

Final Environmental Impact Report
University Station Residential Project
SCH# 2025050963

Prepared by



In Consultation with



August 2026

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Appendix A: Draft EIR Comment Letters

Section 1.0 Introduction

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (Final EIR) for the University Station Residential project.

1.1 Purpose of the Final EIR

In conformance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, this Final EIR provides objective information regarding the environmental consequences of the proposed project. The Final EIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The Final EIR is intended to be used by the City and any Responsible Agencies in making decisions regarding the project.

Pursuant to CEQA Guidelines Section 15090(a), prior to approving a project, the lead agency shall certify that:

- (1) The Final EIR has been completed in compliance with CEQA;
- (2) The Final EIR was presented to the decision-making body of the lead agency, and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project; and
- (3) The Final EIR reflects the lead agency's independent judgment and analysis.

1.2 Contents of the Final EIR

CEQA Guidelines Section 15132 specify that the Final EIR shall consist of:

- a) The Draft EIR or a revision of the Draft;
- b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR;
- d) The Lead Agency's responses to significant environmental points raised in the review and consultation process; and
- e) Any other information added by the Lead Agency.

1.3 Public Review

In accordance with CEQA and the CEQA Guidelines (Public Resources Code Section 21092.5[a] and CEQA Guidelines Section 15088[b]), the City shall provide a written response to a public agency on comments made by that public agency at least 10 days prior to certifying the EIR. The Final EIR and all documents referenced in the Final EIR are available for public review at 1500 Warburton Avenue, Santa Clara, CA 95050, on weekdays during normal business hours. The Final EIR is also available for review on the City's website:

<https://www.santaclaraca.gov/Home/Components/BusinessDirectory/BusinessDirectory/614/15209>

Section 2.0 Draft EIR Public Review Summary

The Draft EIR for the University Station Residential project, dated April 2026, was circulated to affected public agencies and interested parties for a 45-day review period from April 10, 2026 through May 25, 2026. The City undertook the following actions to inform the public of the availability of the Draft EIR:

- A Notice of Availability of Draft EIR was published on the City's website (<https://www.santaclaraca.gov/Home/Components/BusinessDirectory/BusinessDirectory/614/15209>);
- Notification of the availability of the Draft EIR was mailed to project-area residents and other members of the public who had indicated interest in the project;
- The Draft EIR was delivered to the State Clearinghouse on April 8, 2026, as well as sent to various governmental agencies, organizations, businesses, and individuals (see Section 3.0 for a list of agencies, organizations, businesses, and individuals that received the Draft EIR); and
- Copies of the Draft EIR were made available on the City's website (<https://www.santaclaraca.gov/Home/Components/BusinessDirectory/BusinessDirectory/614/15209>), at the City Hall Permit Center (1500 Warburton Avenue), and at the Santa Clara Central Park Library (2635 Homestead Road).

Section 3.0 Draft EIR Recipients

CEQA Guidelines Section 15086 requires that a local lead agency consult with and request comments on the Draft EIR prepared for a project of this type from responsible agencies (government agencies that must approve or permit some aspect of the project), trustee agencies for resources affected by the project, adjacent cities and counties, and transportation planning agencies.

The NOA for the Draft EIR was sent to owners and occupants adjacent to the project site and to adjacent jurisdictions. The following agencies received a copy of the Draft EIR from the City or via the State Clearinghouse:

- Adams Broadwell Joseph & Cardozo
- Amah Mutsun Land Trust
- Association of Bay Area Governments
- Bay Area Air District
- Bay Area Council
- Campbell Union School District
- Campbell Union High School District
- City of Cupertino
- City of San José
- City of Sunnyvale
- County of Santa Clara
- Cupertino Union School District
- Fremont Union High School District
- Local Agency Formation Commission of Santa Clara County
- Lozeau Drury LLP
- Old Quad Residents Association
- San Francisco Public Utilities Commission
- Santa Clara Unified School District
- Santa Clara Valley Transportation Authority
- Santa Clara Valley Water District
- U.S. Department of Housing and Urban Development
- U.S. Department of Transportation
- U.S. Department of Transportation (FAA)
- U.S. Environmental Protection Agency
- West Valley-Mission College District

Section 4.0 Responses to Draft EIR Comments

In accordance with CEQA Guidelines Section 15088, this document includes written responses to comments received by the City of Santa Clara on the Draft EIR.

Comments are organized under headings containing the source of the letter and its date. The specific comments from each of the letters and/or emails are presented with each response to that specific comment directly following. Copies of the letters and emails received by the City of Santa Clara are included in their entirety in Appendix A of this document. Comments received on the Draft EIR are listed below.

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Federal and State Agencies

A. California Department of Transportation (dated May 20, 2026)

Comment A.1: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the University Station Residential Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the April 2026 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding

The project proposes to demolish the four existing office buildings and two parking garages to construct a new five-story building with up to 297 multi-family residential units and up to 111 three-story townhome units distributed amongst 26 buildings. The multi-family residential building will be constructed directly adjacent to State Route (SR) 82 and work impacting the sidewalks on SR 82 along the project frontage is proposed.

Response A.1: This comment accurately describes the proposed project. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.2: Travel Demand Analysis

The project vehicle miles traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the City of Santa Clara's adopted VMT Transportation Analysis Policy as well as the City of San José's 2023 Transportation Analysis Handbook. Per the DEIR, this transit supportive project is found to have a less than significant VMT impact, therefore working towards meeting the State's VMT reduction goals.

Response A.2: This comment is acknowledged. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.3: Design

Per the DEIR, the existing sidewalks adjacent to the multi-family residential building frontage along SR 82 and the existing segments for sidewalks adjacent to the driveway entrances to the project site would be reconstructed and made to conform with the existing curb and gutter lines along SR 82, Franklin Street, and Campbell Ave. Street trees will also be planted along the project frontage on SR 82.

All proposed work within Caltrans Right-of-Way (ROW) requires a Caltrans-issued Encroachment Permit. Information about the permit application process is included in the Encroachment Permit section of this letter. Please also be advised that a maintenance agreement for the modifications within Caltrans ROW shall be discussed with the Caltrans District 4 Division of Maintenance during the encroachment permit application stage.

Response A.3: If construction activities will occur in Caltrans ROW, the project applicant would coordinate with Caltrans' Office of Encroachment Permits as needed to obtain the appropriate Encroachment Permit. The City will include a condition of approval in the findings report for all requested entitlements for the project to obtain the appropriate Encroachment Permit from Caltrans' Office of Encroachment Permits, if needed. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.4: The proposed pedestrian pathway along SR 82 must replicate, to the maximum extent feasible, the characteristics of the existing pathway. Please also ensure that any Caltrans facilities impacted by the project meet Americans with Disabilities Act (ADA) Standards after project completion.

Response A.4: The project would maintain the existing access points to El Camino Real (SR 82), Franklin Street, and Campbell Avenue. As noted on page 172 of the Draft EIR, the existing sidewalks adjacent to the frontage along El Camino Real and the existing segments of sidewalks adjacent to the driveway entrances to the project site would be temporarily disrupted. These segments would be reconstructed and made to conform with the existing curb and gutter lines along El Camino Real, Franklin Street, and Campbell Avenue. Consistent with existing Federal and State requirements, the pedestrian facilities would be constructed in compliance with ADA standards. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.5: Furthermore, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users. Sidewalk and driveway design within Caltrans ROW shall comply with Caltrans Design Information Bulletin (DIB) 82-06 on Pedestrian Accessibility Guidelines for Highway Projects ([link](#)). Please also see Caltrans Standard Plans T30-34 ([link](#)) for specific pedestrian temporary control alternatives.

Response A.5: Details regarding construction logistics for the proposed project have not been prepared at this stage of the development process; however, the project would comply with Caltrans requirements regarding maintenance of bicycle and pedestrian access on El Camino Real during construction activities at the site. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.6: Hydrology

Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Any floodplain impacts must be documented and mitigated.

Response A.6: As discussed on pages 121 to 125 of the Draft EIR, the project would increase the amount of pervious surface area on-site by approximately 28,322 square feet (or six percent) which would result in a corresponding reduction in the amount of surface runoff compared to existing conditions. In addition, the project would construct approximately 15,483 square feet of bioretention areas on-site, and stormwater runoff would be directed to these treatment areas to facilitate on-site percolation and reduce the amount of stormwater runoff entering the City's infrastructure.

Comment A.7: During the encroachment permit application stage, please include a Hydraulics Report as part of the permit application package. The report should address how the existing SR 82 drainage system would be impacted by the project, include pre- and post-construction surface runoff flows, and discuss whether any mitigation is necessary.

Response A.7: As noted in Response A.3 above, the project applicant would coordinate with Caltrans' Office of Encroachment Permits as needed to obtain the appropriate Encroachment Permit if construction activities will occur in Caltrans ROW. This would include submittal of all necessary materials, including a Hydraulics Report, to obtain the Encroachment Permit. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.8: Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Response A.8: Details regarding construction logistics for the proposed project have not been prepared at this stage of the development process; however, the project would comply with Caltrans requirements regarding the need for a transportation permit if oversized or excessive load vehicles are required to transport materials on State roadways. In addition, the project applicant would coordinate with Caltrans to develop a Transportation Management Plan, if required by Caltrans. For additional discussion regarding project impacts on traffic operations on El Camino Real, see the discussion included under checklist question c) on pages 171 to 176 of the Draft EIR.

The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.9: Project Coordination

This proposed project will require coordination with the Central Bikeway Project. This project, led by the Santa Clara Valley Transportation Authority (VTA) in partnership with the City of Santa Clara, the City of San José, the County of Santa Clara, and Caltrans, is developing a 10.8-mile Class IV separated bikeway on SR 82 to connect the City of Santa Clara and North San José. The project will run from the intersection of SR 82/Lawrence Expy in Santa Clara and along The Alameda, Hedding St, the North 10th/11th St couplet, Taylor St, and Mabury Rd, ending near the Berryessa BART Station in North San José.

To discuss project coordination with Caltrans, please email LDR-D4@dot.ca.gov and reference the EA number 04-3X340.

Response A.9: This comment is acknowledged. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.10: Encroachment Permit

Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway ROW requires a Caltrans-issued encroachment permit.

Response A.10: As noted in Response A.3 above, if construction activities will occur in Caltrans ROW, the project applicant would coordinate with Caltrans' Office of Encroachment Permits as needed to obtain the appropriate Encroachment Permit. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.11: The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. Please ensure that proposed work within Caltrans ROW conforms with the latest versions of the Caltrans Highway Design Manual ([link](#)) and Caltrans Standard Plans and Specifications ([link](#)). Project plans within State ROW must clearly show the State ROW line for the whole plan limits along with all existing roadway features (lane lines, edge of pavement, curbs, existing signage, trees and utility poles, etc.). The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))
- Caltrans Encroachment Projects Processes – Information Video ([link](#))

- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process. To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)).

Response A.11: This comment is acknowledged. If construction activities will occur in Caltrans ROW, the project applicant would utilize these resources and coordinate with Caltrans' Office of Encroachment Permits as needed to obtain the appropriate Encroachment Permit. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment A.12: Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Response A.12: This comment is acknowledged. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Regional and Local Agencies

B. Santa Clara Valley Transportation Authority (Dated May 28, 2026)

Comment B.1: VTA appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) and Transportation Analysis (TA) for the University Station Project at 451 El Camino Real, shared by City staff on April 10, 2026.

VTA has reviewed the documents and has the following comments:

Central Bikeway Contribution

The final Transportation Analysis acknowledged that the project should provide a fair share contribution toward the cost of the future Class IV separated bikeway along its El Camino Real frontage. VTA supports this recommendation and requests that it be formalized as a condition of project approval.

Response B.1: Consistent with the recommendations in the Transportation Analysis completed for the project, the City will include a condition of approval in the findings report for all requested entitlements for the project to provide a fair share contribution toward the cost of the future Class IV separated bikeway along its El Camino Real frontage.

Comment B.2: VTA also requests that any frontage improvements constructed by the project (including street trees, utilities, and light poles) be designed in consultation with VTA to minimize conflicts with the future Central Bikeway facility.

Response B.2: As noted on page 172 of the Draft EIR, the project would not alter or remove any existing bicycle facilities or interfere with the future installation of planned improvements in the 2018 City of Santa Clara Final Bicycle Plan Update, including the planned Class IV separated bikeway on El Camino Real adjacent to the project site. As project designs are finalized, the project applicant would continue to coordinate with City staff and other interested agencies (i.e., VTA, Caltrans, City of San José) to ensure consistency with applicable requirements and to avoid conflicts with planned improvements.

Comment B.3: Consistency with MTC's Transit-Oriented Communities (TOC) Policy and VTA's Santa Clara BART Station Area Playbook

VTA reiterates our concern regarding density, first raised in a comment letter for the project's Notice of Preparation, sent to City staff on June 23, 2025. The inclusion of 111 three-story townhouses results in an overall project density of 39.4 dwelling units per acre (du/ac), which falls well below the 75 du/ac minimum called for in the MTC TOC Policy for Tier 2 Station Areas, and below the 5–8 story residential densities called for in the VTA Santa Clara BART Station Area

Playbook. The DEIR does not discuss the project's consistency with either of these adopted planning frameworks. VTA requests that this analysis be included in the Final EIR.

Response B.3: The project is not obligated to comply with either of these policies as they are recommendations for development near transit stations and projects within the City are not bound by the design guidelines and density ranges included in either policy as part of the development entitlement process. Therefore, discussions regarding the project's consistency with the MTC TOC Policy for Tier 2 Station Areas and VTA Santa Clara BART Station Area Playbook were not included in the Draft EIR.

Comment B.4: Transportation Demand Management (TDM) Monitoring

The DEIR describes the project's TDM measures in Section 2.2.5 but does not include a post-occupancy monitoring plan to confirm that trip reduction goals are being met. VTA requests that a monitoring and reporting framework be included as a condition of project approval, including annual reporting requirements and a designated Transportation Coordinator responsible for the program's implementation and compliance. The TA states that "the project's TDM plan is provided as Attachment 1" but this attachment was not included in the materials shared with VTA. VTA requests that the City share a copy of this plan for our records.

Response B.4: The March 2025 TDM Plan noted in the Draft EIR includes a requirement for the project to, "Manage annual surveys and submit annual TDM monitoring reports to the City. The results will be used to determine whether the implemented TDM measures are effective and whether new TDM measures should be implemented." Text has been added to Section 5.0 below to confirm that annual monitoring would be completed for the project, consistent with City requirements. The City shall provide a copy of the TDM Plan to VTA for reference.

Comment B.5: Transit Signal Priority (TSP) Equipment

VTA strongly supports the recommendation in the Transportation Analysis (page 20) for the applicant to provide a contribution towards replacement of TSP equipment. We encourage the City to collaborate with the applicant on a formal agreement for said contributions with our Transit Planning team.

Response B.5: Consistent with the recommendations in the Transportation Analysis completed for the project, the City will include a condition of approval in the findings report for all requested entitlements for the project to provide full payment for TSP equipment at the adjacent intersections, as needed. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment B.6: Transportation Analysis Software

Per VTA's Transportation Analysis (TA) Guidelines, adopted in June of 2025. The use of PTV VISTRO, instead of TRAFFIX, is recommended for analysis of intersection movement and operations for any TA during this process. We encourage the City to ensure future TAs abide by VTA's TA Guidelines.

Response B.6: This comment is acknowledged. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment B.7: Thank you again for the opportunity to review this project. If you have any questions, please do not hesitate to contact me at douglas.kean@vta.org, or the VTA Land Use and Development Review team at plan.review@vta.org

Response B.7: This comment is acknowledged. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

C. Santa Clara Valley Water District (dated May 26, 2026)

Comment C.1: The Santa Clara Valley Water District (Valley Water) has reviewed the Draft EIR, received April 9, 2026, for the 451 El Camino Real - University Station Project and has the following comments:

Given the size of the proposed development, Valley Water recommends that the applicant provide a Water Supply Assessment (WSA) with estimates of total annual water demand, including demand for any potential dewatering or fire flow requirements. The WSA should also clarify whether water supply for the project will be serviced by private wells on-site or a specified water retailer. WSAs help support Valley Water's management of water supply and sustainable groundwater resources in Santa Clara County.

Response C.1: Under Senate Bill 610, WSAs must be furnished to local governments for inclusion in any environmental documentation for specified large development projects subject to CEQA that also require a General Plan Amendment. For residential developments, such as the proposed project, a WSA would only be required for a proposed development of more than 500 dwelling units. The project is proposing construction of 408 dwelling units; therefore, a WSA was not required for the Draft EIR and none was prepared. In addition, the General Plan Amendment portion of the project only applies to the area of the project site that is proposed for annexation from the City of San José, and only 13 dwelling units would be covered under the General Plan Amendment. Estimated water demand for the project is detailed on pages 184 to 186 of the Draft EIR. No private wells are proposed as part of the project.

Comment C.2: The proposed development overlies an area of shallow groundwater. According to Valley Water's Historical Groundwater Elevation Data web tool (<https://gis.valleywater.org/Wells.html>), depths to groundwater in the area range from approximately 5 to 10 feet below the ground surface. Groundwater depths fluctuate seasonally and annually but have been relatively high in recent years due to wet winters.

Response C.2: This is consistent with the groundwater depth noted on page 84 of the Draft EIR which was measured to be between two to 10 feet below ground surface on-site. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment C.3: The EIR should include a discussion of measures that will be taken to ensure the protection of shallow groundwater quality, including but not limited to:
a. Any proposed earthwork should be evaluated and monitored to ensure that construction activities do not adversely impact shallow groundwater quality.

Response C.3: As discussed under the Construction Water Quality heading on pages 120 to 121 of the Draft EIR, the project would comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for Construction Activities and submit a Storm Water Pollution Prevention Plan (SWPPP) and Notice of Intent (NOI) to the State Water Resources Control Board (SWRCB) to document the measures that will be taken to reduce potential construction related water quality impacts. In addition, as noted on pages 120 and 123 of the Draft EIR, the project would implement various best management practices (BMPs) related to stormwater pollution prevention to further reduce potential impacts to water quality during construction of the project. Consistent with the requirements of Section 13.20.050 of the City Code and RWQCB procedures, if any shallow groundwater is exposed during excavation activities, the project would test the groundwater prior to discharge to ensure there are no releases of contaminated water. The project would also implement mitigation measure MM HAZ-1.1 which would include preparation of a Health and Safety Plan (HSP), Site Management Plan (SMP), Removal Action Plan (RAP), or equivalent document under regulatory oversight by the RWQCB. This would outline measures to ensure that soil and groundwater are properly handled and that no contaminants are introduced to the site when importing material.

Comment C.4: b. Stormwater management features and/or infiltration devices implemented at the site should be designed to minimize groundwater quality degradation. These features/devices should maintain adequate vertical separation to seasonally high groundwater and comply with applicable sections of the Santa Clara Valley Urban Runoff Pollution Prevention Program C.3 Stormwater Handbook.

Response C.4: To ensure bioretention areas maintain a vertical separation from seasonally high groundwater, the project would take site-specific information regarding measured groundwater depths on-site into consideration when siting and

designing the infiltration devices for the project. In addition, as required by the City, the project would comply with the design requirements in the Santa Clara Valley Urban Runoff Pollution Prevention Program C.3 Stormwater Handbook when designing infiltration devices, including requirements regarding adequate vertical separation from seasonally high groundwater.

Comment C.5: c. The proposed development is located near or downgradient of known groundwater cleanup sites (i.e., contamination sites), which can be identified on the State Water Resources Control Board's GeoTracker webpage (<https://geotracker.waterboards.ca.gov/>). In fact, one or two (1-2) former contamination sites appear to exist on the site property itself (Mayfair Packing Plants: T0608500879 and T0608502098).

Response C.5: This is consistent with the history of known contamination and open/closed cleanup cases on adjacent sites and at the project site, as detailed in Section 3.9 of the Draft EIR (pages 102 to 113). As discussed under checklist question b) on pages 109 to 110 of the Draft EIR, the project would implement mitigation measure MM HAZ-1.1 to adequately test the subsurface soils and soil vapor on-site and identify remedial measures and/or appropriate management practices to ensure construction worker safety and protect the health of nearby sensitive receptors. In addition, consistent with the requirements of Section 13.20.050 of the City Code and RWQCB procedures, any water pumped from the site during temporary construction dewatering would be tested prior to discharge to ensure there are no releases of contaminated water.

Comment C.6: d. The applicant should ensure that site operations during and after construction (e.g., excavation, dewatering, stormwater management) do not interfere with any active environmental cleanup projects in the surrounding area.

Response C.6: As noted in Response C.7 above, the project would implement mitigation measure MM HAZ-1.1 which would include preparation of a HSP, SMP, RAP, or equivalent document under regulatory oversight by the RWQCB. This would ensure that construction activities do not interfere with active environmental cleanup projects on-site or in the vicinity of the project site.

Comment C.7: The EIR needs to include a discussion of measures that will be taken to protect existing or abandon wells within the project site. Valley Water records identify at least eight (8) destroyed wells at the site, which can be viewed on Valley Water's Well Information webpage (<https://gis.valleywater.org/Wells.html>). Any wells in-use that may be impacted by project activities must be protected. It should be noted that Valley Water records may not include all abandoned, unused or unregistered wells. Any abandoned, unused, or unregistered wells identified during project planning or construction should be properly destroyed. For more information, contact Valley Water's Well Permitting and Inspection Hotline at (408) 630-2660, or visit: <https://www.valleywater.org/contractors/doing-businesses-with-the-district/wells-well-owners>.

Response C.7: There are no known, existing wells that would require protection or that would be abandoned as part of the project. In the event an unknown well is found on-site during project construction, it shall be properly destroyed under permit from Valley Water (as described on page 116 of the Draft EIR) or registered with Valley Water and protected from damage.

Comment C.8: Re-development of the site provides opportunities to minimize water and associated energy use by using recycled water, incorporating on-site reuse for both storm and graywater, and requiring water conservation measures above State standards (i.e., CALGreen). To reduce or avoid adverse impacts to water supply, the City and applicant should consider the following in the EIR:

- a. Landscaping that exceeds the requirements of the City's water efficient landscape regulations;
- b. Weather- or soil-based irrigation controllers;
- c. Dedicated landscape meters;
- d. Submeters for multi-family housing and individual spaces within commercial buildings;
- e. Dual plumbing to facilitate and maximize the use of alternative water sources for irrigation, toilet flushing, cooling towers, and other non-potable water uses; and
- f. Alternative water sources for non-potable uses including recycled water, stormwater, rainwater, and graywater.

Response C.8: As noted in Section 2.2.4 of the Draft EIR (page 8), the project would meet all CALGreen and Energy Code requirements per the State of California and the City of Santa Clara. This would include installation of water-efficient landscaping and irrigation systems, and the inclusion of water-efficient plumbing fixtures in each dwelling unit. Other water conservation measures suggested by the commenter will be provided to the decision-makers for consideration.

Comment C.9: According to Federal Emergency Management Agency's (FEMA) current Flood Insurance Rate Map Nos. 06085C0231H, dated May 18, 2009, the subject parcels (APN: 230-09-020 and 230-09-021) are partially within FEMA's Special Flood Hazard Area (SFHA) – Zone AH, which are areas that have been identified to have a 1% annual chance of shallow flooding, usually in the form of a pond, with an average depth ranging from 1 to 3 feet. The EIR incorrectly identifies Zone AH as a regulatory floodway, which are areas that have been reserved from encroachments to provide conveyance during the 1% annual exceedance event.

Response C.9: The relevant text has been revised to accurately reflect the definition of Zone AH, see Section 5.0 for the text revisions.

Comment C.10: Furthermore, the EIR does not include a discussion, along with supporting analysis, to evaluate whether the project will impede or redirect flood flows. Since the project is within FEMA's SFHA, a hydraulic analysis in accordance with FEMA mapping standards needs to be completed, and the project needs to demonstrate that it will not adversely impact flooding for neighboring properties – both in terms of frequency and magnitude.

Response C.10: Text has been added to Section 3.10 of the Draft EIR address whether the project would impede or redirect flood flows, see Section 5.0 for the relevant text additions.

Comment C.11: It should also be noted that all projects within the SFHA are subject to the City of Santa Clara's floodplain ordinance.

RESPONSE C.11: Page 117 of the Draft EIR notes that the City Code includes requirements for flood damage prevention, this text has been revised to clarify the contents of Chapter 15.45 of City Code. Text has also been added to the relevant impact discussion to note that the project would comply with relevant requirements in Chapter 15.45 of City Code. See Section 5.0 for the relevant text additions.

Organizations, Businesses, and Individuals

D. Farah Rahbar (dated May 14, 2026)

Comment D.1: I am a resident of San Jose, specifically on the street Dahlia Loop which is off of Campbell Street in Santa Clara. I am strongly against building 297 units, University Station Residential Units by Bixby Land Company.

Response D.1: This section introduces the comments below, which are subsequently responded to below.

Comment D.2: Building additional units will cause increased density, safety hazards, and infrastructure strain. Please note, Campbell Street is a one-way Street and ends to a Children's Park, so there is already density in traffic near all of our homes.

Response D.2: The project's potential transportation and utilities and service systems impacts were discussed in Section 3.17 (pages 164 to 176) and Section 3.19 (pages 180 to 188) of the Draft EIR, respectively. These impacts, including those regarding potential safety hazards resulting from the project, were determined to be less than significant, and no mitigation was required. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment D.3: In addition, to residents several businesses also reside off of Campbell Street and all use Campbell Street to exit to El Camino Real, directly across from Santa Clara University. The new proposed building residents also will use the same way to enter and exit to El Camino Real, clogging a street already clogged with traffic.

Response D.3: The project's potential transportation impacts were discussed in Section 3.17 (pages 164 to 176) of the Draft EIR. These impacts were determined to be less than significant, and no mitigation was required. In addition, the Draft EIR included a discussion on potential queuing issues at adjacent intersections on pages 175 to 176 of the Draft EIR. This discussion concluded that the project would not result in significant adverse effects on the intersections surrounding the project site. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment D.4: Additionally, currently Santa Clara University occupies 3 of the buildings where the proposed area of additional 297 units by Bixby Land Company is and students and staff use the entire existing parking lot.

On game days when SCU has events, buses carrying the athletes also park in the same parking area as well as spectators.

There are also some businesses including Sonestra Suites Hotel, Bank of America, Starbucks, and other businesses and customers will also need parking.

Additionally, the area is finishing construction for BART station. Where would the riders park their cars?

In fact, consider the many already residents and businesses of Campbell Street:

1- Stephen Schott Stadium, on game days, which is most of the day's participants park in parking areas where the plan is to build by Bixby Land Company and they all use Campbell Street to enter and exit.

2- Santa Clara University Villas Residence Hall

3- Domicilio Apartments with a driveway to its parking lot

4- Dahlia Loop and Arbol way has approximately 100 Units

5- Alta Mar Terraces with 100 plus units

6- 1185 Campbell Ave, a meal package delivery requiring hundreds of trucks and cars on the street for pickup and delivery daily.

7- 1085 Campbell Ave, another business with vans (again no official name on the building) - at least 50 vans and cars in its parking lot daily

8- Trek Movers, a Local and Long-Distance Moving Company

9- Underground Republic Water Works

10- Precision Specialties

11- Violet Sea Fish and Coral Aquarium

12- A Children's park

Response D.4: A project's potential impacts on parking supply are not considered an impact under CEQA. However, as noted on page 28 of the Draft EIR, pursuant to Senate Bill 743, aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area shall not be considered significant impacts on the environment. Since the project site is located in a transit priority area and consists of a residential development on an infill site, the parking impacts would not be considered a significant impact on the environment. The comment does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment D.5: I hope that you will re-consider the impact of the proposal on the current residents, the population of university students and staff, and CSU visitors and existing businesses including BART and CalTrans before approving construction of additional 297 units off the already extremely busy El Camino Real.

Response D.5: This comment is acknowledged and will be considered by the lead agency during the decision-making process for the project's approval. The comment

does not raise any specific issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment D.6: Building 297 additional units on already congested street will lead to more cars in limited spaces, increased street parking and traffic, and possible accidents and incidents in an already condensed area.

Response D.6: Refer to Responses D.2 through D.4 above for information regarding parking, project generated traffic, and safety hazards.

Section 5.0 Draft EIR Text Revisions

This section contains revisions to the text of the University Station Residential project Draft EIR dated April 2026. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

Page vi of the Draft EIR **REVISE** the first sentence in the first paragraph of MM CUL-1.1 as follows:

MM CUL-1.1: After demolition, but pPrior to issuance of any ~~demolition or~~ grading or building permits, a qualified archaeological consultant will conduct subsurface sampling in identified sensitive areas on-site (based on the Archaeological Sensitivity Assessment) to determine if subsurface archeological resources are present.

Page vi of the Draft EIR **DELETE** the last sentence in the third paragraph of MM CUL-1.1 as follows:

Implementation of the plan will occur prior to issuance of any grading permits in conformance with the steps outlined below. ~~Depending on the extent of the investigation outlined in the treatment plan, demolition permits may be required and will be issued (if needed) after review and approval of the plan by the Director of Community Development.~~

Page 11 of the Draft EIR **ADD** the following text to the end of Section 2.2.5:

Consistent with City requirements, the project would be required to submit the results of annual surveys and provide annual TDM monitoring reports to the City for review.

Page 68 of the Draft EIR **REVISE** the first sentence in the first paragraph of MM CUL-1.1 as follows:

MM CUL-1.1: After demolition, but pPrior to issuance of any ~~demolition or~~ grading or building permits, a qualified archaeological consultant will conduct subsurface sampling in identified sensitive areas on-site (based on the Archaeological Sensitivity Assessment) to determine if subsurface archeological resources are present.

Page 69 of the Draft EIR **DELETE** the last sentence in the third paragraph of MM CUL-1.1 as follows:

Implementation of the plan will occur prior to issuance of any grading permits in conformance with the steps outlined below. ~~Depending on the extent of the investigation outlined in the treatment plan, demolition permits may be required and will be issued (if needed) after review and approval of the plan by the Director of Community Development.~~

DELETE the text after the second sentence under the Santa Clara Reach Code heading as follows:

Reach Codes are local ordinances adopted by the local government that exceed and enhance the current version of the 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. ~~The City Council adopted the most recent version of the Reach Code on November 4, 2025, and it went into effect on January 1, 2026. It requires a higher percentage of EV-ready spaces than state law for most land uses and requires a higher percentage of PV panels than state law for certain multi-family and non-residential uses. For the proposed project, the following standards would apply:~~

- ~~• The first 20 parking spaces would need to be Level 2 EV Ready spaces (20);~~
- ~~• 25 percent of the remaining spaces would need to be Level 2 EV Ready spaces (69);~~
- ~~• 75 percent of the remaining spaces would need to be Low Power EV Ready spaces (208);~~
- ~~• The multi-family building would be required to install a five kW_{DC} PV panel system.~~

REVISE the second sentence in the second paragraph under the 2022 Climate Action Plan heading as follows:

The project would be required to be built in accordance with the most recent CALGreen and applicable City Reach Code requirements, including those regarding the provision of EV charging on-site for residents.

REVISE the last sentence under the Santa Clara City Code heading as follows:

The City Code also includes ~~Flood Damage Prevention Code~~ Floodplain Management Regulations (Chapter 15.45), which outline minimum requirements for development located in flood hazard areas, and requirements for grading and excavation permits and erosion control (Chapter 15.15).

REVISE the second sentence under the Flooding heading as follows:

Portions of the project site, particularly around the northern and eastern boundaries of the site, are located in Zone AH, which indicates an area with a one percent annual chance of shallow flooding, usually in the form of a pond, with an average depth ranging from one to three feet. ~~regulatory floodway that~~ Zone AH is considered a special flood hazard area.

ADD the following text below the second paragraph under the Post-Construction Impacts heading:

As noted in Section 3.10.1.2, portions of the project site around the northern and eastern site boundaries are located in Zone AH, which indicates an area with a one percent annual chance of shallow flooding and is considered a special flood hazard area. Although the extent of the special flood hazard area on-site is unclear given the inconsistent alignment of the mapped special flood hazard areas surrounding the site, it is assumed that Zone AH covers a narrow area on the northern site boundary, portions of the site around the Campbell Avenue driveway, and a small portion of the driveway entrance on Franklin Street. These areas currently consist of surface parking areas bordered by a chain-link fence with wooden slats and thick vegetation, permeable landscaping area, and impervious driveway areas, respectively. With implementation of the project, these conditions would be largely unchanged as the driveway entrances on Franklin Street and Campbell Avenue would remain in place, and the area east of the Campbell Avenue driveway would contain similar amounts of landscaping compared to existing conditions. The portion of the site along the northern boundary would be redeveloped with permeable landscaping areas and limited impervious surfaces. A portion of one residential unit may also be constructed within the mapped special flood hazard area. The primary difference between existing conditions and the proposed project in this area would be the replacement of the chain-link fence with wooden slats along the northern site boundary with a soundwall. However, the western portion of the site would not include this wall. Therefore, potential flood flows would still be able to enter the site from the west and would not be redirected to any adjacent properties as a result of the project. In addition, the project would be constructed consistent with the requirements of City Code Chapter 15.45 to reduce the risk of potential flood damage to structures on-site. Based on this discussion, the project would not result in the impediment or redirection of any flood flows that would affect adjacent properties or exacerbate potential flooding on or adjacent to the site.

REVISE the second sentence under checklist question d) as follows:

However, portions of the project site around the northern and eastern site boundaries are located in Zone AH, which indicates an area with a one percent annual chance of shallow flooding, usually in the form of a pond, with an average depth ranging from one to three feet. ~~regulatory floodway that~~ Zone AH is considered a special flood hazard area.

Appendix A: Draft EIR Comment Letters

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



May 20, 2026

SCH #: 2025050963
GTS #: 04-SCL-2025-01506
GTS ID: 36545
Co/Rt/Pm: SCL/82/R10.908

Steve Le, Senior Planner
City of Santa Clara
1500 Warburton Ave
Santa Clara, CA 95050

Re: University Station Residential Project — Draft Environmental Impact Report (DEIR)

Dear Steve Le:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the University Station Residential Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the April 2026 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding

The project proposes to demolish the four existing office buildings and two parking garages to construct a new five-story building with up to 297 multi-family residential units and up to 111 three-story townhome units distributed amongst 26 buildings. The multi-family residential building will be constructed directly adjacent to State Route (SR) 82 and work impacting the sidewalks on SR 82 along the project frontage is proposed.

Travel Demand Analysis

The project vehicle miles traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the City of Santa Clara's adopted VMT Transportation Analysis Policy as well as the City of San José's 2023 Transportation Analysis Handbook. Per the DEIR, this transit supportive project is found to have a less than significant VMT impact, therefore working towards meeting the State's VMT reduction goals.

Design

Per the DEIR, the existing sidewalks adjacent to the multi-family residential building frontage along SR 82 and the existing segments for sidewalks adjacent to the driveway entrances to the project site would be reconstructed and made to conform with the existing curb and gutter lines along SR 82, Franklin Street, and Campbell Ave. Street trees will also be planted along the project frontage on SR 82.

All proposed work within Caltrans Right-of-Way (ROW) requires a Caltrans-issued Encroachment Permit. Information about the permit application process is included in the Encroachment Permit section of this letter. Please also be advised that a maintenance agreement for the modifications within Caltrans ROW shall be discussed with the Caltrans District 4 Division of Maintenance during the encroachment permit application stage.

The proposed pedestrian pathway along SR 82 must replicate, to the maximum extent feasible, the characteristics of the existing pathway. Please also ensure that any Caltrans facilities impacted by the project meet Americans with Disabilities Act (ADA) Standards after project completion.

Furthermore, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users. Sidewalk and driveway design within Caltrans ROW shall comply with Caltrans Design Information Bulletin (DIB) 82-06 on Pedestrian Accessibility Guidelines for Highway Projects ([link](#)). Please also see Caltrans Standard Plans T30-34 ([link](#)) for specific pedestrian temporary control alternatives.

Hydrology

Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Any floodplain impacts must be documented and mitigated.

During the encroachment permit application stage, please include a Hydraulics Report as part of the permit application package. The report should address how the existing SR 82 drainage system would be impacted by the project, include pre- and post-construction surface runoff flows, and discuss whether any mitigation is necessary.

Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Project Coordination

This proposed project will require coordination with the Central Bikeway Project. This project, led by the Santa Clara Valley Transportation Authority (VTA) in partnership with the City of Santa Clara, the City of San José, the County of Santa Clara and Caltrans, is developing a 10.8-mile Class IV separated bikeway on SR 82 to connecting the City of Santa Clara and North San José. The project will run from the intersection of SR 82/Lawrence Expy in Santa Clara and along The Alameda, Hedding St, the North 10th/11th St couplet, Taylor St, and Mabury Rd, ending near the Berryessa BART Station in North San José.

To discuss project coordination with Caltrans, please email LDR-D4@dot.ca.gov and reference the EA number 04-3X340.

Encroachment Permit

Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway ROW requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. Please ensure that proposed work within Caltrans ROW conforms with the latest versions of the Caltrans Highway Design Manual ([link](#)) and Caltrans Standard Plans and Specifications ([link](#)). Project plans within State ROW must clearly show the State ROW line for the whole plan limits along with all existing roadway features (lane lines, edge of pavement, curbs, existing signage, trees and utility poles, etc.).

The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))
- Caltrans Encroachment Projects Processes – Information Video ([link](#))
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Luo Yunsheng'.

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse



May 27, 2026

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

Dear Steven,

VTA appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) and Transportation Analysis (TA) for the University Station Project at 451 El Camino Real, shared by City staff on April 10, 2026.

VTA has reviewed the documents and has the following comments:

Central Bikeway Contribution

The final Transportation Analysis acknowledged that the project should provide a fair share contribution toward the cost of the future Class IV separated bikeway along its El Camino Real frontage. VTA supports this recommendation and requests that it be formalized as a condition of project approval. VTA also requests that any frontage improvements constructed by the project (including street trees, utilities, and light poles) be designed in consultation with VTA to minimize conflicts with the [future Central Bikeway facility](#).

Consistency with MTC's Transit-Oriented Communities (TOC) Policy and VTA's Santa Clara BART Station Area Playbook

VTA reiterates our concern regarding density, first raised in a comment letter for the project's Notice of Preparation, sent to City staff on June 23, 2025. The inclusion of 111 three-story townhouses results in an overall project density of 39.4 dwelling units per acre (du/ac), which falls well below the 75 du/ac minimum called for in the [MTC TOC](#) Policy for Tier 2 Station Areas, and below the 5–8 story residential densities called for in the [VTA Santa Clara BART Station Area Playbook](#). The DEIR does not discuss the project's consistency with either of these adopted planning frameworks. VTA requests that this analysis be included in the Final EIR.

Transportation Demand Management (TDM) Monitoring

The DEIR describes the project's TDM measures in Section 2.2.5 but does not include a post-occupancy monitoring plan to confirm that trip reduction goals are being met. VTA requests that a monitoring and reporting framework be included as a condition of project approval, including annual reporting requirements and a designated Transportation Coordinator responsible for the program's implementation and compliance. The TA states that "the project's TDM plan is provided as Attachment 1" but this attachment was not included in the materials shared with VTA. VTA requests that the City share a copy of this plan for our records.

Transit Signal Priority (TSP) Equipment

VTA strongly supports the recommendation in the Transportation Analysis (page 20) for the applicant to provide a contribution towards replacement of TSP equipment. We encourage the City to collaborate with the applicant on a formal agreement for said contributions with our Transit Planning team.

Transportation Analysis Software

Per VTA's Transportation Analysis (TA) Guidelines, adopted in June of 2025. The use of PTV VISTRO, instead of TRAFFIX, is recommended for analysis of intersection movement and operations for any TA during this process. We encourage the City to ensure future TAs abide by VTA's TA Guidelines.

Thank you again for the opportunity to review this project. If you have any questions, please do not hesitate to contact me at douglas.kean@vta.org, or the VTA Land Use and Development Review team at plan.review@vta.org.

Sincerely,

Douglas Kean
Transportation Planner II
SC2502



File: 35445
Guadalupe River

May 26, 2026

Steve Le
City of Santa Clara
1500 Warburton Ave
Santa Clara, CA 95050

Subject: 451 El Camino Real – University Station Project Draft EIR Comments

Dear Steven,

The Santa Clara Valley Water District (Valley Water) has reviewed the Draft EIR, received April 9, 2026, for the 451 El Camino Real - University Station Project and has the following comments:

1. Given the size of the proposed development, Valley Water recommends that the applicant provide a Water Supply Assessment (WSA) with estimates of total annual water demand, including demand for any potential dewatering or fire flow requirements. The WSA should also clarify whether water supply for the project will be serviced by private wells on-site or a specified water retailer. WSAs help support Valley Water's management of water supply and sustainable groundwater resources in Santa Clara County.
2. The proposed development overlies an area of shallow groundwater. According to Valley Water's Historical Groundwater Elevation Data web tool (<https://gis.valleywater.org/Wells.html>), depths to groundwater in the area range from approximately 5 to 10 feet below the ground surface. Groundwater depths fluctuate seasonally and annually but have been relatively high in recent years due to wet winters. The EIR should include a discussion of measures that will be taken to ensure the protection of shallow groundwater quality, including but not limited to:
 - a. Any proposed earthwork should be evaluated and monitored to ensure that construction activities do not adversely impact shallow groundwater quality.
 - b. Stormwater management features and/or infiltration devices implemented at the site should be designed to minimize groundwater quality degradation. These features/devices should maintain adequate vertical separation to seasonally high groundwater and comply with applicable sections of the Santa Clara Valley Urban Runoff Pollution Prevention Program C.3 Stormwater Handbook.
 - c. The proposed development is located near or downgradient of known groundwater cleanup sites (i.e., contamination sites), which can be identified on the State Water Resources Control Board's GeoTracker webpage (<https://geotracker.waterboards.ca.gov/>). In fact, one or two (1-2) former contamination sites appear to exist on the site property itself (Mayfair Packing Plants: T0608500879 and T0608502098).
 - d. The applicant should ensure that site operations during and after construction (e.g., excavation, dewatering, stormwater management) do not interfere with any active environmental cleanup projects in the surrounding area.

Page 2 of 3

May 26, 2026

Steve Le

451 El Camino Real – University Station Project Draft EIR Comments

3. The EIR needs to include a discussion of measures that will be taken to protect existing or abandon wells within the project site. Valley Water records identify at least eight (8) destroyed wells at the site, which can be viewed on Valley Water's Well Information webpage (<https://gis.valleywater.org/Wells.html>). Any wells in-use that may be impacted by project activities must be protected. It should be noted that Valley Water records may not include all abandoned, unused or unregistered wells. Any abandoned, unused, or unregistered wells identified during project planning or construction should be properly destroyed. For more information, contact Valley Water's Well Permitting and Inspection Hotline at (408) 630-2660, or visit: <https://www.valleywater.org/contractors/doing-businesses-with-the-district/wells-well-owners>.
4. Re-development of the site provides opportunities to minimize water and associated energy use by using recycled water, incorporating on-site reuse for both storm and graywater, and requiring water conservation measures above State standards (i.e., CALGreen). To reduce or avoid adverse impacts to water supply, the City and applicant should consider the following in the EIR:
 - a. Landscaping that exceeds the requirements of the City's water efficient landscape regulations;
 - b. Weather- or soil-based irrigation controllers;
 - c. Dedicated landscape meters;
 - d. Submeters for multi-family housing and individual spaces within commercial buildings;
 - e. Dual plumbing to facilitate and maximize the use of alternative water sources for irrigation, toilet flushing, cooling towers, and other non-potable water uses; and
 - f. Alternative water sources for non-potable uses including recycled water, stormwater, rainwater, and graywater.
5. According to Federal Emergency Management Agency's (FEMA) current Flood Insurance Rate Map Nos. 06085C0231H, dated May 18, 2009, the subject parcels (APN: 230-09-020 and 230-09-021) are partially within FEMA's Special Flood Hazard Area (SFHA) – Zone AH, which are areas that have been identified to have a 1% annual chance of shallow flooding, usually in the form of a pond, with an average depth ranging from 1 to 3 feet. The EIR incorrectly identifies Zone AH as a regulatory floodway, which are areas that have been reserved from encroachments to provide conveyance during the 1% annual exceedance event. Furthermore, the EIR does not include a discussion, along with supporting analysis, to evaluate whether the project will impede or redirect flood flows. Since the project is within FEMA's SFHA, a hydraulic analysis in accordance with FEMA mapping standards needs to be completed, and the project needs to demonstrate that it will not adversely impact flooding for neighboring properties – both in terms of frequency and magnitude. It should also be noted that all projects within the SFHA are subject to the City of Santa Clara's floodplain ordinance.

If you have any questions, or need further information, you can reach me at (408) 630-2976, or by email at JMiguel@valleywater.org.

Page 3 of 3

May 26, 2026

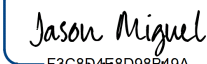
Steve Le

451 El Camino Real – University Station Project Draft EIR Comments

Please reference Valley Water File No. 35445 on future correspondence regarding this project.

Sincerely,

Signed by:

A blue ink handwritten signature of Jason Miguel, enclosed in a blue rectangular box.

F3C8D4E8D98B49A...
Jason Miguel

Assistant Engineer II – Civil

Community Projects Review Unit

Cc: Y. Arroyo, C. Haggerty, B. Hwang, J. Miguel, J. Gurdak, G. Tick, C. Hirota, D. Sausele, J. Wu, File

Farah Rahbar _____

May 14, 2026

Steve Lee, Senior Planner

City of Santa Clara, Community Development Dept., Planning Division

1500 Warburton Ave

Santa Clara, CA 95050



Re: Notice of availability of an environment impact report (EIR). (Bixby Land Company)

Dear Steve Lee,

I am a resident of San Jose, specifically on the street _____ in Santa Clara. I am strongly against building 297 units, University Station Residential Units by Bixby Land Company.

Building additional units will cause increased density, safety hazards, and infrastructure strain. Please note, Campbell Street is a one-way Street and ends to a Children's Park, so there is already density in traffic near all of our homes.

In addition, to residents several businesses also reside off of Campbell Street and all use Campbell Street to exit to El Camino Real, directly across from Santa Clara University. The new proposed building residents also will use the same way to enter and exit to El Camino Real, clogging a street already clogged with traffic.

Additionally, currently Santa Clara University occupies 3 of the buildings where the proposed area of additional 297 units by Bixby Land Company is and students and staff use the entire existing parking lot. On game days when SCU has events, buses carrying the athletes also park in the same parking area as well as spectators.

There are also some businesses including Sonestra Suites Hotel, Bank of America, Starbucks, and other businesses and customers will also need parking.

Additionally, the area is finishing construction for BART station. Where would the riders park their cars? In fact, consider the many already residents and businesses of Campbell Street:

1- Stephen Schott Stadium, on game days, which is most of the day's participants park in parking areas where the plan is to build by Bixby Land Company and they all use Campbell Street to enter and exit.

2- Santa Clara University Villas Residence Hall

- 3- Domicilio Apartments with a driveway to its parking lot
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- 5- Alta Mar Terraces with 100 plus units
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- 7- 1085 Campbell Ave, another business with vans (again no official name on the building)
 - at least 50 vans and cars in its parking lot daily
- 8- Trek Movers, a Local and Long-Distance Moving Company
- 9- Underground Republic Water Works
- 10- Precision Specialties
- 11- Violet Sea Fish and Coral Aquarium
- 12- A Children's park

I hope that you will re-consider the impact of the proposal on the current residents, the population of university students and staff, and CSU visitors and existing businesses including BART and CalTrans before approving construction of additional 297 units off the already extremely busy El Camino Real.

Building 297 additional units on already congested street will lead to more cars in limited spaces, increased street parking and traffic, and possible accidents and incidents in an already condensed area.

Sincerely,



Farah Rahbar