implementation of the proposed project would not result in an increase in demand for fire protection and emergency medical response services that would require new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives, construction of which could have significant physical environmental impacts. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact
<p>Impact PSR-2: Implementation of the proposed project would not result in an increase in demand for police protection services that would require new or physically altered police facilities in order to maintain acceptable service ratios, response times, or other performance objectives, construction of which could have significant physical environmental impacts. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact
<p>Impact PSR-3: Implementation of the proposed project would not result in an increase in new students for public schools at a level that would require new or physically altered school facilities in order to maintain acceptable service ratios or other performance objectives, construction of which would have significant physical environmental impacts. <i>(Less than Significant Impact)</i></p>	None required.	Less than Significant Impact

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
Impact PSR-4: Implementation of the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact PSR-5: Implementation of the proposed project would not include recreational facilities or require the construction or expansion of parks or recreational facilities which might have an adverse physical effect on the environment. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact PSR-6: Implementation of the proposed project would not result in substantial adverse impacts associated with the provision of or the need for new or physically altered library facilities. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact PSR-7: The proposed project, combined with cumulative development in the vicinity of the HEU housing opportunity sites and Countywide, would not result in an adverse cumulative increase in demand for public services that would require new or physically altered governmental or facilities, construction of which could have significant physical environmental impacts. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
4.14 Transportation		
Impact TRANS: Implementation of the proposed project would not conflict with an applicable program, plan, ordinance, or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, bicycle, and pedestrian facilities. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact TRANS: Implementation of the proposed project could exceed an applicable VMT threshold of significance <i>(Significant and Unavoidable Impact, with Mitigation)</i>	Mitigation Measure TRANS: Implement VMT Reduction Measures. Individual multifamily housing development proposals that are not exempt from CEQA or VMT impact analysis shall be required to provide a quantitative VMT analysis using the methodology specified by the County (or annexing city). Projects that would result in a significant VMT impact shall include travel demand management measures and/or physical measures (i.e. improving multimodal transportation network, improving street connectivity) to reduce VMT, including but not limited to the measures below, which have been identified as potentially VMT reducing in the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity (December 2021).	Significant and Unavoidable Impact, with Mitigation

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
	<p>Potential VMT reduction estimates are included below, but detailed requirements, calculation steps, and limitations are described in the CAPCOA Handbook.</p> <ul style="list-style-type: none"> • Unbundle parking costs (i.e., sell or lease parking separately from the housing unit). Effectiveness: up to 15.7 percent reduction in GHG from VMT per the CAPCOA Handbook. • Provide car-sharing, bike-sharing, or scooter-sharing programs. Effectiveness: 0.15 – 0.18 percent reduction in GHG from VMT for car share, 0.02 – 0.06 percent for bike-share, and 0.07 percent for scooter-share, per the CAPCOA Handbook. The higher car-share and bike-share values are for electric car and bike-share programs. <p>Subsidize transit passes for residents of affordable housing. Effectiveness: up to 5.5 percent reduction in GHG from VMT per the CAPCOA Handbook.</p>	
<p>Impact TRANS: Implementation of the proposed project would not result in designs for on-site circulation, access, and parking areas that fail to meet County or industry standard design guidelines. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact TRANS: Implementation of the proposed project would not result in inadequate emergency access to development sites. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact TRANS: Implementation of the proposed project, in combination with cumulative development, would not conflict with an applicable program, plan, ordinance or policy establishing measures of effectiveness for the performance of addressing the circulation system, including transit, bicycle, and pedestrian facilities. <i>(Less than Significant)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>
<p>Impact TRANS: Implementation of the proposed project, in combination with cumulative development, could exceed an applicable VMT threshold of significance <i>(Significant and Unavoidable Impact, with Mitigation)</i></p>	<p>Mitigation Measure: Implement Mitigation Measure TRANS 4.14-2.</p>	<p>Significant and Unavoidable Impact, with Mitigation</p>
<p>Impact TRANS: Implementation of the proposed project, in combination with cumulative development, would not result in designs for on-site circulation, access, and parking areas that fail to meet County or industry standard design guidelines. <i>(Less than Significant Impact)</i></p>	<p>None required.</p>	<p>Less than Significant Impact</p>

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
Impact TRANS: Implementation of the proposed project, in combination with cumulative development, would not result in inadequate emergency access to development sites. <i>(Less than Significant Impact)</i>	None required.	
4.15 Tribal Cultural Resources		
Impact TCR-1: Implementation of the project would not cause a substantial adverse change to tribal cultural resources, as defined in Public Resources Code Section 21074(a). <i>(Less than Significant Impact, with Mitigation)</i>	Mitigation Measure: Implement Mitigation Measures CR-2A, CR-2B, and CR-3.	Less than Significant Impact, with Mitigation
Impact TCR-2: Implementation of the project, when combined with other past, present, or reasonably foreseeable projects, would not cause a substantial adverse change to tribal cultural resources, as defined in Public Resources Code Section 21074(a). <i>(Less than Significant Impact, with Mitigation)</i>	Mitigation Measure: Implement Mitigation Measures CR-2A, CR-2B, and CR-3.	Less than Significant Impact, with Mitigation
4.16 Utilities and Service Systems		
Impact UT-1: Implementation of the proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact UT-2: Implementation of the proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact UT-3: Implementation of the proposed project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact

TABLE 2-3 (CONTINUED)
SUMMARY OF IMPACTS AND MITIGATION MEASURES FOR THE COUNTY OF SANTA CLARA HOUSING ELEMENT UPDATE AND STANFORD COMMUNITY PLAN UPDATE

Impacts	Mitigation Measures	Significance after Mitigation
Impact UT-4: Implementation of the proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact UT-5: Implementation of the proposed project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact
Impact UT-6: The proposed project, in combination with past, present, existing, approved, pending, and reasonably foreseeable future projects in the vicinity, would not contribute considerably to cumulative impacts on utilities and service systems. <i>(Less than Significant Impact)</i>	None required.	Less than Significant Impact