

**From:** [Shani Kleinhaus](#)  
**To:** [Hill, Shannon](#)  
**Subject:** Scoping comments - Downtown West Mixed-Use Project  
**Date:** Friday, November 22, 2019 1:19:44 PM  
**Attachments:** [191122\\_SCVAS\\_scoping\\_Diridon-Google.pdf](#)

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**Dear Ms. Hill,**  
Please accept Santa Clara Valley Audubon Society scoping comments for the Notice of Preparation of a Draft Environmental Impact Report for the Downtown West Mixed-Use Project (Google Project) - attached  
Thank you,  
Shani

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Shannon Hill  
Department of Planning, Building and Code Enforcement  
City of San Jose  
Shannon.Hill@santoseca.gov

November 22, 2019

Re: Notice of Preparation for the Downtown West Mixed-Use Project (Google Project)

The Santa Clara Valley Audubon Society (SCVAS) submits the following comments in response to the City of San Jose Notice of Preparation of a Draft Environmental Impact Report for the Downtown West Mixed-Use Project (Google Project). The project will require a General Plan Amendment, Planned Development Rezoning, and Planned Development Permit for the development of up to 5,900 residential units; up to 7,300,000 gross square feet (GSF) of office space; up to 500,000 GSF of active uses such as retail, cultural, arts, etc.; up to 300 hotel rooms; up to 800 rooms of limited-term corporate accommodations; an approximately 100,000 GSF event center; up to two central utilities plants totaling approximately 115,000 GSF; and a logistics warehouse(s) of approximately 100,000 GSF; all on approximately 84 acres. The proposal also includes conceptual infrastructure, transportation, and public open space plans.

Here are our scoping comments:

1. Please provide in-depth description and characterize the baseline of the stream aquatic and riparian ecosystems and existing biological conditions along the Project reach of the Guadalupe River and Los Gatos Creek.
2. SCVAS is appreciative of the inclusion in the plan of expanded riparian setbacks along Los Gatos Creek. However, the San Jose Riparian Corridor Policy Study recommends a setback of 100-ft and we ask that impacts resulting from any encroachment into the 100-ft setback should be studied and analyzed.
3. Please analyze impacts of shading (from tall buildings) and glare (due to reflection from glass surfaces) on biological resources and the riparian forest of Los Gatos creek and the Guadalupe River.
4. Please analyze impacts to animal movement due to increased ambient lighting in the creek corridor. Please consider both indoor and outdoor lighting.

5. Please mitigate for use of outdoor LED lighting by using fixtures that produce Correlated Color Temperature (CCT) of no more than 3000. See <https://www.led-professional.com/resources-1/articles/hazard-or-hope-leds-and-wildlife> for additional recommendations.
6. Please study the risk of avian collision with buildings and other man-made structures.
7. Where new development encroaches into the 100-ft setback, we recommend the adoption of a "Habitat Overlay Zone" where the height of new buildings is limited to no more than 40-ft.
8. Please describe in full any anticipated work in Los Gatos Creek, and any flood mitigation "improvements". Please describe and analyze potential impacts to biological resources and the integrity of the riparian forest in Los Gatos Creek.
9. The Plan includes a new Bike-Pedestrian bridge across Los Gatos Creek. Please evaluate the biological and hydrological impacts of bisecting the creek with any new bridges, and consider avoiding such impacts by keeping all crossings to existing bridges. Please solicit comments from the California Department of Fish and Wildlife, the National Marine Fisheries Service the U.S. Fish and Wildlife Service and the U.S. Army Corps of Engineers for any new bridges.

We thank you for the opportunity to provide scoping comments for this project,

Respectfully



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