



September 25, 2008

Ms. Carol Anne Painter, City Planner
City of Santa Clara
Planning Division
1500 Warburton Avenue
Santa Clara, CA 95050

RE: Notice of Preparation of an Environmental Impact Report for the City of Santa Clara General Plan Update

Dear Ms. Painter,

Thank you for allowing Greenbelt Alliance the opportunity to provide comments for this proposed project and for the City's consideration of these comments as part of the California Environmental Quality Act (CEQA) process.

Project Description

The City of Santa Clara is updating the General Plan which was last comprehensively updated in 1992. The horizon for the update is 2035. According to the Association of Bay Area Governments, Santa Clara is projected to add 50,000 new jobs and 146,100 new residents over the next 25 years. The update will address a number of issues including Land Use, Housing, Sustainability and Transportation.

Greenbelt Alliance Comments

To assist the City of Santa Clara's analysis and evaluation of this project, and aid in the determination of the adequacy of the Draft Environmental Impact Report (DEIR), Greenbelt Alliance requests that the following comments be addressed in the DEIR under preparation by the lead agency.

The Draft Environmental Impact Report should include context setting around climate change. This should include background on climate change impacts on the state, region and City of Santa Clara. There should also be background on state and regional

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regulations, targets and inventories such as AB32, SB375, the Mayor's Climate Protection Agreement and the recent settlement between the City of Stockton and the Attorney General on that City's General Plan.

The Draft Environmental Impact Report should analyze the projected greenhouse gas emissions and vehicle miles traveled (VMT) from the plan as well as the cumulative impacts. The analysis should include the greenhouse gas impacts of the following variables:

- Residential density
- Mix of uses
- Levels of housing affordability
- Proximity to transit
- Bicycle and Pedestrian amenities
- Decreased parking requirements
- Jobs/ Housing ratio

Then the Draft EIR should propose mitigations, including on-site mitigations, such as increasing density, decreasing parking, ensuring new development is within a half mile of a fixed transit station, etc.

Additionally, the analysis of land use scenarios should include the analysis of the true alternative. For example, if Scenario 1 includes 1000 new homes and Scenario 2 includes 700 new homes, the analysis of Scenario 2 must also analyze the impacts for where the additional 300 homes would be developed if not in the City, such as the associated greenhouse gas impacts.

Climate change is perhaps the most serious environmental threat facing California, and as the City of Santa Clara looks to 2035, it must plan to accommodate all projected new growth in a sustainable manner. Transportation accounts for nearly 50% of the region's greenhouse gases as people commute to jobs in Silicon Valley from as far as the Central Valley. It is critical that existing cities and towns accommodate new homes near jobs, services and public transit. And it is in times of a recession that planning for the future becomes ever more important.

If you have any questions regarding these comments, please contact me at 408.983.0856. Again, thank you for your consideration of these comments.

Sincerely,

Michele Beasley
South Bay Field Representative