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February 14, 2025

Project No: 21-11808

Chris Sensenig

Raimi & Associates, Inc.

1900 Addison Street, #200

Berkeley, California 94707

Via email: chris@raimiassociates.com

**Subject: City of Milpitas Housing Opportunity Zone Project Supplemental Letter to the EIR
Addendum – Minor Project Revisions**

Dear Mr. Sensenig:

The purpose of this letter is to provide supplemental analysis to the City of Milpitas Housing Opportunity Zone Project Addendum, which was prepared in April 2024 and analyzes the potential impacts of the proposed Housing Opportunity Zone Project in relation to the analysis in the City of Milpitas General Plan Update EIR that was certified in 2021. The supplemental analysis is necessary to determine whether revisions to the proposed project that were made in January 2025 substantially affect the analysis or conclusions of the Addendum.

Summary of Proposed January 2025 Project Revisions

After gathering feedback from the community and holding discussions with landowners, the City re-evaluated the likely redevelopment scenario. This re-evaluation led to adjustments in the densities and sites involved in the project. The revised focus of this analysis considers a more conservative approach.

Changes outlined in the January 2025 Staff Recommended Zoning (henceforth referred to as “January 2025 zoning revisions”) compared to the proposed project as analyzed in the April 2024 Addendum (“Addendum”) include the following items:

- Reduction of dwelling units per acre (du/ac) in the NCMU district from 65 du/ac to 60 du/ac
- Reduction in maximum height in NCMU zones from 75 feet/6 stories to 60 feet/5 stories
- Increase of dwelling units per acre (du/ac) in the TC district from 55 du/ac to 65 du/ac

Comparison of January 2025 Project Revisions to the Addendum Analysis

The issue areas that were analyzed in the Addendum are discussed below with respect to the proposed project changes. No substantial changes have occurred in respect to environmental conditions; however, the projected overall number of net new residential units under the January 2025 zoning revisions has decreased compared to the Addendum analysis. The Addendum assumed a net increase of 266 residential units¹, and a net reduction of approximately 2,840,000 square feet of non-residential space overall compared to the General Plan EIR. The January 2025 zoning revisions assume reduced growth compared to the Addendum and would result in a maximum net decrease of

¹ 266 units = 317 units – 51 units

approximately 260 units², and a net reduction of approximately 2,840,000 square feet of non-residential space overall compared to the General Plan EIR.

The January 2025 zoning revisions compared to the Addendum and General Plan EIR buildout are shown below in Table 1. As shown therein, the Addendum anticipated approximately 2,908 new units compared to existing conditions across both districts. The January 2025 zoning revisions would result in approximately 2,156 new units compared to existing conditions across both districts. Accordingly, the proposed revisions would result in a decrease compared to the Addendum assumptions and would be within the General Plan EIR projections. Similarly, the net reduction of approximately 2,840,000 square feet of non-residential space remains unchanged from the project as analyzed in the Addendum and is consistent with the General Plan EIR projections.

Table 1 Buildout Compared to April 2024 Addendum and General Plan EIR

	Non-residential space (square feet)	Residential units (du)
TC		
Existing	1,426,803	0
General Plan EIR Buildout Assumption	1,600,000	1,064
April 2024 Addendum Buildout Assumption Proposed TC from existing (change from GP EIR)	-262,085 (Δ -0.44 million)	+1013 (Δ -51)
Staff Zoning Recommendation Proposed TC from existing (change from GP EIR)	-262,085 (Δ -0.44 million)	+786 (Δ -278)
NCMU		
Existing	987,077	0
General Plan EIR Buildout Assumption	3,200,000	1,578
April 2024 Addendum Buildout Assumption Proposed NCMU from existing (change from GP EIR)	-206,091 (Δ -2.4 million)	+1,895 (Δ +317)
Staff Zoning Recommendation Proposed TC from existing (change from GP EIR)	-206,091 (Δ -2.4 million)	+1,040-1,300 (Δ -538-278)

Δ = change

Source: Raimi & Associates 2025

²260 units = -538 units + 278 units

The issue areas analyzed in the Addendum, such as traffic, air quality, noise, and public services, were based on the assumption of a net increase of 266 residential units and a net reduction of approximately 2,840,000 square feet of non-residential space compared to the General Plan EIR. The January 2025 zoning revisions, however, project a reduced growth scenario with a maximum net decrease of approximately 260 residential units and the same net reduction of non-residential space. This reduction in residential units means fewer new residents, which translates to less demand on infrastructure, public services such as police, fire and library services, and utilities such as water supply and water and wastewater conveyance and treatment. Fewer residents would also result in reduced local vehicle and other trips. Consequently, the impacts on traffic congestion, vehicle miles travelled, air quality, greenhouse gas emissions, energy demand, noise levels, and public service demand would be similar to or reduced compared to those as previously analyzed. Additionally, since the ground disturbance and location of development would remain the same, the impacts to biological resources, cultural resources, hazards and hazardous materials, geology and soils, hydrology and water quality, and tribal cultural resources would also remain consistent with the analysis in the Addendum. The unchanged environmental conditions and the reduced buildout further support the conclusion that the impacts would not be more significant than those previously analyzed, and the conclusions of the Addendum remain valid.

Conclusion

In conclusion, the proposed zoning changes and the January 2025 zoning revisions would result in a reduced buildout compared to the Addendum analysis. This reduction in residential units and the consistency in non-residential space reduction ensure that the impacts would be less significant, as previously analyzed, and similar to or reduced compared to the Addendum conclusions. Additionally, the proposed changes are consistent with the overall land use and growth projections assumed within the General Plan EIR, which has already accounted for and mitigated potential environmental impacts. Since the environmental conditions have not changed since the April 2024 Addendum, the baseline conditions for analyzing impacts remain the same. Consequently, the reduced buildout further supports the conclusion that the impacts would be less significant, and the conclusions of the Addendum remain valid.

Sincerely,
Rincon Consultants, Inc.



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