

Draft Initial Study

1957 Pruneridge Avenue Residential Allowing Natural Gas Usage Project



In Consultation with

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ENVIRONMENTAL CONSULTANTS & PLANNERS

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Appendices

Appendix A: Air Quality and Greenhouse Gas Assessment

Appendix B: Transportation Demand Management Analysis

All appendices are incorporated herein by reference. No other documents are incorporated by reference.

Section 1.0 Introduction and Purpose

1.1 Purpose of the Initial Study

The City of Santa Clara, as the Lead Agency, has prepared this Initial Study for the 1957 Pruneridge Avenue Residential Allowing Natural Gas Usage Project in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations §15000 et. seq.) and the regulations and policies of the City of Santa Clara, California.

In March 2024, the City of Santa Clara, as the Lead Agency, certified the 1957 Pruneridge Avenue Residential Project Environmental Impact Report (EIR). The EIR analyzed the replacement of the then-existing two buildings on-site which made up the St. Marks Episcopal Church, with 22, two-story residential units at a density of 8.9 dwelling units per acre (du/ac).

The intent and purpose of the EIR was to provide project-level environmental review for the residential project. This Initial Study tiers from the certified EIR and provides analysis for the proposed changes to the project and assesses the differences of the project compared to the previously analyzed design.

The project proposes revising the approved entitlement to replace the approved electric stovetops in the project with 22 natural gas stovetops. This Initial Study evaluates the environmental impacts that might reasonably be anticipated to result from implementation of the proposed project.

1.2 Public Review Period

Publication of this Initial Study marks the beginning of a 20-day public review and comment period. During this period, the Initial Study will be available to local, state, and federal agencies and to interested organizations and individuals for review. Written comments concerning the environmental review contained in this Initial Study during the 20-day public review period should be sent to:

Lesley Xavier
1500 Warburton Avenue
Santa Clara, CA 95050

1.3 Consideration of the Initial Study and Project

Following the conclusion of the public review period, the City of Santa Clara will consider the adoption of the Initial Study/Mitigated Negative Declaration (MND) for the project at a regularly scheduled meeting. The City shall consider the Initial Study/MND together with any comments received during the public review process. Upon adoption of the MND, the City may proceed with project approval actions.

1.4 Notice of Determination

If the project is approved, the City of Santa Clara will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office for 30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15075(g)).

Section 2.0 Project Information

2.1 Project Title

1957 Pruneridge Avenue Residential Allowing Natural Gas Usage Project

2.2 Lead Agency Contact

Lesley Xavier
1500 Warburton Avenue
Santa Clara, CA 95050

2.3 Project Applicant

SCS Development

2.4 Project Location

1957 Pruneridge Avenue, Santa Clara, California 95050

2.5 Assessor's Parcel Number

APN 303-03-025

2.6 General Plan Designation and Zoning District

Planned Development (PD) Zoning District
Very Low Density Residential General Plan Designation

2.7 Project-Related Approvals, Agreements, and Permits

Modification of Planned Development Permit

Section 3.0 Project Description

3.1 Existing Project Site

The 2.47-acre project site is located at 1957 Pruneridge Avenue in the City of Santa Clara. The neighborhood is fully developed with a variety of uses and the surrounding properties include single family residences to the north and west, a commercial development to the east, and a mix of businesses and residences along Pruneridge Avenue to the south.

The property is designated Very Low Density Residential in the General Plan and has a Zoning designation of Planned Development (PD). The property is currently vacant.

3.2 Approved Residential Development

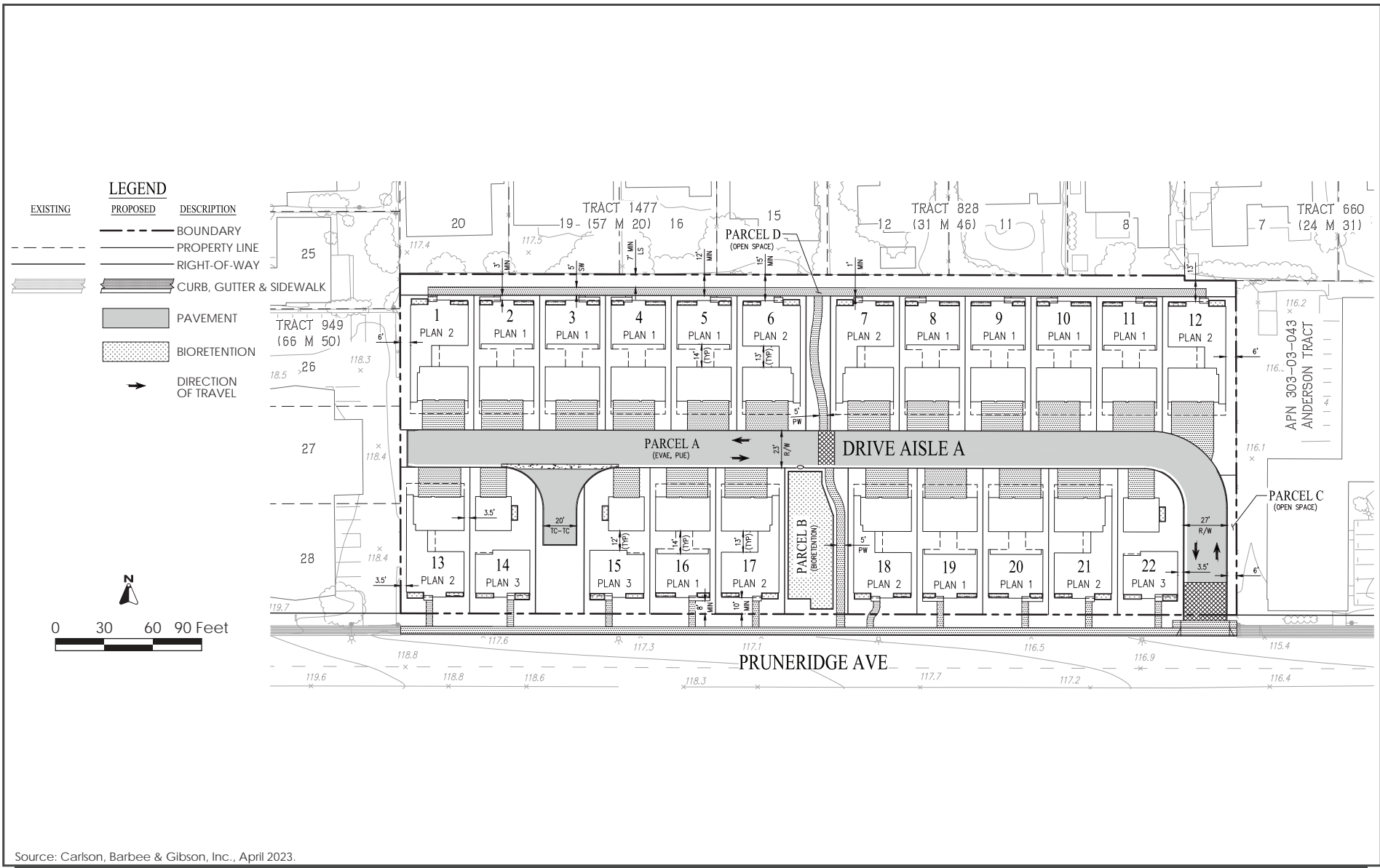
In March 2024, the City approved demolition of the two buildings previously on-site, which made up the St. Mark's Episcopal Church, and construction of a 22-unit, single-family residential development. The project would be constructed over seven months.

Each unit would include a two to three car garage. Additionally, the project site would include a landscaped paseo in the middle of the site that would provide access to the sidewalk on Pruneridge Avenue. Access to the project site would be provided by an ingress/egress driveway at the east end of the project site. The driveway would connect to a drive aisle which separates the units on the north and south sides of the project site.

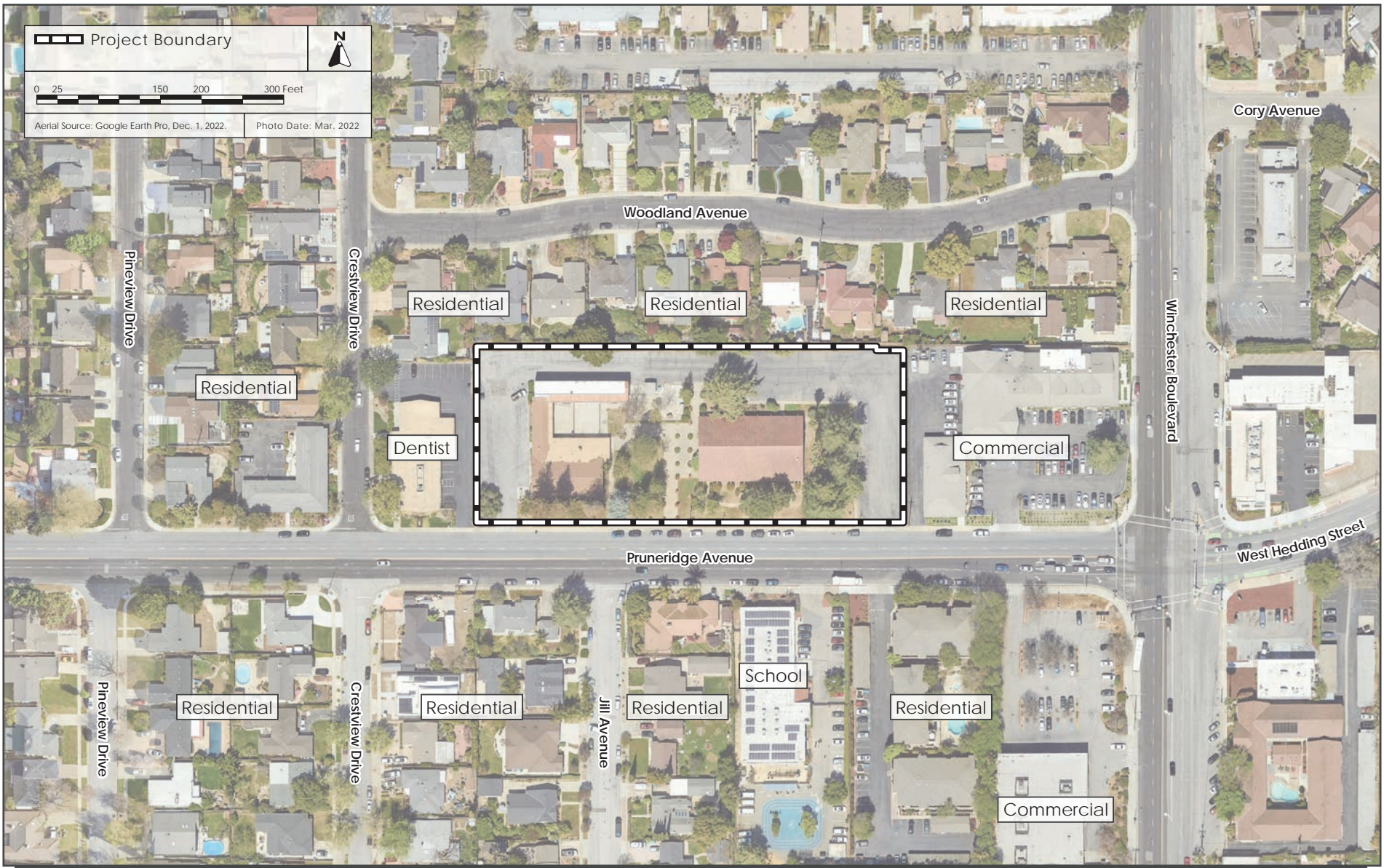
Three of the residential units would be affordable units compliant with the City of Santa Clara Affordable Housing program.

The approved project would include the planting of approximately 79, 24- to 36- inch box trees throughout the site and would feature drought tolerant, low water use landscaping in the common areas and yards of the residential units. The project proposed to be 100 percent electric.

The approved site plan and aerial of project site and surrounding areas are included in Figures 3.2-1 and 3.2-2.



Source: Carlson, Barbee & Gibson, Inc., April 2023.



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 3.2-2

3.3 Modified Project

As proposed, the modified project would retain all the project design features of the approved project, with the exception of the project being 100 percent electric. The modified project would replace the 22 electric stoves in the approved residences with 22 natural gas stovetops. This would not alter the access or parking of the approved project. Project construction would only be slightly adjusted to connect the gas utilities to the site, this trenching was accounted for in the approved project since it included utilities trenching and any additional trenching would be inconsequential.

Section 4.0 Environmental Setting, Checklist, and Impact Discussion

The discussion below describes the environmental impacts of the modified project compared to the impacts of the approved 1957 Pruneridge Avenue Residential Project. Also noted are any changes that have occurred in the environmental setting that would result in new impacts or impacts of greater severity than those identified in the previously certified EIR. This Initial Study only addresses those resource areas which could potentially have new impacts or impacts of greater severity (specific to the project site) than were addressed in the EIR. Based on the project’s consistency with the development assumptions and General Plan and zoning designations, and the fact that the actual construction and design of the project would remain consistent, the modified project would have the same impacts with regard to the following environmental issues.

- Aesthetics
- Agriculture and Forestry Resources
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire
- Mandatory Findings of Significance

All best management practices, conditions of approval, and mitigation measures identified in the certified 1957 Pruneridge Avenue Residential Project EIR are incorporated by reference and will still be required by the project.

The modified project would add 22, natural gas stovetops to the project. This would not change the approved project design or result in construction of new project features. Therefore, this Initial Study only analyzes the operational impacts of the modified project with regard to the following environmental issues:

- Air Quality
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning
- Transportation

The discussion for each environmental subject includes the following subsections:

- **Environmental Setting** – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2)

describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.

- **Impact Discussion** – This subsection 1) includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts and 2) discusses the project’s impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. “Mitigation measures” are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Mitigation measures are numbered to correspond to the impact they address. For example, MM GHG-1.1 refers to the first mitigation measure for the first impact in the Greenhouse Gas Emissions section.

4.1 Air Quality

The change to the 2024 approved residential project relevant to air quality is the addition of 22 natural gas stovetops, which would result in adjusted operational emissions on-site. The following analysis addresses the air quality impacts that would result from operation of the modified project. Construction impacts would remain the same as under the approved project.

4.1.1 Environmental Setting

4.1.1.1 Background Information

Air quality in the Bay Area is assessed related to six common air pollutants (referred to as criteria pollutants), including ground-level ozone (O₃), nitrogen oxides (NO_x), particulate matter (PM), carbon monoxide (CO), sulfur oxides (SO_x), and lead.¹ Criteria pollutants are regulated because they result in health effects. An overview of the sources of criteria pollutants and their associated health are summarized in Table 4.1-1. The most commonly regulated criteria pollutants in the Bay Area are discussed further below.

Table 4.1-1: Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
O ₃	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	<ul style="list-style-type: none">• Aggravation of respiratory and cardiovascular diseases• Irritation of eyes• Cardiopulmonary function impairment
Nitrogen Dioxide (NO ₂)	Motor vehicle exhaust, high temperature stationary combustion, atmospheric reactions	<ul style="list-style-type: none">• Aggravation of respiratory illness• Reduced visibility
Fine Particulate Matter (PM _{2.5}) and Coarse Particulate Matter (PM ₁₀)	Stationary combustion of solid fuels, construction activities, industrial processes, atmospheric chemical reactions	<ul style="list-style-type: none">• Reduced lung function, especially in children• Aggravation of respiratory and cardiorespiratory diseases• Increased cough and chest discomfort• Reduced visibility
Toxic Air Contaminants (TACs)	Cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; building materials and products	<ul style="list-style-type: none">• Cancer• Chronic eye, lung, or skin irritation• Neurological and reproductive disorders

High O₃ levels are caused by the cumulative emissions of reactive organic gases (ROG) and NO_x. These precursor pollutants react under certain meteorological conditions to form high O₃ levels.

¹ The area has attained both state and federal ambient air quality standards for CO. The project does not include substantial new emissions of sulfur dioxide or lead. These criteria pollutants are not discussed further.

Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce O₃ levels. The highest O₃ levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources.

PM is a problematic air pollutant of the Bay Area. PM is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM₁₀) and fine particulate matter where particles have a diameter of 2.5 micrometers or less (PM_{2.5}). Elevated concentrations of PM₁₀ and PM_{2.5} are the result of both region-wide emissions and localized emissions.

Toxic Air Contaminants (TAC)

TACs are a broad class of compounds known to have health effects. They include but are not limited to criteria pollutants. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway).

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (most susceptible to injury).² Chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the California Air Resources Board (CARB).

Sensitive Receptors

Some groups of people are more affected by air pollution than others. CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, the elderly over 65, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools.

² California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed October 31, 2022. <https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>.

4.1.1.2 *Regulatory Framework*

Federal and State

Clean Air Act

At the federal level, the United States Environmental Protection Agency (EPA) is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants (discussed previously), including PM, O₃, CO, SO_x, NO_x, and lead.

CARB is the state agency that regulates mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act. The EPA and the CARB have adopted ambient air quality standards establishing permissible levels of these pollutants to protect public health and the climate. Violations of ambient air quality standards are based on air pollutant monitoring data and are determined for each air pollutant. Attainment status for a pollutant means that a given air district meets the standard set by the EPA and/or CARB.

Regional and Local

2017 Clean Air Plan

The Bay Area Air District (Air District) is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area. Regional air quality management districts, such as the Air District, must prepare air quality plans specifying how state and federal air quality standards will be met. The Air District's most recently adopted plan is the Bay Area 2017 Clean Air Plan (2017 CAP). The 2017 CAP focuses on two related Air District goals: protecting public health and protecting the climate. To protect public health, the 2017 CAP describes how the Air District will continue its progress toward attaining state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the 2017 CAP includes control measures designed to reduce emissions of methane and other super-greenhouse gases (GHGs) that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.³

CEQA Air Quality Guidelines

The Air District CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. Jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by the Air District within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, Air District rules, methods of analyzing impacts, and recommended mitigation measures.

³ The Air District. *Final 2017 Clean Air Plan*. April 19, 2017. <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.

Santa Clara General Plan

General Plan policies related to air quality that are applicable to the project include the following.

Policy	Description
5.10.2-G1	Improved air quality in Santa Clara and the region.
5.10.5-G2	Reduced greenhouse gas emissions that meet the State and regional goals and requirements to combat climate change.
5.10.5-P3	Encourage implementation of technological advances that minimize public health hazards and reduce the generation of air pollutants.
5.10.5-P4	Encourage measures to reduce greenhouse gas emissions to reach 30 percent below 1990 levels by 2020.
5.10.5-P6	Require “Best Management Practices” for construction dust abatement.

4.1.1.3 Existing Conditions

The Bay Area is considered a non-attainment area for ground-level O₃ and PM_{2.5} under both the federal Clean Air Act and state Clean Air Act. The area is also considered nonattainment for PM₁₀ under the state act, but not the federal act. The area has attained both state and federal ambient air quality standards for CO. As part of an effort to attain and maintain ambient air quality standards for O₃ and PM₁₀, the Air District has established thresholds of significance for these air pollutants and their precursors. These thresholds are for O₃ precursor pollutants (ROG and NO_x), PM₁₀, and PM_{2.5}, and apply to both construction period and operational period impacts.

Sensitive Receptors

The nearest sensitive receptors to the project site are located in the adjacent single-family houses north of the project site. Other receptors are found at further distances surrounding the project site including the Action Day Schools – Pruneridge, Stratford School, and Pacific Autism Center for Education, as well as residences to the south.

4.1.2 Impact Discussion

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project:					
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<hr/>					
a) Would the project conflict with or obstruct implementation of the applicable air quality plan?					

4.1.2.1 Findings of the Certified EIR

The approved project screened out of operational criteria air pollutant impacts based on Air District CEQA threshold guidance. Implementation of the project would not inhibit the Air District or partner agencies from continuing progress toward attaining state and federal air quality standards and eliminating health-risk disparities from exposure to air pollution among Bay Area communities, as described within the 2017 CAP.

4.1.2.2 Modified Project Analysis

While the addition of natural gas stovetops would increase overall emissions from the project, as described below, the proposed modified project would still screen out of the 2017 CAP and would still comply with the emissions thresholds and specifications of the 2017 CAP. The project would not result in new or more significant impact regarding compliance with the 2017 CAP. **[Same Impact as the Approved Project (Less than Significant Impact)]**

-
- b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?
-

4.1.2.3 Findings of the Certified EIR

The EIR found that the approved project would be screened out for operational criteria air pollutants under the 421-unit residential project screening size for residential developments and would have a less than significant impact for operational air quality impacts.

4.1.2.4 *Modified Project Analysis*

Operational Criteria Pollutants

The addition of 22 natural gas stovetops would result in an increase in operational criteria pollutants for the modified project. The modified project would increase all criteria pollutants by less than 0.05 tons per year and total annual emissions would not exceed 0.1 tons per year for energy use. Additionally, the proposed project would still be fewer than 421 units in size and would be below the screening size for operational criteria pollutants according to Air District CEQA threshold guidance.

The inclusion of the natural gas stovetops would not result in operational criteria air pollutant emissions exceeding the Air District thresholds. Therefore, the modified project would not result in new or more significant impacts from operational criteria pollutants. **[Same Impact as Approved Project (Less than Significant Impact)]**

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

4.1.2.5 *Findings of the Certified EIR*

Operational Community Risk Impacts

Operation of the approved project was determined to generate 207 daily trips dispersed on the roadway system, with a majority of the trips being from light-duty vehicles (i.e., passenger automobiles). Passenger automobiles and trucks are not significant sources of TACs because they are not primarily diesel vehicles. Therefore, operational emissions of TACs from the project would be negligible and would result in a less than significant impact.

4.1.2.6 *Modified Project Analysis*

Operational Community Risk Impacts

Stationary equipment that could emit substantial TACs (e.g., emergency generators) is not proposed as part of the project. Operation of the project would, however, have long-term emissions from mobile sources (i.e., traffic). The modified project would not increase the total number of daily traffic trips generated by the proposed development. The addition of 22 natural gas stovetops would not result in new TAC emissions and would not result in new or more significant community risk impacts. **[Same Impact as Approved Project (Less than Significant Impact)]**

-
- d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?
-

4.1.2.7 *Findings of the Certified EIR*

The approved project would introduce a residential development to the project site. During construction of the approved project, operation of construction vehicles may result in temporary odors related to fuel combustion, but these would be temporary and would not result in a significant impact. The development would not produce emissions which would create unpleasant odors for residents around the project site.

4.1.2.8 *Modified Project Analysis*

The addition of 22 natural gas stovetops would not result in new odors and would not result in new or more significant impacts from operational criteria pollutants. **[Same Impact as Approved Project (Less than Significant Impact)]**

4.2 Energy

The change to the 2024 approved residential project, relevant to energy impacts, is the addition of natural gas stovetops which would result in the consumption of natural gas on-site, which was not included in the approved project. The following analysis addresses the energy impacts that would result from operation of the modified project.

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

At the federal level, energy standards set by the EPA apply to numerous consumer products and appliances (e.g., the EnergyStar™ program). The EPA also sets fuel efficiency standards for automobiles and other modes of transportation.

Renewables Portfolio Standard Program

In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2010. Governor Schwarzenegger issued Executive Order (EO) S-3-05, requiring statewide emissions reductions to 80 percent below 1990 levels by 2050. In 2008, EO S-14-08 was signed into law, requiring retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. In October 2015, Governor Brown signed SB 350 to codify California's climate and clean energy goals. A key provision of SB 350 requires retail sellers and publicly owned utilities to procure 50 percent of their electricity from renewable sources by 2030. SB 100, passed in 2018, requires 100 percent of electricity in California to be provided by 100 percent renewable and carbon-free sources by 2045.

Executive Order B-55-18 To Achieve Carbon Neutrality

In September 2018, Governor Brown issued an executive order, EO-B-55-18 To Achieve Carbon Neutrality, setting a statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." The executive order requires CARB to "ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal." EO-B-55-18 supplements EO S-3-05 by requiring not only emissions reductions, but also that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO₂ from the atmosphere through sequestration.

California Building Standards Code (CBC)

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6 of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California’s energy consumption. Title 24 is updated approximately every three years.⁴ Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.⁵

California Green Building Standards Code

CALGreen establishes mandatory green building standards for buildings in California. CALGreen was developed to reduce GHG emissions from buildings, promote environmentally responsible and healthier places to live and work, reduce energy and water consumption, and respond to state environmental directives. CALGreen covers five categories: planning and design, energy efficiency, water efficiency and conservation, material and resource efficiency, and indoor environmental quality.

Local

Santa Clara General Plan

Energy-related General Plan policies applicable to the project are shown in the following table.

Policy	Description
5.10.3-P4	Encourage new development to incorporate sustainable building design, site planning and construction, including encouraging solar opportunities.
5.10.3-P5	Reduce energy consumption through sustainable construction practices, materials, and recycling.
5.10.3-P6	Promote sustainable buildings and land planning for all new development, including programs that reduce energy and water consumption in new development.

Santa Clara Reach Code

Reach Codes are local ordinances adopted by the local government that exceed and enhance the current version of state’s Energy and Green Building standards codes. By adopting the City Reach Code ordinance, the City of Santa Clara utilized this opportunity to not only meet local climate action goals to reduce greenhouse gas emissions, but also to achieve greater energy savings and accelerate decarbonization through the all-electric requirements.

⁴ California Building Standards Commission. “California Building Standards Code.” Accessed April 17, 2025. <https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo>.

⁵ California Energy Commission (CEC). “2022 Building Energy Efficiency Standards.” Accessed April 17, 2025. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>.

4.2.1.2 Existing Conditions

Total energy usage in California was approximately 6,854.4 trillion British thermal units (Btu) in the year 2022, the most recent year for which this data was available.⁶ Out of the 50 states, California is ranked second in total energy consumption and 49th in energy consumption per capita. The breakdown by sector was approximately 17.6 percent (1,203.9 trillion Btu) for residential uses, 17.4 percent (1,193.4 trillion Btu) for commercial uses, 22.5 percent (1,539.8 trillion Btu) for industrial uses, and 42.6 percent (2,917.3 trillion Btu) for transportation.⁷ This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

4.2.2 Impact Discussion

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project:					
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<hr/>					
a) Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?					

4.2.2.1 Findings of the Certified EIR

The approved project would construct a 22-unit residential development, which was determined to increase energy consumption on-site. Based on the design of the approved project, there would be no demand for natural gas on the project site. The approved project would be built according to California Building Code (CBC) and CALGreen Standards.

⁶ United States Energy Information Administration. "State Profile and Energy Estimates, 2022." Accessed March 21, 2025. <https://www.eia.gov/state/?sid=CA#tabs-2>.

⁷ United States Energy Information Administration. "State Profile and Energy Estimates, 2022." Accessed March 21, 2025. <https://www.eia.gov/state/?sid=CA#tabs-2>.

The 22 units were determined to create an energy demand of approximately 4,614 kilowatt hours per year (kWh/year) per dwelling unit. Therefore, the whole development was determined to result in energy consumption of approximately 101,508 kWh/year. This was found to be consistent with the General Plan designation for the project site of very low-density residential use and would not exceed the predicted energy consumption for the project site identified within the General Plan. Therefore, the development would not result in wasteful energy consumption and would not result in a potentially significant environmental impact due to inefficient or unnecessary consumption of energy resources during project operations.

4.2.2.2 *Modified Project Analysis*

The modified project would be constructed with 22 stovetops using natural gas. This would marginally decrease the electrical energy requirements of the approved project and would increase the natural gas consumption of the project by approximately 120,851,500 British Thermal Units (BTU) per year.⁸ Average energy consumption for an electrical stovetop range is approximately 720 kWh/year for a total of 15,840 kWh of electricity per year for the development.⁹ With the gas stovetops included in the modified project, the equivalent energy consumption associated with the stovetops would be 2,951 kWh/year for each unit and 31,395 kWh/year for the development. Consistent with the approved project, the modified project would be consistent with the General Plan designation for the project site of Very Low-Density Residential use. For this reason, the modified project would not exceed the predicted energy consumption for the project site identified within the General Plan. Furthermore, the project would still be required to meet all applicable energy efficiency standards for new construction. Therefore, the modified project would not result in new or more significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project operations. **[Same Impact as Approved Project (Less than Significant Impact)]**

-
- b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?
-

4.2.2.3 *Findings of the Certified EIR*

The approved project was not found to result in a substantial energy increase because it would be consistent with the General Plan land use designation for the site. The General Plan determined that development consistent with land use designations would not result in conflicts with energy plans or State energy policy. Additionally, the approved project would result in a small overall contribution to the Santa Clara County (County) energy consumption, and would implement energy efficiency standards consistent with the CBC and CALGreen. Therefore, the approved project was found to comply with state and local plans for renewable energy and energy efficiency.

⁸ 5,493,250 BTU per year x 22 ranges = 120,851,500 BTU per year = 35,418 kWh/year.

Illingworth & Rodkin, Inc. 1957 Pruneridge Avenue Residential Project Greenhouse Gas Assessment. March 21, 2025.

⁹ Silicon Valley Power. Appliance Energy Use Chart. Accessed September 26, 2024.

[https://www.siliconvalleypower.com/residents/save-energy/appliance-energy-use-chart#:~:text=Portable%20heater%20\(1500W\).](https://www.siliconvalleypower.com/residents/save-energy/appliance-energy-use-chart#:~:text=Portable%20heater%20(1500W).)

4.2.2.4 *Modified Project Analysis*

Consistent with the approved project, the modified project would result in a similarly small overall contribution to County energy consumption. The modified project would also be required to comply with the CBC and CalGreen standards. The inclusion of natural gas stovetops would not result in inconsistency with these state energy plans and the modified project would continue to be consistent with the General Plan land use designation for the site. Therefore, the modified project would not result in new or more significant impacts due to conflicts with State or local energy plans. **[Same Impact as Approved Project (Less than Significant Impact)]**

4.3 Greenhouse Gas Emissions

The changes to the 2024 approved project relevant to GHG emissions are the addition of 22 natural gas stovetops on-site. The following analysis addresses the operational GHG impacts that would result from implementation of the modified project with the use of natural gas stovetops.

Information in this section is based on an analysis by Illingworth & Rodkin, included in Appendix A.

4.3.1 Environmental Setting

4.3.1.1 *Background Information*

Gases that trap heat in the atmosphere, GHGs, regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. In GHG emission inventories, the weight of each gas is multiplied by its global warming potential (GWP) and is measured in units of CO₂ equivalents (CO₂e). The most common GHGs are carbon dioxide (CO₂) and water vapor but there are also several others, most importantly methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). These are released into the earth's atmosphere through a variety of natural processes and human activities. Sources of GHGs are generally as follows:

- CO₂ and N₂O are byproducts of fossil fuel combustion.
- N₂O is associated with agricultural operations such as fertilization of crops.
- CH₄ is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations.
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents, but their production has been stopped by international treaty.
- HFCs are now used as a substitute for CFCs in refrigeration and cooling.
- PFCs and SF₆ emissions are commonly created by industries such as aluminum production and semiconductor manufacturing.

An expanding body of scientific research supports the theory that global climate change is currently causing changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. The climate and several naturally occurring resources within California are adversely affected by the global warming trend. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and/or loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes and drought; and increased levels of air pollution.

4.3.1.2 *Regulatory Framework*

State

Assembly Bill 32

Under the California Global Warming Solutions Act, also known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources.

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to express the 2030 statewide target in terms of million metric tons of CO₂E (MMTCO₂e). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 MMTCO₂e.

Senate Bill 375

SB 375, known as the Sustainable Communities Strategy and Climate Protection Act, was signed into law in September 2008. SB 375 builds upon AB 32 by requiring CARB to develop regional GHG reduction targets for automobile and light truck sectors for 2020 and 2035. The per-capita GHG emissions reduction targets for passenger vehicles in the San Francisco Bay Area include a seven percent reduction by 2020 and a 15 percent reduction by 2035.

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with the Association of Bay Area Governments (ABAG), the Air District, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2040. Plan Bay Area 2040 establishes a course for reducing per-capita GHG emissions through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).

Regional and Local

2017 Clean Air Plan

To protect the climate, the 2017 CAP (prepared by the Air District) includes control measures designed to reduce emissions of methane and other super-GHGs that are potent climate pollutants in the near-term, and to decrease emissions of CO₂ by reducing fossil fuel combustion.

CEQA Air Quality Guidelines

The Air District CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. The

jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing GHG impacts developed by the Air District within the CEQA Air Quality Guidelines. The guidelines include information on legal requirements, Air District rules, methods of analyzing impacts, and recommended mitigation measures.

Santa Clara General Plan

General Plan goals and policies related to GHG emissions from the project include the following.

Policies	Description
5.3.1-P10	Provide opportunities for increased landscaping and trees in the community, including requirements for new development to provide street trees and a minimum 2:1 on- or off-site replacement for trees removed as part of the proposal to help increase the urban forest and minimize the heat island effect.
5.8.5-P1	Require new development and City employees to implement transportation demand management (TDM) programs that can include site-design measures, including preferred carpool and vanpool parking, enhanced pedestrian access, bicycle storage and recreational facilities.
5.8.5-P5	Encourage TDM programs that provide incentives for the use of alternative travel modes to reduce the use of single-occupant vehicles.
5.10.2-G2	Reduced greenhouse gas emissions that meet the State and regional goals and requirements to combat climate change.
5.10.2-P2	Encourage development patterns that reduce vehicle miles traveled and air pollution.
5.10.2-P3	Encourage implementation of technological advances that minimize public health hazards and reduce the generation of air pollutants.

City of Santa Clara Climate Action Plan

The City of Santa Clara Climate Action Plan 2022 (2022 CAP) is the latest update to the City’s CAP and is designed to meet the statewide GHG reduction targets for 2030 set by Senate Bill 32. As a Qualified Climate Action Plan, the 2022 CAP allows for tiering and streamlining of GHG analyses under CEQA. The 2022 CAP identifies existing City policies and regulations as well as new measures to be implemented by development projects in the areas of building/energy use, transportation and land use, materials and consumption, natural resources and water resources, and community resilience & wellbeing. Projects that comply with the policies and strategies outlined in the 2022 CAP would have a less than significant GHG impact.

Silicon Valley Power

Silicon Valley Power (SVP) is the City of Santa Clara’s energy utility and would provide electricity service to the project site. Starting in January 2018, SVP provides residential customers with carbon-free power as their standard, default power supply. This means the power generation produces no net carbon emissions. For commercial customers, SVP offers several options for participation in green energy programs, including a carbon-free energy option.¹⁰

¹⁰ Silicon Valley Power. “Carbon-Free FAQ.” Accessed April 17, 2025. <https://www.siliconvalleypower.com/svp-and-community/about-svp/faqs/carbon-free-faq>.

4.3.1.3 Existing Conditions

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth and changes in weather patterns. The existing project site is vacant (the previous church, which is not in use at the time the EIR was prepared, has been demolished) and does not currently produce GHG emissions.

4.3.2 Impact Discussion

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project:					
a) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>					
a) Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?					

4.3.2.1 Findings of the Certified EIR

Per CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Lead Agency and must be based to the extent possible on scientific and factual data. The approved project was part of planned growth from build out of the General Plan FEIR and would comply with all applicable 2022 CAP actions. Therefore, the approved project was found to result in a less than significant operational GHG emissions impact.

4.3.2.2 Modified Project Analysis

The approved project would have utilized all-electric appliances, and power supplied to residential developments from Silicon Valley Power utilizes zero-carbon sources. The modified project would utilize GHG emitting sources of energy (natural gas) for the stovetop ranges.

The approved project was estimated to generate 119 tons of CO₂ equivalent GHG emissions per year from traffic trips to and from the site and 10 tons from other utilities consumption, for approximately 129 tons in total. Based on the analysis provided in Appendix A, the stovetop ranges of the modified project would result in approximately 6.6 tons of carbon dioxide (CO₂) equivalent GHG emissions per year. As a result, total GHG emissions for the modified project would be 135 tons of CO₂ equivalent GHG emissions (automobile trips plus cooktops plus other constant emissions) per year.

To evaluate whether the new greenhouse gas emissions will have a significant effect on the environment, the Air District directs local agencies to consider whether a project (a) meets certain design elements or (b) is consistent with a local GHG reduction strategy that meets the criteria of CEQA Guidelines Section 15183.5(b). For threshold (a), one of the required design elements is that the project will not include natural appliances or natural gas plumbing. Given that the purpose of the proposed amendment is to allow the project to do both of those things, the project does not meet the design elements under the first Air District threshold. For the second threshold, the addition of natural gas infrastructure into the project is not consistent with the 2022 Climate Action Plan (CAP), which establishes a policy of reducing emissions to “net zero” by 2045 for the City of Santa Clara. “Net zero” energy use is based on the assumption that all new development in the City would be all-electric, and that eventually all energy used in the City would be from renewable resources.

Since the modified project includes natural gas stovetops, it would not be consistent with the City’s 2022 CAP, and would increase overall GHG emissions compared to the approved project, the modified project would result in a significant impact.

Impact GHG-1 The modified project would use natural gas which would contribute to greenhouse gas emissions, in conflict with the 2022 Climate Action Plan.

To reduce the impact associated with GHG emissions, the modified project would be required to implement the following Mitigation Measure.

Mitigation Measure

MM GHG-1.1 To reduce GHG emissions equal to or less than the approved project, the project would be required to offset the emissions calculated for the cooktops. Based on the calculations by Illingworth & Rodkin, Hexagon Transportation Consultants calculated an equivalency between automobile trips and the emissions of the cooktops. That equivalency is nine daily automotive trips.

Prior to approval of building permits, the modified project will prepare a Trip Demand Management (TDM) Plan with measures reducing the number of vehicle trips by a minimum of 5.5 percent (equivalent to approximately nine daily trips). The TDM plan will be prepared by a qualified transportation

consultant and reviewed by the City of Santa Clara Department of Public Works and approved by the City's Director of Community Development or the Director's designee prior to the approval of building permits.

Through inclusion of this mitigation measure, the modified project would offset the 6.6 tons of GHG emissions resulting from the use of natural gas by reducing GHG emissions from project related transportation emissions. With implementation of this mitigation measure, the modified project would not result in a net increase in GHG emissions compared to the approved project. Therefore, the operational GHG emissions of the modified project would not result in new or more significant operational impacts with MM GHG-1.1. **(New Less than Significant Impact with Mitigation Incorporated)**

-
- b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?
-

4.3.2.3 *Findings of the Certified EIR*

The approved project was determined to be consistent with the 2017 Climate Action Plan because it was consistent with the Air District CEQA Air Quality Guidelines screening size of 421 single-family houses for operational criteria pollutants.

The approved project was found to comply with the City's Reach Code by constructing all-electric buildings. The project would be required to be built in accordance with the most recent CALGreen requirements. Additionally, the approved project would comply with SB 1383 and would be consistent with the Pedestrian and Bicycle Master Plans.

The approved project included transit-oriented measures such as providing bicycle parking and on-site amenities, such as rideshare parking, and construction of a paseo connecting to the sidewalk, in compliance with Actions T-3-1 and T-3-3. The approved project would demolish the church complex buildings on-site and would reuse some of the stained glass windows for other church facilities elsewhere, if feasible; therefore, the approved project was consistent with Action M-3-1. Therefore, the approved project was not found to be in conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

4.3.2.4 *Modified Project Analysis*

The approved project was determined to be consistent with the 2017 Climate Action Plan because it was consistent with the Air District CEQA Air Quality Guidelines screening size of 421 single-family housing units for operational criteria pollutants. The modified project would not result in an exceedance of this threshold and, therefore, the modified project would continue to be consistent with the guidelines in the 2017 Climate Action Plan.

The modified project would conflict with General Plan goals and policies intended to address air quality and climate change. General Plan Goal 5.10.2-G2 is to achieve reduced greenhouse gas

emissions that meet State and regional goals and requirements to combat climate change, and the proposed modifications would increase emissions compared to the approved project. General Plan policy 5.10.2-P3 encourages the implementation of technological advances that minimize public health hazards and reduces the generation of air pollutants, and the proposed modifications would forego all-electric construction and instead utilize outdated methane technology to generate heat for cooking. And as stated above, the inclusion of natural appliances and natural gas plumbing conflicts with Air District thresholds and the City's 2022 CAP goal of reducing emissions to "net zero" by 2045.

As such, the modified project conflicts with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs. Nevertheless, the modified project will implement MM GHG-1.1 to reduce GHG emissions resulting from project traffic trips to offset the natural gas emissions from the stovetops and, therefore, would not frustrate the CAP's "net zero" objectives. Moreover, the proposed mitigation measure promotes several other General Plan policies, such as 5.8.5-P1, which requires new developments to implement TDM programs, and 5.8.5-P5, which encourages TDM programs that provide incentives for the use of alternate travel modes. Therefore, with the inclusion of the mitigation measure, the modified project would not result in new or more significant impacts from inconsistencies with adopted plans, policies, or regulations. **(New Less than Significant Impact with Mitigation Incorporated)**

4.4 Land Use and Planning

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Santa Clara General Plan

The following land use related General Plan policies are applicable to the modified project.

Policies	Description
5.3.1-P9	Require new development provide adequate public services and facilities, infrastructure, and amenities to serve the new employment or residential growth.
5.3.2-P1	Encourage the annual construction of the housing units necessary to meet the City's regional housing needs assessment by reducing constraints to housing finance and development.
5.3.2-P6	Provide adequate choices for housing tenure, type and location, including higher density, and affordability for low- and moderate-income and special needs household.
5.4.1-P9	Residential development should include front doors, windows, stoops, porches, and bay windows or balconies along street frontages.
5.5.2-P12	Screen loading and trash areas to preclude visibility from off-site and public streets.

City of Santa Clara Zoning Code

The City's Zoning Code regulates land uses within the boundaries of Santa Clara. The overall goals of the Zoning Code are to promote the city's growth in an orderly manner and to promote and protect the public health, safety, peace, comfort, and general welfare in conformance with the General Plan. For each of the zoning districts in the city, the Code identifies land uses that are permitted, conditionally permitted, and not permitted. It also establishes standards such as minimum lot size, maximum building height, and the minimum distance buildings must be set back from the street. Provisions for parking, landscaping, lighting, and other rules that guide the development of projects in the city are also included.

4.4.1.2 *Existing Conditions*

The project site was developed with a church and an associated office/school building. Since the approval of the original project, the previous buildings on-site have been demolished. The site has a General Plan land use designation of Very Low Density Residential and is zoned PD.

The land uses around the project site include a mix of residential, office, and commercial uses. An office use is located directly west of the project site, a commercial shopping center is located directly east of the site, and residential uses are located north and south of the site. There is also a neighborhood of single-family residences west of the project site beyond the office use.

4.4.2 Impact Discussion

For the purpose of determining the significance of the project’s impact on land use and planning, would the project:

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project:					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) Would the project physically divide an established community?

4.4.2.1 Findings of the Certified EIR

The approved project was determined to not result in impacts from division of an established community.

4.4.2.2 Modified Project Analysis

The addition of 22 natural gas stovetops would not result in new or more significant impacts from the division of an established community. **[Same Impact as Approved Project (Less than Significant Impact)]**

b) Would the project 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?

4.4.2.3 Findings of the Certified EIR

Zoning Code

The approved project is consistent with the General Plan designation and would be reviewed for consistency with the new zoning designation to ensure that the project would be designed in a manner that is compatible with the architectural character and quality of the surrounding neighborhood, consistent with Zoning Code requirements. Therefore, the project was not found to cause a significant environmental impact due to a conflict with the General Plan or Zoning Code.

2022 Climate Action Plan

In June 2022, the City of Santa Clara adopted the updated 2022 CAP. As a Qualified Climate Action Plan, the 2022 CAP allows for tiering and streamlining of GHG analyses under CEQA through the year 2030. The approved project was found to be consistent with the 2022 CAP.

Therefore, the approved project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

The approved project would not conflict or otherwise interfere with the statewide GHG reduction measures identified in CARB's Scoping Plan nor would the project conflict with SB 100 goals. Specifically, the proposed buildings would be constructed in conformance with CALGreen and the Title 24 Building Code, which requires high-efficiency water fixtures, water-efficient irrigation systems, and compliance with current energy efficiency standards. Therefore, the approved project would result in a less than significant impact.

4.4.2.4 *Modified Project Analysis*

The modified project would add 22 natural gas stovetops to the project with no other changes proposed to the design. The addition of natural gas infrastructure into the project is not consistent with the 2022 CAP, which establishes a policy of reducing emissions to "net zero" by 2045 in the City of Santa Clara. "Net zero" energy use is based on the assumption that all new development in the City would be all-electric, and that eventually all energy used in the City would be from renewable resources. The modified project would also conflict with General Plan Goal 5.10.2-G2, which aims for reduced greenhouse gas emissions that meet State and regional goals and requirements to combat climate change, and Policy 5.10.2-P3, which encourages the implementation of technological advances that minimize public health hazards and reduces the generation of air pollutants. Here, the proposed modifications would increase emissions compared to the approved project and would forego all-electric construction and instead utilize outdated methane technology to generate heat for cooking.

The modified project would include a TDM plan as part of Mitigation Measure GHG-1.1, which would reduce the number of project trips to an extent that GHG emissions from the natural gas stovetops are evenly offset. Through inclusion of the Mitigation Measure, the modified project would have no net increase in GHG emissions, compared to the approved project, and would be consistent with the intent of the 2022 CAP. Moreover, the proposed mitigation measure promotes General Plan Policy 5.8.5-P1, which requires new developments to implement TDM programs, and Policy 5.8.5-P5, which encourages TDM programs that provide incentives for the use of alternate travel modes. Therefore, despite the conflicts with the CAP and General Plan goals and policies, the modified project would result in a new less than significant land use impact with mitigation incorporated. **(New Less than Significant Impact with Mitigation Incorporated)**

4.5 Transportation

The information in this section is based in part on the Transportation Demand Management memo completed by Hexagon Transportation Consultants, Inc. on April 16, 2025. This is included for reference as Appendix B of this report.

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

State

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires analysis of VMT in determining the significance of transportation impacts. Local jurisdictions were required by Governor's Office of Planning and Research (OPR) to implement a VMT policy by July 1, 2020.

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.50 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

Regional and Local

Congestion Management Program

The Santa Clara Valley Transportation Agency (VTA) oversees the Congestion Management Program (CMP), which is aimed at reducing regional traffic congestion. The relevant state legislation requires that urbanized counties in California prepare a CMP in order to obtain each county's share of gas tax revenues. State legislation requires that each CMP define traffic LOS standards, transit service standards, a trip reduction and TDM plan, a land use impact analysis program, and a capital improvement element. VTA has review responsibility for proposed development projects that are expected to affect CMP-designated intersections.

City of Santa Clara VMT Policy

The Santa Clara City Council adopted a VMT policy in compliance with SB 743 on June 23, 2020. The policy sets thresholds of significance for various land uses, using the countywide average VMT as the environmental baseline. To determine whether a project will have a significant transportation impact, project VMT is compared to the appropriate threshold. For residential land uses, the

adopted threshold is 15 percent below the existing countywide VMT per capita. For employment uses, the adopted threshold is 15 percent below the existing countywide VMT per employee. For retail uses, the threshold is the existing countywide VMT for retail uses.

In addition to establishing the environmental baseline and thresholds of significance, the VMT policy establishes screening criteria for certain projects that are presumed to have a less than significant VMT impact. Projects which meet the screening criteria would not be required to quantify VMT and compare it to the City's adopted threshold. Projects which generate less than 110 daily vehicle trips or less would be screened out from a quantitative VMT analysis and would be presumed to have a less than significant VMT impact. Retail land uses providing 50,000 square feet or less would be presumed to be less than significant. Transit supportive projects which are located within ½-mile of an existing major transit stop or an existing transit stop along a High Quality Transit Corridor would also be presumed to be less than significant, provided that a minimum density of 35 units/acre is met for residential projects, a minimum FAR of 0.75 is met for office/R&D projects, no excess parking is provided, and no affordable dwelling units are replaced.

All proposed projects are required to undergo environmental review as part of the approval process. This includes an analysis of CEQA impacts (VMT) and non CEQA operational measures of intersection efficiency (LOS). The City's VMT policy also establishes LOS as an operational measure of intersection efficiency, which is not defined as transportation environmental impact per CEQA.

City of Santa Clara Bicycle Plan

The City of Santa Clara Final Bicycle Plan Update (2018) provides a bikeway planning and design tool, which contains the policy vision, design guidance, and specific recommendations to guide public and private investments in active transportation bicycle facilities and related programs.

City of Santa Clara Pedestrian Master Plan

The Pedestrian Master Plan, approved February 25, 2020, is a forward-looking plan to capture the benefits of walking as the City anticipates growth and redevelopment. The plan establishes methods for safe, comfortable, convenient, active, and implementable goals to improve walkability and establish zones for improved pedestrian development.

4.5.1.2 *Existing Conditions*

The project site is located approximately 350 feet west of the Pruneridge Avenue and Winchester Boulevard intersection. East of the intersection, Pruneridge Avenue becomes West Hedding Street. Regional access to the project site is provided by San Tomas Expressway, I-880, and I-280 which are west, east, and south of the project site respectively. These regional roadways connect to Pruneridge Avenue, Winchester Boulevard, and West Hedding Street which provide access to local streets around the project site. The existing site is accessible via two driveways located on Pruneridge Avenue.

Bicycle Facilities

There are north-south oriented bicycle lanes west of the project site on Los Padres Boulevard and east-west oriented bicycle lanes east of Winchester Boulevard on West Hedding Street. According to the 2018 City of Santa Clara Final Bicycle Plan Update, Class II buffered bicycle lanes are planned on Pruneridge Avenue that would connect the project site to other existing bicycle facilities on Los Padres Boulevard and West Hedding Street.¹¹

Pedestrian Facilities

Pedestrian facilities near the project site consist of sidewalks and crosswalks. A continuous network of sidewalks is present along all surrounding streets. Crosswalks with pedestrian signals are located at all signalized intersections in the project vicinity. Crosswalks and curb ramps are present at each corner of the Winchester Avenue and Pruneridge Avenue intersection; however, the curb ramp located on the southwest corner of the intersection does not include truncated dome tiles that are used to assist visually impaired pedestrians.

Transit Services

VTA Frequent Route 60, which has a headway of 15 minutes during the morning and evening peak hours, runs along Winchester Boulevard. The nearest bus stop to the project site served by this route is approximately 500 feet northeast, at the intersection of Woodland Avenue and Winchester Boulevard.

4.5.2 Impact Discussion

	New Potentially Significant Impact	New Less than Significant with Mitigation Incorporated	New Less than Significant Impact	Same Impact as Approved Project	Less Impact than Approved Project
Would the project:					
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

¹¹ City of Santa Clara. *Bicycle Plan Update 2018 - High-Priority Recommendations & Existing Bikeways*. Page 64.

-
- a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?
-

4.5.2.1 *Findings of the Certified EIR*

The approved project determined that the number of vehicles entering/exiting the site at any time would be minimal and would not disrupt traffic flow. In addition, the approved project would not alter the roadway circulation network in the surrounding area.

The approved project would not remove these existing bicycle facilities or interfere with the future installation of the Class II buffered bicycle lane improvements along Pruneridge Avenue identified in the 2018 City of Santa Clara Final Bicycle Plan Update.

The approved project would not construct any new public pedestrian facilities or alter any existing facilities.

Based on the proximity of VTA Frequent Route 60 to the project site, it is assumed that some residents would utilize existing transit services. As discussed in the approved EIR, the project would increase the population on-site by approximately 58 people. Although this could result in a slight increase in demand for transit services, this increase is not substantial and would be accommodated by existing transit facilities. Therefore, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities.

4.5.2.2 *Modified Project Analysis*

As discussed in Section 4.3.2.2, the modified project would be required to include a TDM plan which would reduce the number of trips from the project site and would improve bicycle and pedestrian options for the project. Therefore, the approved project would not result in new or more significant impacts on the local circulation systems surrounding the project site. **[Same Impact as Approved Project (Less than Significant Impact)]**

-
- b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
-

4.5.2.3 *Findings of the Certified EIR*

Based on the estimate generated by the countywide VMT Evaluation Tool, the residential uses surrounding the project site would have a VMT of 8.85 per capita. Because the development of residential units on-site would increase residential density and diversity in the vicinity, the project would result in a lower VMT per capita compared to the surrounding residential uses. The project-

level VMT is lower than the 11.33 VMT per capita threshold. Therefore, the project would result in a less than significant impact on the transportation system based on the City's VMT impact criteria.

4.5.2.4 *Modified Project Analysis*

The modified project would be required to include a TDM plan to reduce the number of trips associated with the project. Therefore, the modified project would result in fewer trips than the approved project and would have a lower VMT impact than the approved project. **[Same Impact as Approved Project (Less than Significant Impact)]**

-
- c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
-

4.5.2.5 *Findings of the Certified EIR*

Based on the relatively low number of project-generated trips estimated on-site, significant operational issues related to vehicle queueing and vehicle delay would not occur at the driveway for vehicles entering or exiting the site. The project would not alter the geometric design of the roadways surrounding the project site and would not substantially change circulation of vehicles on the project site. In addition, the project would comply with design requirements as outlined in the City Code.

4.5.2.6 *Modified Project Analysis*

The addition of 22 natural gas stovetops would not result in new site geometric design hazards. Therefore, the modified project would not result in new or more significant circulation impacts at the project site. **[Same Impact as Approved Project (Less than Significant Impact)]**

-
- d) Would the project result in inadequate emergency access?
-

4.5.2.7 *Findings of the Certified EIR*

Emergency vehicle access to the project site would be provided via the one new, two-way driveway located on Pruneridge Avenue. The approved development would be reviewed for consistency with applicable CBC and Fire Code requirements for access and safety in addition to the site design requirements outlined in Chapter 18.74 of the Santa Clara City Code. Therefore, the approved project was determined to have a less than significant emergency access impact.

4.5.2.8 *Modified Project Analysis*

The addition of 22 natural gas stovetops would not result in changes to the emergency access on-site and would not result in new or more significant impacts. **[Same Impact as Approved Project (Less than Significant Impact)]**

Section 5.0 References

The analysis in this Initial Study is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

CalEEMod. Emission Factors and Data Tables: Appendix C. Accessed May 24, 2023.

https://www.caleemod.com/documents/handbook/appendices/appendix_c.pdf.

American Gas Association. Gas Facts: Appliance and Housing Data. Accessed September 26, 2024.

<https://www.aga.org/wp-content/uploads/2023/01/Section10Divider.pdf>.

Illingworth & Rodkin, Inc. 1957 Pruneridge Avenue Residential Project Greenhouse Gas Assessment. March 21, 2025.

Hexagon Transportation Consultants. Analysis of TDM Measures for the Proposed Residential Development at 1957 Pruneridge Avenue in Santa Clara, California. April 16, 2025.

Silicon Valley Power. Appliance Energy Use Chart. Accessed September 26, 2024.

[https://www.siliconvalleypower.com/residents/save-energy/appliance-energy-use-chart#:~:text=Portable%20heater%20\(1500W\)](https://www.siliconvalleypower.com/residents/save-energy/appliance-energy-use-chart#:~:text=Portable%20heater%20(1500W)).

Section 6.0 Lead Agency and Consultants

6.1 Lead Agency

City of Santa Clara

Department of Planning and Development

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Nimisha Agrawal, Senior Planner

6.2 Consultants

David J. Powers & Associates, Inc.

Environmental Consultants and Planners

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Patrick Kallas, Project Manager