



# City of Santa Clara

The Center of What's Possible

City of Cupertino, Community Development  
Department  
Attn: Piu Ghosh, Principal Planner  
10300 Torre Avenue  
Cupertino, CA 95014

July 9, 2018

Re: Draft the Environmental Impact Report (EIR) for the Vallco Special Area Specific Plan Project (File Number EA-2017-05)

Dear M. Ghosh:

Thank you for including the City of Santa Clara in the environmental review process for the Vallco Special Area Specific Plan Project ("Project"). City staff has reviewed the Environmental Impact Report (EIR) prepared for the development of a Specific Plan for the Vallco Special Area that would facilitate development of a minimum of 600,000 square feet of commercial uses, up to 2.0 million square feet of office uses, up to 339 hotel rooms, and up to 800 residential dwelling units within the Plan area. The following comments are provided following our review of the EIR.

## **Background Information**

In section 2.3 Background Information, page 10, it states that the Sand Hill Property Company filed an application pursuant to SB 35 (Government Code section 65913.4) at the Project's subject location. Please clarify whether or not the Sand Hill Property Company application will be covered under the Vallco Special Area Specific Plan Project EIR, or if there will be separate environmental clearance (CEQA).

## **Sewer Wastewater Treatment/Sanitary Sewer System**

The City of Cupertino's waste water service provider, Cupertino Sanitary District (CuSD) provides services to the City of Cupertino, portions of City of Saratoga, Sunnyvale, Los Altos, and surrounding unincorporated areas. Most of the Cupertino Sanitary District's waste water flows through the City of Santa Clara's sanitary sewer system. The EIR recognizes that the City of Santa Clara has an agreement with the CuSD, and per said agreement, the peak flow from CuSD is capped at 13.8 MGD, and the projected flow with the proposed Vallco Special Area Specific Plan (Project) would exceed the peak flow of 13.8 MGD. However; the EIR does not evaluate the sanitary sewer conveyance capacity impacts of the buildout of the Project to the City of Santa Clara's sanitary sewer system.

The EIR provides three mitigation measures (page 390, MM UTIL-2.1, MM UTIL-2.2, and MM UTIL-2.3), however; the impacts and mitigation measures are only for the CuSD's infrastructure. The evaluation needs to continue through the City of Santa Clara sanitary sewer system which takes the flow all the way to the treatment plant. Mitigation measure MM UTIL-2.3 does not address the impacts to the City of Santa Clara sanitary sewer system. The attached exhibit entitled, "Cupertino Sanitary District

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Interceptor Sewer Exhibit”, shows the City of Santa Clara’s major trunks that carry CuSD waste water.

An evaluation of the sanitary sewer conveyance capacity impacts of this Project to the City of Santa Clara’s sanitary sewer system is required and the results of the evaluation along with the mitigation measures need to be included in the EIR. To evaluate impacts, a Sanitary Sewer Hydraulic Model run analyzing the impacts of the buildout of the Project is needed. The modeling and analysis must be done by the City of Santa Clara. The CuSD staff must schedule a meeting with the City of Santa Clara Water and Sewer Utilities and Public Works staff to discuss the Project details, including the proposed flow data and diurnal curve from the CuSD and current sewage discharge capacity agreement between the City of Santa Clara and Cupertino Sanitation District. The sewer model run review process may take up to 4-6 weeks to complete the model run, evaluate impacts, and prepare an evaluation report after the \$8,844 fee is paid and the City of Santa Clara has been provided with all the required information (see the attached exhibit entitled, “Sewer Model Run Request Form”) to perform the sanitary sewer model run.

### **Transportation/Traffic**

Please see the attachment entitled, “Transportation/Traffic Comments” for comments on section 3.17 Transportation/Traffic pages 273, 288, 289, 311, 326, and 330. In addition, please verify if the latest CMP counts were used for the CMP intersections per the date of the NOP.

### **Conclusion**

Please revise the EIR and technical reports per the comments above. Should you have any questions regarding this letter, please contact Reena Brilliot, Planning Manager, via email at [rbrilliot@SantaClaraCA.gov](mailto:rbrilliot@SantaClaraCA.gov) or phone at 408-615-2452.

Best regards,



Andrew Crabtree  
Director of Community Development