DRAFT
INITIAL STUDY

630 Laurelwood Road
Digital LED Billboard Project

File No.: PLN2020-14594

City of Santa Clara
December 2021

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All appendices are incorporated by reference into this Initial Study. No other documents are incorporated by reference.

SECTION 1.0 INTRODUCTION AND PURPOSE

This Initial Study is being prepared to conform to the requirements of the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.), the CEQA Guidelines (California Code of Regulations 15000 et seq.), and the regulations and policies of the City of Santa Clara. This Initial Study evaluates the reasonably foreseeable environmental impacts which may result from the removal of two existing billboard structures, and the construction of a new LED digital billboard, adjacent to US 101.

The City of Santa Clara is the Lead Agency under CEQA and has prepared this Initial Study to address the impacts of implementing the proposed project.

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SECTION 2.0 PROJECT INFORMATION

2.1 PROJECT TITLE

630 Laurelwood Road LED Digital Billboard Project

2.2 PROJECT LOCATION

The project site is located at 630 Laurelwood Road (Assessor's Parcel Number [APN] 101-13-004) adjacent to and east of the northbound lanes of US 101 in the City of Santa Clara.

2.3 LEAD AGENCY CONTACT

Tiffany Vien
Community Development – Planning Division
City of Santa Clara
1500 Warburton Avenue
Santa Clara, CA 95050

2.4 PROPERTY OWNER/PROPONENT

Owner:
Candess Wing
Public Storage
701 Western Avenue
Glendale, CA 91201

Applicant:
Bryan Scott
Outfront Media
1695 Eastshore Highway
Berkeley, CA 94710

2.5 ASSESSOR'S PARCEL NUMBERS

The proposed LED digital billboard site at 630 Laurelwood Road would be located on APN 101-13-004. Sites where billboards are proposed for removal or have been removed in connection with the proposed project are located on APN 220-32-056 (2983 El Camino Real, Santa Clara), APN 224-60-003 (2550 Lafayette Street, Santa Clara), and APN 296-637-035 (4545 Stevens Creek Boulevard, Santa Clara). In addition, in order to comply with California Business and Professions Code Section 5443(b)(2) and obtain the Outdoor Advertising permit from the California Department of Transportation, one of the following two panels along landscaped freeway sections would be removed or replaced: (1) Panel # 2071, associated with Caltrans Permit No. 28162, located along Highway 101 near Post-mile 1.48L in the City and County of San Francisco (APN 5449-027, 2629 San Bruno Avenue); or (2) Panel # 2310, associated with Caltrans Permit No. 28164, located along Highway 580 near Post-mile 39.97R in the County of Alameda (APN 030-1976-013, 4580 MacArthur Boulevard, Oakland). The proposed project would also entail the

removal of an existing on-premise sign with two facings located on the project site (630 Laurelwood Road); similar on-premise signage would be included on the new billboard structure below the proposed off-premise digital facing.

2.6 ZONING DISTRICT AND GENERAL PLAN DESIGNATIONS

630 Laurelwood Road - Proposed LED Digital Billboard Site:

Zoning District: *ML – Light Industrial*

General Plan: *Light Industrial*

Billboards proposed for removal or previously removed in connection with the project:

Location	Zoning	General Plan Designation
2983 El Camino Real (easterly oriented face)	*CT – Thoroughfare Commercial*	*Community Mixed Use*
2550 Lafayette Street (one facing)	*MH – Heavy Industrial*	*Heavy Industrial*
4545 Stevens Creek Boulevard (two facings)	*CT – Thoroughfare Commercial*	*Regional Commercial*
2629 San Bruno Avenue, San Francisco (one facing) *-or-* 4580 MacArthur Boulevard, Oakland (one facing)	*San Bruno Avenue Neighborhood Commercial District (NCD)* *CN-3 Neighborhood Center Commercial - 3 Zone*	*Neighborhood Commercial District* *Neighborhood Center Mixed Use*

SECTION 3.0 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

The project would construct a single-sided billboard at 630 Laurelwood Road (APN 101-13-004), adjacent to the northbound lanes of US 101, and remove two existing billboard facings, in addition to the three additional off-premise advertising facings previously removed and "banked" pursuant to an agreement with the City, as detailed below (**Figures 1** and **2**). In addition, the existing on-premise sign with two facings advertising the Public Storage business that currently operates on the project site would be removed from the project site. The new billboard would be located within an existing paved area near the southern boundary of the property currently developed with storage buildings. The structure would be single-sided with a southeast facing LED[1] display that would be visible to vehicles traveling northbound on US 101. The column for the proposed billboard structure would incorporate similar on-premise signage advertising the Public Storage business, effectively replacing the existing on-premise signage.

The proposed LED digital billboard display would cycle through a rotation of static images, changing once every eight seconds, and would be used primarily for commercial advertisements. The sign would operate 24 hours per day, seven days per week. Other uses for the sign could include promoting community events, highlighting public awareness campaigns, and broadcasting emergency messages when necessary. The billboard would not show video or motion, nor would it emit noise or audio. The project does not propose to change the existing land use of the project property.

As described below in Section 3.2.1, *Discretionary Actions/Regulatory Framework*, the project requires approval of a Use Permit and a Billboard Relocation Agreement from the City of Santa Clara.

3.2 PROJECT COMPONENTS

3.2.1 Required Approvals/Regulatory Framework

The proposed LED digital billboard would be located on a site zoned ML – *Light Industrial*. Billboards are not expressly identified as a permitted use in the ML – *Light Industrial* zone. The project would, therefore, require approval of a Use Permit from the City of Santa Clara. The proposed billboard would be 60 feet in height which would exceed the City's maximum height limit of 35 feet for outdoor signs (Santa Clara City Code, Chapter 18.80.050). A text amendment is proposed to the Zoning Ordinance that would allow digital billboard signs to exceed the height limit in Section 18.80.050 with a Use Permit. The project includes a Use Permit that would allow the proposed billboard height of 60 feet. The project would also require approval of a Relocation Agreement between the City and project applicant (Outfront Media), as well as approval of a

[1] An LED (Light Emitting Diode) is a device that emits visible light when an electric current passes through it. LED devices can output a range of colors. LED lights are low-power, high-efficiency, and long-lasting when compared to traditional incandescent and fluorescent lighting.

Regional Map

Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

Date	Figure
04 -27 -21	1

Path: P:\DDA Current Projects\2021-22 Outfront Billboard\CEQA\Project Description\Figures

Project Location

Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

Date: 04-28-21
Scale: 1 in = 1,920 ft
Figure: 2

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ministerial Outdoor Advertising Permit by Caltrans and ministerial approvals from the City, including grading and building permits.

The City of Santa Clara has determined that billboards, by their very nature, however constructed, constitute visual clutter and blight to the appearance of the City. It is the intent of the City to gradually reduce the overall number of billboards by limiting the number of billboards in Santa Clara and prohibiting the construction of new billboards (Santa Clara City Code, Chapter 18.80, *Sign Regulations*). Section 18.80.221 of the City Code stipulates that the City may enter into agreements to allow for the relocation of existing outdoor advertising displays. The Billboard Relocation Agreement for the proposed project requires, ultimately, the removal of four existing billboard facings in exchange for the installation of the proposed single-sided LED digital billboard at a new location within the City. The City considers this "planned development" for purposes of Section 5412 of the Outdoor Advertising Act and its authorization of outdoor advertising display relocations. Existing on-premise signage would effectively be replaced by incorporating on-premise signage into the new sign structure as detailed below.

The California Department of Transportation (Caltrans) *Outdoor Advertising Act and Regulations 2014 Edition* (Outdoor Advertising Act) addresses illumination generated by advertising displays by stating that displays may not "interfere with the effectiveness of, or obscure any official traffic sign, device, or signal…nor shall any advertising display cause beams or rays of light to be directed at the traveled ways if the light is of an intensity or brilliance as to cause glare or to impair the vision of any driver, or to interfere with any driver's operation of a motor vehicle."[2] The Caltrans regulations do not include formal requirements regarding brightness or light intensity of advertising signs. The project therefore commits to a maximum ambient light[3] output level of 0.3 footcandles[4] at a distance of 250 feet from the billboard, as recommended by the Outdoor Advertising Association of America (OAAA) for a sign of the proposed size.[5] The light levels emitted from the billboard would be set to adjust based upon ambient light conditions at any given time (i.e., nighttime versus daytime). Caltrans regulations prohibit images on signs from changing more than once every four seconds.[6] The proposed billboard would rotate images once every eight seconds.

Illuminated signs could be considered a traffic safety hazard given the potential of light and glare to distract drivers. The project, therefore, must comply with the requirements of Chapter 18.80, *Sign Regulations* of the Santa Clara City Code, the Caltrans Outdoor Advertising Act, and Section 21466.5 of the California Vehicle Code (which defines State limits for the brightness of light sources unnecessary along roadways). These regulations set forth design standards for billboards with the primary purpose of minimizing impacts related to traffic safety.

[2] Standards for Advertising Displays in Business Areas, Business and Professions Code §5408(b).
[3] Ambient lighting is a general illumination that comes from all directions where there is no defined source.
[4] A footcandle is the measure of light intensity on a horizontal surface.
[5] The OAAA recommended standards follow the criteria established by the Illuminating Engineering Society of North America (IESNA) and is based upon the publication *American National Standard Practice for Roadway Lighting*.
[6] The Caltrans Outdoor Advertising Act allows messages to change every four seconds. Business and Professions Code §5408(b).

3.2.2 Proposed LED Digital Billboard at 630 Laurelwood Road

The new proposed digital outdoor display sign would be 60 feet tall with one LED digital screen that measures 14 feet tall by 48 feet wide (**Figure 3**). The display on the billboard would be mounted on a supporting column. The above-ground column supporting the billboard would be approximately 60 feet tall. The billboard frames would be equipped with upper and lower rear catwalks measuring approximately 2.5 feet wide and extending along the length of the back of the billboard. Access to the catwalks would be via ladder. The total advertising surface area would be 672 square feet (sf).

The foundation used for the proposed structure would be a drilled shaft with a poured concrete footing. The column foundation would be five feet (5) in diameter and would extend to a depth of 57 feet below the ground surface. The LED screen would be black when not operating, and the supporting column would be painted with high-gloss black industrial enamel.

The billboard would be equipped with sensors that modify the brightness of the sign in response to ambient lighting conditions. Adjustments to the sign brightness would occur gradually, to prevent a sudden change in perceptible brightness levels by pedestrians and motorists. The sign would dim slowly at dusk over a 45-minute fade rate, controlled by an atomic clock.

The billboard display would be changed remotely using a network operating center that manages content and performance of all displays.

The proposed billboard would be connected to existing power in the project area. The proposed LED digital billboard would be illuminated 24 hours per day, 365 days per year. The light levels emitted from the billboard would be set to adjust based upon ambient light conditions at any given time (i.e., nighttime versus daytime). The LED facing would be used for a total of 8,760 hours per year, which would require the use of approximately 26.4 megawatt-hours (MWh) (26,000 kilowatt-hour [kWh]) of electricity annually.

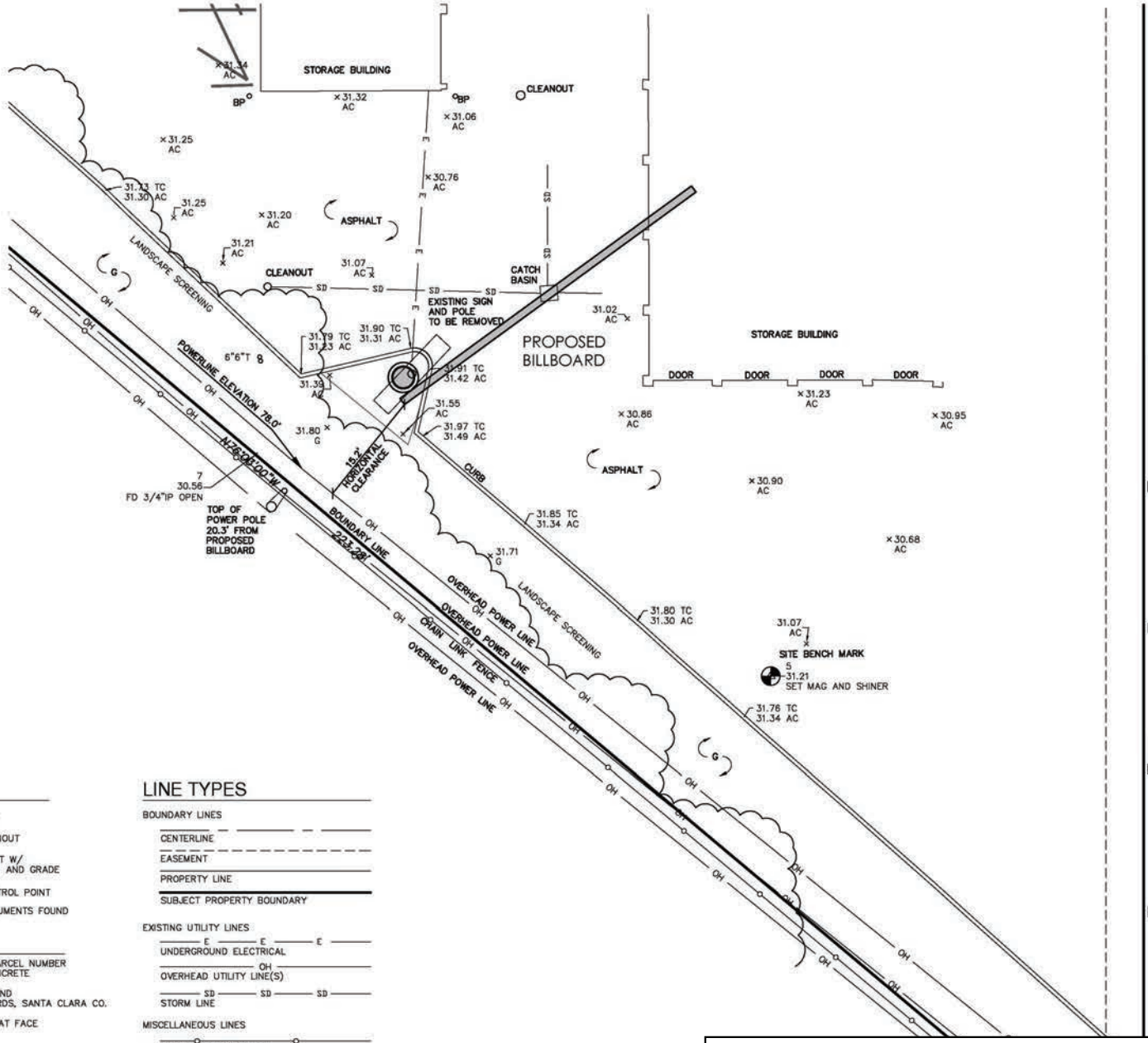
The proposed billboard construction would not impact trees onsite and maintenance pruning associated with the visual clearance on an annual basis would be anticipated to be less than the maximum allowable limits for pruning (i.e., pruning less than 25% of the live crown per year).

The on-premise Public Storage signage would be similar to currently existing signage, and would be co-located on the same structure as the proposed digital display, with the top of the on-premise signage reaching a height of approximately 35 feet, which would have two facings measuring eight feet tall by twelve feet wide (for a total surface area of 192 sf) (**Figure 4**).

Sign construction would take approximately five to seven days to complete and would require up to 45 cubic yards of soil-off haul. Ground water and drilling fluids would be removed by utilizing 10,000-gallon water trucks, and spoils would be hauled to the Ox Mountain Sanitary Landfill at 12310 San Mateo Road, Half Moon Bay, CA 94019.

SITE DETAIL: SCALE 1" = 10'

0 10 20 Feet



SYMBOLS

- BENCHMARK
- SEWER CLEANOUT
- ×100.00 AC / AC 100.00 • SURVEY POINT W/ DESCRIPTION AND GRADE
- SURVEY CONTROL POINT
- SURVEY MONUMENTS FOUND

LEGEND

APN	ASSESSOR'S PARCEL NUMBER
AC	ASPHALTIC CONCRETE
BP	BOLLARD
G	NATURAL GROUND
O.R.	OFFICIAL RECORDS, SANTA CLARA CO.
T	TREE
TC	TOP OF CURB AT FACE

LINE TYPES

BOUNDARY LINES
- CENTERLINE
- EASEMENT
- PROPERTY LINE
- SUBJECT PROPERTY BOUNDARY

EXISTING UTILITY LINES
- E — E — E — UNDERGROUND ELECTRICAL
- OH — OVERHEAD UTILITY LINE(S)
- SD — SD — SD — STORM LINE

MISCELLANEOUS LINES
- CHAIN LINE FENCE LINE
- CURB
- STRIPING
- BUILDING FOOTPRINT

Site Plan

Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

Date 05-12-21

Scale 1 in = 10 ft

Figure 3

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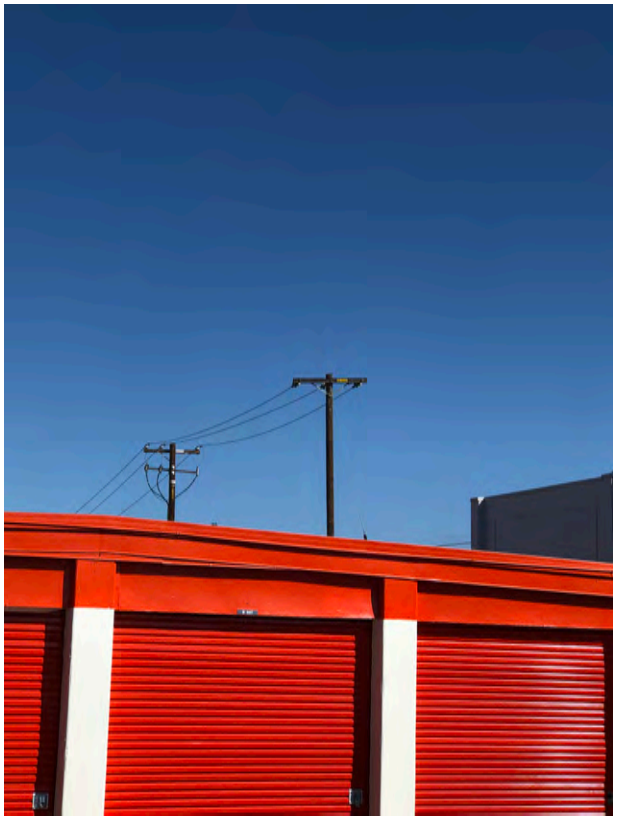
Proposed project site looking north.



Proposed project site looking east.

Proposed project site looking south.

Title: Site Photos

Source: Denise Duffy & Associates, May 2021

Date 2021
Scale N/A
Project 2021-22

Monterey | San Jose
Denise Duffy and Associates, Inc.
Environmental Consultants Resource Planners
947 Cass Street, Suite 5
Monterey, CA 93940
(831) 373-4341

Figure 4

3.2.3 Removal of Existing Billboards

In compliance with the Billboard Relocation Agreement, the project would remove one existing billboard facing within the City in addition to the three billboard facings previously removed ("banked") in connection with this project. In addition, in order to comply with California Business and Professions Code Section 5443(b)(2) and obtain the Outdoor Advertising permit from the California Department of Transportation, one of the following two panels along landscaped freeway sections would be removed or replaced: (1) Panel # 2071, associated with Caltrans Permit No. 28162, located along US 101 near Post-mile 1.48L in the City and County of San Francisco (APN 5449-027, 2629 San Bruno Avenue); or (2) Panel # 2310, associated with Caltrans Permit No. 28164, located along Highway 580 near Post-mile 39.97R in the County of Alameda (APN 030-1976-013, 4580 MacArthur Boulevard, Oakland). The project also involves the removal of existing on-premise signage, consisting of two Public Storage facings, located on the project site, as described above.

Hand tools and small crane rigs would be used to remove the billboard faces. The top of the billboards would first be disassembled and removed, and then any supporting equipment. Materials from the removed billboard facings would be reused by Outfront Media or delivered to a recycling facility and/or appropriate landfill.

It would take approximately one to two working days to remove each of the existing billboard faces and the on-premise signage for a total construction duration of approximately two to four working days.

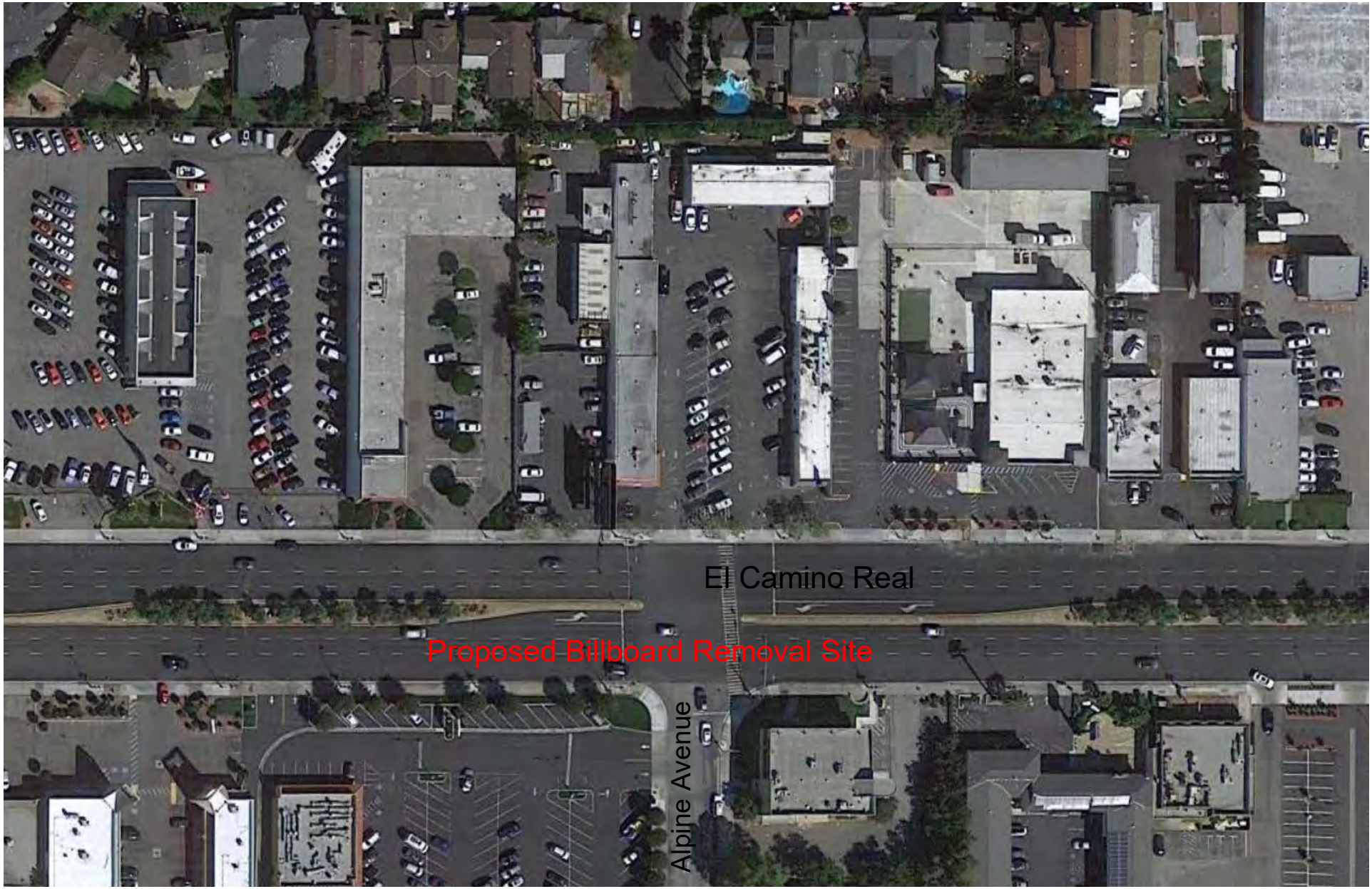
3.2.3.1 *2983 El Camino Real*

The billboard at 2983 El Camino Real (APN 220-32-056) is located on the north side of the roadway, near the intersection of Alpine Avenue and El Camino Real (**Figure 5a**). The billboard is on a property used for retail/commercial. The site is bound by commercial uses to the east and west, residential to the north, and a mix of uses to the south including commercial and residential. One sign face (oriented toward the east) of the existing two-sided billboard would be removed.

3.2.3.2 *2550 Lafayette Street*

The billboard at 2550 Lafayette Street (APN 224-60-003), recently removed in conjunction with the proposed project,[7] was located on the west side of the roadway, near the intersection of Lafayette Street and Martin Avenue. The billboard was on a property used for industrial/commercial. The site is bound by industrial/commercial uses to the east, west, north, and south. The sign structure had one single-faced billboard. This sign was removed consistent with the Billboard Banking Agreement between the City and the applicant dated May 11, 2017, as amended.

[7] This sign was removed in connection with a separate billboard banking agreement, which allowed the applicant to bank the sign faces at 4545 Stevens Creek Boulevard.



0 100 200 ft

N

2983 El Camino Real

Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

Date
07-20-21

Scale
1 in = 100 ft

Figure
5a

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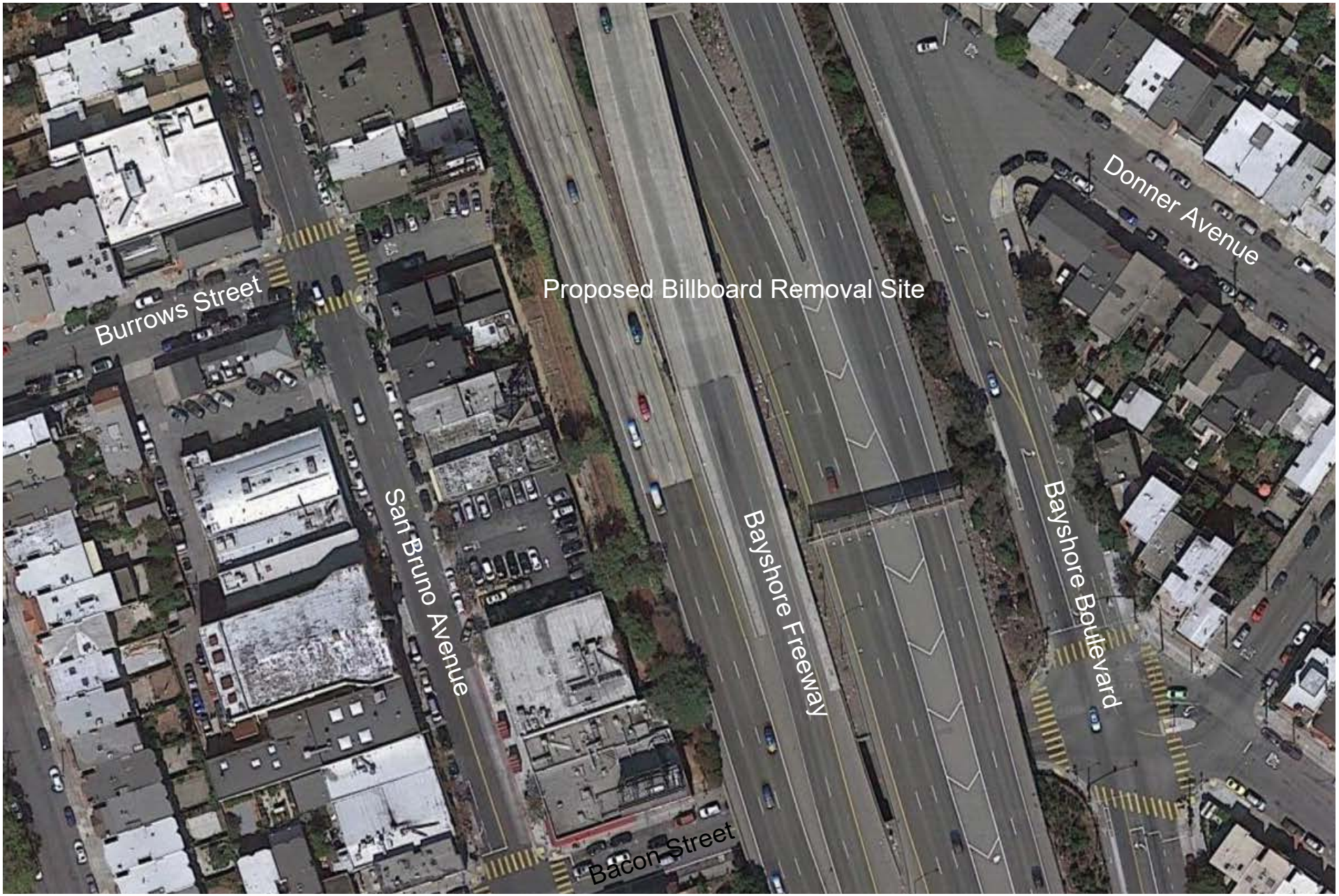
3.2.3.3 *4545 Stevens Creek Boulevard*

Two additional facings, located at 4545 Stevens Creek Boulevard, were previously removed by the applicant and banked toward the placement of the proposed billboard, consistent with the Billboard Banking Agreement between the City and the applicant dated May 11, 2017, as amended.

3.2.3.4 *2629 San Bruno Avenue, San Francisco or 4580 MacArthur Boulevard, Oakland*

The sign in San Francisco is situated on the roof of a commercial building in a mixed-use district next to U.S. 101 and consists of a single facing (**Figure 5b**). The sign in Oakland is located on a vacant parcel, on the north side of the roadway between 4560 and 4600 MacArthur Boulevard (**Figure 5c**). The parcel is situated between a church and a residence. The sign structure consists of one single facing visible to vehicles traveling northbound on MacArthur Boulevard. Either the San Francisco or Oakland sign would be removed by the applicant as a component of the proposed project.



0 100 200 ft

N

2629 San Bruno Avenue

Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

Date 07-20-21

Scale 1 in = 100 ft

Figure 5b

Path: C:\GIS\GIS Templates\Jan2013\8x11 Landscape.mxd

0 100 200 ft

N

4580 MacArthur Boulevard

Denise Duffy and Associates, Inc.
Planning and Environmental Consulting

Date 07-20-21

Scale 1 in = 100 ft

Figure 5c

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SECTION 4.0 ENVIRONMENTAL CHECKLIST AND DISCUSSION OF IMPACTS

This section describes the existing environmental conditions on and near the project area, as well as environmental impacts associated with the proposed project. The environmental checklist, as recommended in the California Environmental Quality Act (CEQA) Guidelines, identifies environmental impacts that could occur if the proposed project is implemented.

The right-hand column in the checklist lists the source(s) for the answer to each question. The sources cited are identified at the end of this section. Mitigation measures are identified for all significant project impacts. "Mitigation Measures" are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guideline 15370). Measures that are proposed by the applicant that will further reduce or avoid already less than significant impacts are categorized as "Avoidance Measures."

4.1 AESTHETICS

4.1.1 Setting

4.1.1.1 *Proposed LED Digital Billboard Site*

The project consists of the construction and operation of a new single-sided billboard at 630 Laurelwood Road (APN 101-13-004), adjacent to the northbound lanes of US 101. Distant views of the Diablo Mountain range are visible to the east from US 101. Views of the north end of the runway of the Norma Y. Mineta San Jose International Airport are visible to the south from US 101. The project site and surrounding areas to the north, east, south, and west are flat and fully developed with buildings and paved lots used for industrial and office purposes. Vegetation in the vicinity of the project site consists of landscaped areas with shrubs, grass, and street trees. The new LED digital billboard would be located within an existing paved parking lot at the southern boundary of a property developed with storage buildings. The proposed billboard would be located immediately adjacent to the existing Public Storage sign, which would be removed, and two existing storage buildings and landscaping.

Laurelwood Road is located to the north of the project property. Laurelwood Road is a two-lane road with a sidewalk on the south side and no median. A chain linked fence with small shrubs and trees separates the project site from US 101 to the south. US 101 in the vicinity of the project site has a total of ten lanes (i.e., four lanes in each direction, an onramp on the northbound side, and an offramp on the southbound side). The highway has several billboard facings oriented to be visible from vehicles travelling in both directions.

The proposed billboard would be designed using LED digital technology. The new proposed digital outdoor display sign would be 60 feet tall with one LED screen that measures 14 feet tall by 48 feet wide. The display on the billboard would be mounted on a supporting column. The above-ground column supporting the billboard would be approximately 45 feet tall. The billboard frame would hold a single-sided LED digital billboard display that would cycle through a rotation of static images, changing once every eight seconds. The structure would be single-sided with a

southeast facing LED display that would be visible to vehicles traveling northbound on US 101. The column for the proposed billboard structure would also incorporate the on-premise Public Storage sign, which would have two facings measuring eight feet tall by twelve feet wide (for a total surface area of 192 sf). The total off-premise advertising surface area would be 672 sf. The billboard frame and elevation details are shown in **Figure 3**.

4.1.1.2 *Existing Billboards Proposed for Removal*

In compliance with the Billboard Relocation Agreement, the proposed project would include the removal of one existing billboard facing from a local street within the City (i.e., El Camino Real) in addition to the three billboard facings previously removed in connection with this project (one facing on Layfette Street and two facings on Stevens Creek Boulevard) within the City. In addition, in order to comply with California Business and Professions Code Section 5443(b)(2) and obtain the Outdoor Advertising permit from Caltrans, the proposed project would include the removal of one existing single-facing billboard within San Francisco or Oakland. These billboards are located in flat, built-out areas of the city developed with commercial/retail, industrial, and residential land uses. Vegetation in the vicinity of the billboards proposed for removal or recently removed consists of urban landscaped areas. The billboard locations are shown in **Figures 5a – 5c**.

The one sign face of the existing two-sided billboard on El Camino Real proposed for removal is visible to eastbound drivers on this road, which is a major east/west, six lane arterial roadway in the vicinity of the project site. The single-sided billboard recently removed on Lafayette Street was visible to northbound drivers on Lafayette Street, a local north/south, two lane roadway. The two-sided billboard recently removed on Stevens Creek Boulevard was visible to: east- and westbound drivers on Stevens Creek Boulevard, a six lane arterial roadway; southbound drivers on Woodhams Road, a local north/south, two lane roadway; and northbound drivers on Palace Drive, a local north/south, two lane roadway. The single-sided billboard that may be removed on San Bruno Avenue in San Francisco is visible to northbound drivers on US 101, a ten lane highway. The single-sided billboard that may be removed on MacArthur Boulevard is visible to westbound drivers on MacArthur Boulevard, a local two lane roadway, and visible to westbound drivers on Interstate 580, an eight lane interstate highway. As stated above, either the San Francisco or Oakland sign would be removed as a component of this project.

4.1.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
AESTHETICS. Would the project:					
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒	1
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐	1
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐	1, 2, 3
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐	1, 2, 3, 4

4.1.3 Aesthetic Impacts

4.1.3.1 *Scenic Vistas and Resources*

No designated scenic vistas are located within the City. **(No Impact)**

Due to the flat topography and surrounding development, views of the proposed billboard site are limited to the immediate area.

Views of hillsides from southbound US 101 are modified by development on both sides of US 101. The proposed billboard would be setback from the highway, adjacent to the buildings at 630 Laurelwood and would blend in with the existing developed character of the project area. It would modify local views of scenic hillsides from the highway; however, it would not substantially intrude on views from northbound or southbound US 101. It would not directly affect scenic resources, such as trees or outcrops along a scenic highway, or block views of visual resources. **(Less Than Significant Impact)**

4.1.3.2 *Visual Character*

Proposed Billboard Removals

The City of Santa Clara has determined that billboards, by their very nature, however constructed, constitute visual clutter and blight to the appearance of the City. The intention of the City is to limit and reduce the number of billboards in order to "improve the quality of urban life for its citizens." The Billboard Relocation Agreement for the proposed project requires the removal of

four existing billboard facings on local City streets, in exchange for the installation of the proposed single-sided billboard along US 101. The project would result in an overall reduction of billboard facings within the City, and the relocation of advertisements from local City streets to US 101 where advertisements would be largely directed at through-traffic rather than locals. The proposed billboard would conform to current standards and could be considered a higher quality structure than the existing, older billboards with typical advertising faces and outdated billboard technology. The project would result in a beneficial impact to the existing visual character of the City by removing four existing billboard facings in addition to one existing billboard facing to obtain the Outdoor Advertising permit from the California Department of Transportation, and constructing one new facing on US 101. **(Less Than Significant Impact)**

Proposed LED Digital Billboard

The project area along the US 101 corridor is developed with industrial and commercial buildings, on-site commercial signs, and aboveground infrastructure, including power lines and an illuminated sign on the neighboring southeast parcel. Installation of a 60-foot LED digital billboard would add an additional structure conveying commercial messages to a developed area visible from a heavily traveled highway. Although the billboard would be 25 feet higher than the City's maximum allowable sign height of 35 feet, a 60-foot billboard would blend in with the existing developed character in the project area, which consists of commercial and industrial buildings, as well as telecommunication towers, highway lamps, directional signage, and on-premise signage of similar heights, and a text amendment is proposed for the Zoning Ordinance that would allow for taller digital billboard signs with the issuance of a Use Permit (**Figure 4**). The project will conform to the requirements of Chapter 18.80, *Sign Regulations* of the Santa Clara City Code, the Caltrans Outdoor Advertising Act, and Section 21466.5 of the California Vehicle Code. While there are other digital signs east of the project area, the proposed billboard would be approximately 2,000 feet from the closest LED digital billboard on northbound US 101. The billboard would be generally compatible with the existing industrial and commercial character of the area. The proposed billboard would not, therefore, substantially degrade the existing visual character or quality of the project site or its surroundings nor would it conflict with applicable zoning or other regulations governing scenic quality. **(Less Than Significant Impact)**

4.1.3.3 *Night and Glare/Nighttime Lighting*

Caltrans stipulates in Section 5405(d)(1) of the Outdoor Advertising Act that "no message center display may include any illumination or message change that is in motion or appears to be in motion or that changes in intensity or exposes its message for less than four seconds." In compliance with Caltrans requirements and Santa Clara City Code Section 18.80.220(b)(2), the proposed billboard would not include moving images or sound. Static images on the billboard would change once every eight seconds.

Illuminated signs could be considered a traffic safety hazard given the potential of light and glare to distract drivers. The California Vehicle Code addresses illumination by stating that "no person shall place or maintain or display, upon or in view of any highway, any light of any color of such brilliance as to impair the vision of drivers upon the highway." The Vehicle Code regulates illumination by placing limits on maximum light output. The Code generally considers a light source to be impairing when the light source exceeds 1,000 times the minimum measured

brightness in a driver's field of view, within 10 degrees of that field of view. The proposed LED digital billboard would not exceed this threshold. Light levels emitted from the billboard would adjust to respond to ambient conditions and thereby avoid excessive brightness.

The City Code states that no sign shall be permitted with illumination that is "brilliant, scintillating, or flashing, and is visible from any highway and so positioned to blind or dazzle the vision of travelers on such highways." Caltrans addresses illumination generated by advertising displays by stating that displays may not "interfere with the effectiveness of, or obscure any official traffic sign, device, or signal… nor shall any advertising display cause beams or rays of light to be directed at the traveled ways if the light is of an intensity or brilliance as to cause glare or to impair the vision of any driver, or to interfere with any driver's operation of a motor vehicle." While both the City and Caltrans stress the importance of limiting light and glare for the safety of drivers, neither agency defines formal requirements regarding brightness or light intensity of advertising signs. The most conservative brightness limit with which the proposed billboard would have to comply is 500-foot lamberts,[8] which is equivalent to 1713 nits. The project proposes to operate the sign's nighttime limit at about 300 nits (which equates to 0.3 footcandles at 250 feet),[9] meaning that the sign would always operate at one-sixth of the brightness level for Changeable Electronic Message signs (CEVMs), as set forth by state law. Additionally, as mentioned above, the light levels emitted from the billboard would be set to adjust based upon ambient light conditions at any given time (i.e., nighttime versus daytime).

The project would comply with the requirements of Chapter 18.80, *Sign Regulations* of the Santa Clara City Code, the Caltrans Outdoor Advertising Act, and Section 21466.5 of the California Vehicle Code. These regulations set forth design standards for billboards with the primary purpose of minimizing traffic safety hazards. With compliance to these regulations, the project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. **(Less Than Significant Impact)**

4.1.4 Conclusion

The project would be located in an urban area. The project would not have a substantial adverse effect on a scenic vista or damage scenic resources within the City. Although the billboard would be 25 feet higher than the City's maximum allowable sign height of 35 feet, a 60-foot billboard would blend in with the existing developed character in the project area, and a text amendment is proposed for the Zoning Ordinance that would allow for taller digital billboard signs with the issuance of a Use Permit. Installation of the proposed billboard would not substantially affect the visual character or quality of the area surrounding the project site. With conformance to the requirements of Chapter 18.80, *Sign Regulations* of the Santa Clara City Code, the Caltrans Outdoor Advertising Act, and Section 21466.5 of the California Vehicle Code, and a maximum light output level of 0.3 footcandles, the project would not create adverse levels of light or glare. Due to the flat topography of the project area and surrounding development, views of the project site would be limited and the project would not substantially affect views of the site from

[8] This calculation assumes a minimum measures brightness in the field of view of less than 10 foot-lamberts, and a view angle of zero degrees (i.e., directly in front of the driver).

[9] Setting a standard in foot candles is a more appropriate metric by which to judge impacts on sensitive receptors, as a foot candela measures light intensity experience at the receptor, whereas measurement in candela/square meters or nits reveals only the intensity of light at its source.

surrounding areas. In addition, for these reasons, the proposed project would not result in significant aesthetic impacts. **(Less Than Significant Impact)**

Removal of the five billboard facings in conjunction with the project (four facings in accordance with the Billboard Relocation Agreement and one facing in compliance with the California Business and Professions Code) would improve the overall visual character of the area. **(Less Than Significant Impact)**

4.2 AGRICULTURAL AND FOREST RESOURCES

4.2.1 Setting

The California Department of Conservation Farmland Mapping and Monitoring Program (FMMP), established by the State Legislature in 1982, assesses the location, quality, and quantity of agricultural lands. In addition, the FMMP monitors the conversion of these lands over time. In each county, the land is analyzed for soil and irrigation quality and the highest quality land is designated as *Prime Farmland*.

The California Department of Conservation's *California Important Farmland Finder* and the *Santa Clara County Important Farmland 2018 Map* designate the project site and sites with billboards proposed for removal as *Urban and Built-Up Land*, which is defined as land occupied with a building density of one unit on 1.5 acres or approximately six structures per 10-acre parcel. Common examples of *Urban and Built-Up Land* are residential, industrial, commercial purposes, golf courses, landfills, airports, and other utility uses. No land adjacent to any of the sign sites is designated or used as farmland. The LED digital billboard and signs proposed for removal are not located on properties that meet the definition of forest land or timberland.[10] The sites are not designated by the California Natural Resources Agency as farmland of any type and they are not the subject of a Williamson Act contract. There is no forest land on or adjacent to the project site or the properties with signs proposed for removal.

[10] According to California Public Resources Code Section 12220(g), Forest Land is land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. According to California Public Resources Code Section 4526, "Timberland" means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees.

4.2.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
AGRICULTURAL AND FOREST RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒	1, 2, 5
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒	1, 2, 5
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)?	☐	☐	☐	☒	1, 2, 5
d) Result in the loss of forest land or conversion of forest land to non-forest uses?	☐	☐	☐	☒	1, 2, 5
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒	1, 2, 5

4.2.3 Agricultural and Forestry Resources Impacts

As discussed above, the proposed LED digital billboard sign and signs proposed for removal are located on properties which are designated, developed, and zoned for urban uses. The sign properties are not designated, used, or zoned for agricultural, forest, or timberland purposes. The sign properties are not part of a Williamson Act contract. The proposed LED digital billboard and signs proposed for removal are surrounded by urban development and, therefore, the project would not result in the conversion of agricultural land to non-agricultural uses or forest land to non-forest uses. For these reasons, the project would not impact agricultural and forestry resources. **(No Impact)**

4.2.4 Conclusion

The project would not result in any significant impacts to agricultural or forest resources. **(No Impact)**

4.3 AIR QUALITY

4.3.1 Setting

4.3.1.1 *Climate and Topography*

The City of Santa Clara is located in the San Francisco Bay Area Air Basin (SFBAAB), in a portion of the Santa Clara Valley bounded by the San Francisco Bay to the north, Santa Cruz Mountains to the southwest, and the Diablo Range to the east. The surrounding terrain greatly influences winds in the valley. Prevailing winds follow the valley's northwest-southwest axis.

4.3.1.2 *Regional and Local Criteria Pollutants*

Major criteria pollutants, listed in "criteria" documents by the U.S. Environmental Protection Agency (U.S. EPA) and the California Air Resources Board (CARB) include ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and suspended particulate matter (PM). These pollutants can have health effects such as respiratory impairment and heart/lung disease symptoms.

Violations of ambient air quality standards (AAQS) are based on air pollutant monitoring data and are judged for each air pollutant. SFBAAB attainment status for National and California AAQS can be found in **Table 4.3-1** below. The SFBAAB area is currently designated as a nonattainment area for the State and Federal ozone, State and Federal particulate matter 2.5 microns in diameter ($PM_{2.5}$), and State particulate matter 10 microns in diameter (PM_{10}). The SFBAAB is designated attainment or unclassified for all other pollutants.

Table 4.3-1
San Francisco Bay Area Air Basin Attainment Status – January 2017

Pollutant	State Standards[1]	National Standards
Ozone (O_3)	**Nonattainment**	**Nonattainment[2]**
Inhalable Particulates (PM_{10})	**Nonattainment**	Unclassified
Fine Particulates ($PM_{2.5}$)	**Nonattainment**	**Nonattainment[3]**
Carbon Monoxide (CO)	Attainment	Attainment
Nitrogen Dioxide (NO_2)	Attainment	Attainment
Sulfur Dioxide (SO_2)	Attainment	Attainment[6]
Lead	Attainment	Attainment

Notes:
1) The design value is a statistic based on the monitored concentrations that can be compared with the corresponding standard. The standard is violated if the design value exceeds the standard. Design values are computed on a site-by-site basis. Air District design value is the highest design value at any individual monitoring site.
2) U.S. EPA lowered the national 8hour ozone standard from 0.075 to 0.070 PPM (or 70 ppb) in October 2015.
3) U.S. EPA tightened the national 24-hour $PM_{2.5}$ standard from 65 to 35 $\mu g/m^3$ in 2006. On January 9, 2013, U.S. EPA issued a final rule to determine that the Air District attains the 24-hour $PM_{2.5}$ national standard. This U.S. EPA rule suspends key SIP requirements as long as monitoring data continues to show that the Air District attains the standard. Despite the U.S. EPA action, the Air District will continue to de designated as a non-attainment for the national 24-hour $PM_{2.5}$ standard until the Air District submits a redesignation request and a maintenance plan to U.S. EPA, and U.S. EPA approves the proposed redesignation.
Source: BAAQMD 2017 Clean Air Plan https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en

It should be noted that on January 9, 2013, the U.S. EPA issued a final rule to determine that the Bay Area has attained the 24-hour $PM_{2.5}$ National AAQS (NAAQS). Nonetheless, the Bay Area must continue to be designated as nonattainment for the Federal $PM_{2.5}$ NAAQS until such time as the Bay Area Air Quality Management District (BAAQMD) submits a redesignation request and a maintenance plan to the U.S. EPA and the U.S. EPA approves the proposed redesignation.

4.3.1.3 *Local Community Risks/Toxic Air Contaminants and Fine Particulate Matter*

In addition to criteria air pollutants, there is another group of substances found in ambient air referred to as Toxic Air Contaminants (TACs). TACs tend to be localized and are found in relatively low concentrations; however, exposure to low concentrations of TACs over long periods can result in adverse chronic health effects. Diesel exhaust is a predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs (based on the Bay Area average).

Fine Particulate Matter ($PM_{2.5}$) is a complex mixture of substances that includes elements such as carbon and metals; compounds such as nitrates, organics, and sulfates; and complex mixtures such as diesel exhaust and wood smoke. Long-term and short-term exposure to $PM_{2.5}$ can cause a wide range of health effects. Common stationary sources of TACs and $PM_{2.5}$ include gasoline stations, dry cleaners, and diesel backup generators. The other, more significant, common source is motor vehicles on roadways and freeways.

4.3.1.4 *Sensitive Receptors*

The BAAQMD defines sensitive receptors as facilities where population groups that are particularly sensitive to the effects of air pollutants (i.e., children, the elderly, and people with illnesses) are likely to be located. Examples include schools, hospitals, and residential areas. The nearest sensitive receptors to 630 Laurelwood Road consist of homes in a residential area approximately 2,000 feet northwest of the project site. The billboard proposed for removal at 2983 El Camino Real is located approximately 300 feet to the south of single-family homes. The nearest sensitive receptors from the San Francisco billboard removal site are mixed-use and residences located approximately 20 feet to the north. The nearest sensitive receptors from the Oakland billboard removal site are residential homes located approximately 20 feet to the east.

4.3.1.5 *Applicable Plans, Policies, and Regulations*

Federal, State, and Regional

Federal, State, and regional agencies regulate air quality in the SFBAAB, within which the proposed project is located. The Federal Clean Air Act and the California Clean Air Act mandate the control and reduction of certain air pollutants. Under these Acts, the U.S. EPA and CARB have established ambient air quality standards for specific "criteria" pollutants. These pollutants are carbon monoxide (CO), ozone (O_3), sulfur dioxide (SO_2), nitrogen oxides (NO_X), particulate matter less than 10 microns in diameter (PM_{10}), lead, and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$).

The BAAQMD has permit authority over stationary sources, acts as the primary reviewing agency for environmental documents, and develops regulations that must be consistent with, or more stringent than, Federal and State air quality laws and regulations.

Regional Air Quality Management Districts such as the BAAQMD must prepare air quality plans specifying how State air quality standards would be met. The BAAQMD's most recently adopted plan is the *Bay Area 2017 Clean Air Plan* (2017 CAP).

4.3.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
AIR QUALITY. Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒	1, 2, 6, 7
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐	1, 2, 6
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐	1, 2, 6
d) Result in substantial emissions (such as odors or rust) adversely affecting a substantial number of people?	☐	☐	☐	☒	1, 2, 6

4.3.3 Air Quality Impacts

4.3.3.1 *Thresholds of Significance*

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the lead agency and must be based to the extent possible on scientific and factual data. The City of San José, and other jurisdictions in the SFBAAB, often utilizes the thresholds and methodology for assessing air emissions and/or health effects adopted by the BAAQMD based upon the scientific and other factual data prepared by the BAAQMD in developing those thresholds.

The determination of whether a project may have a significant effect on the environment is subject to the discretion of each lead agency, based upon substantial evidence. The City has carefully considered the thresholds prepared by the BAAQMD in June 2017 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin. Evidence supporting these thresholds has been presented in the following documents:

- BAAQMD. *CEQA Air Quality Guidelines.* Updated May 2017.
- BAAQMD. *Revised Draft Options and Justification Report California Environmental Quality Act Thresholds of Significance*. October 2009.
- California Air Pollution Control Officers Association. *Health Risk Assessments for Proposed Land Use Projects*. July 2009.
- California Environmental Protection Agency, California Air Resources Board. *Air Quality and Land Use Handbook: A Community Health Perspective.* 2005.

The analysis in this Initial Study is based upon the general methodologies in the most recent BAAQMD *CEQA Air Quality Guidelines* (dated May 2017) and numeric thresholds identified for the SFBAAB in the May 2017 BAAQMD *CEQA Air Quality Guidelines*, as shown in **Table 4.3-2**.

Table 4.3-2
Project-Level Significance Thresholds

Pollutant	Construction	Operation-Related	
	Average Daily Emissions (pounds/day)	**Average Daily Emissions** (pounds/day)	**Maximum Annual Emissions** (tons/year)
ROG, NO_X	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
Fugitive Dust (PM_{10}/$PM_{2.5}$)	Best Management Practices	None	None
Risk and Hazards for New Sources and Receptors (Project)	Same as Operational Threshold	• Increased cancer risk of >10.0 in one million • Increased non-cancer risk of >1.0 Hazard Index (chronic or acute) • Ambient $PM_{2.5}$ increase: > 0.3 μ/m^3 [Zone of influence: 1,000-foot radius from property line of source or receptor]	
Risk and Hazards for New Sources and Receptors (Cumulative)	Same as Operational Threshold	• Increased cancer risk of >100 in one million • Increased non-cancer risk of >10.0 Hazard Index (chronic or acute) • Ambient $PM_{2.5}$ increase: > 0.8 μ/m^3 [Zone of influence: 1,000-foot radius from property line of source or receptor]	
Note: μ/m^3 = micrograms per cubic meter.			

The BAAQMD *CEQA Air Quality Guidelines* (Air Quality Guidelines) recommend that projects be evaluated for community risk when they are located within 1,000 feet of freeways, high traffic volume roadways (10,000 average annual daily trips or more), and/or stationary permitted sources of toxic air contaminants (TACs). The project site is adjacent to US 101, an eight-lane freeway in the vicinity of the project site.

4.3.3.2 *Operational Air Quality Impacts*

Consistency with the Clean Air Plan

The 2017 CAP is the currently applicable Clean Air Plan for the SFBAAB. The 2017 CAP addresses air quality impacts with respect to obtaining ambient air quality standards, reducing exposure of sensitive receptors to TACs, and reducing greenhouse gas emissions (GHGs). Since the proposed project does not involve population or employment growth, determining consistency with the 2017 CAP involves assessing whether applicable control measures contained in the 2017 CAP are implemented. The control measures are organized into nine categories: Stationary Sources, Transportation, Energy, Buildings, Agriculture, Natural and Working Lands, Waste Management, Water, and Super-GHG Pollutants. The control measures are geared towards traditional land uses (e.g., residential, commercial, industrial uses) and buildings. The 2017 CAP control measures are not applicable to signs. The proposed project would not, therefore, obstruct implementation of the 2017 CAP. **(No Impact)**

Regional and Local Air Quality Impacts

Most of a typical project's operational air pollutant emissions are generated from vehicles traveling to and from a site. The operation of the proposed sign would include vehicle trips with minimal and irregular maintenance activities, occurring only as needed (less than once per month and likely only one vehicle).

The BAAQMD has also developed screening criteria whereby an agency can quickly determine whether a given development project has the potential to exceed adopted pollution thresholds. If all of the screening criteria are met by a proposed project, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. Although the screening criteria do not include a category for billboards, a comparison to the land uses in that screening table can be used to inform the operational analysis. For instance, the BAAQMD has determined that, to violate operational emissions criteria, a use more intense than a 451-unit apartment building would have to be constructed. At the operational phase, the proposed project consists of a new digital billboard which, as identified above, would require minimal and irregular maintenance activities that would occur only as needed (less than once per month and likely only one vehicle). Operation of the of billboard would entail significantly less activity than operation of a 451-unit apartment building.

The direct air pollutant emissions associated with vehicle trips from operation of the proposed sign would result in air pollution emissions below the criteria air pollutant significance thresholds for an individual project identified by the BAAQMD. **(Less Than Significant Impact)**

4.3.3.3 *Construction-Related Quality Impacts*

Installation of the LED digital billboard would require minor excavation for construction of the billboard foundation which would take approximately five to seven days. Removal of the two existing billboard facings would require minimal construction and would take approximately two to four days.

Construction-related pollution is not anticipated to be significant. For example, the BAAQMD has determined that in formulating screening criteria that construction projects of 240 apartment units or less do not require in-depth air quality review, and the minimal sign construction and removal activities associated with the project, lasting a maximum of two weeks, are much less intense than a 240-unit apartment project. Furthermore, with respect to the site of the proposed new digital display, the nearest sensitive receptors are located 2,000 feet away, which is outside the BAAQMD's 1,000-foot zone of influence.

Wind blowing over exposed earth during foundation construction and removal of existing billboard structures would emit dust and exhaust that would temporarily affect local and regional air quality. Construction activities are also a source of organic gas emissions. Although the project requires only minimum construction activities and construction is unlikely to result in exceedance of $PM_{2.5}$ and PM_{10} exhaust and fugitive dust thresholds, it is conservatively determined that construction dust could temporarily affect local air quality in the project area which is less than half a mile from sensitive receptors.

Impact AIR-1 Foundation construction and billboard removal activities could expose sensitive receptors to short-term air quality impacts associated with dust and exhaust generation. **(Significant Impact)**

Mitigation Measure: The following mitigation measure shall be implemented by the project to minimize dust during construction:

MM AIR-1.1 The BAAQMD has prepared a list of feasible construction dust control measures that can reduce construction impacts to a level that is less than significant. The following construction practices applicable to the project shall be implemented during construction of the proposed project:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible after grading to minimize dirt and soil exposure. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as

required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Health risks from TACs are a function of both concentration and duration of exposure. Typically, if heavy equipment use is less than six months, then the associated health risk is considered less than significant. Removal of two billboard facings and construction of one digital LED billboard would take no more than two weeks all together, and would not entail construction diesel engines operating for any significant amount of time. For example, hand tools and small crane rigs would be used to remove the billboard faces. Meanwhile, the majority of the construction work at the proposed sign location is located about 2,000 feet from the closest receptor, which is well outside the BAAQMD's zone of influence for health risk impacts. With implementation of the identified mitigation measure above, construction activities associated with the project would be minimal and would not result in the exposure for sensitive receptors to significant amounts of TACs during construction. **(Less Than Significant Impact with Mitigation)**

4.3.3.4 *Odors*

The project would not be a source of odor. **(No Impact)**

4.3.4 Conclusion

The project would reduce the number of billboards in the City and would, therefore, also reduce the number of vehicle trips required to upkeep and maintenance the billboards in the City. The project would not violate an air quality plan, violate any air quality standards, or result in a cumulatively considerable net increase of any criteria pollutant. **(Less Than Significant Impact)**

Implementation of the above-described mitigation measure would further reduce short-term construction-related air quality impacts. The project would not expose sensitive receptors to substantial pollutant concentrations. **(Less Than Significant Impact with Mitigation)**

4.4 BIOLOGICAL RESOURCES

4.4.1 Setting

The proposed billboard site on Laurelwood Road and the billboard removal sites are located in developed urban habitat in the City of Santa Clara. There are no waterways, wetlands, or other sensitive habitats located adjacent to 630 Laurelwood Road or to any of the billboard removal sites. The nearest waterways are the Guadalupe River located approximately 0.5 mile east of the project site and San Tomas Aquino Creek located approximately 1.25 miles west of the site. The proposed billboard site and billboard removal sites are surrounded by industrial, commercial, or residential development, which is mostly covered with pavement and buildings.

Vegetation in the vicinity of the proposed billboard site and the billboard removal sites consists of urban landscaping, including turfgrass, shrubs, and trees along building frontages. Habitats in developed areas of Santa Clara, such as the project site, are extremely low in species diversity and include predominantly adapted birds and animals such as house sparrow, mourning dove, fox squirrel, and domestic cats.

Rare, threatened, and endangered sensitive plants, animals and natural communities are not expected or likely to occur on the proposed billboard site or on any of the billboard removal sites. This conclusion is based upon the fact that the sites do not contain suitable habitat (e.g., salt marsh, wetland, riparian or serpentine soils) for any of these species.

4.4.1.1 *Conservation Plans*

The project site is not located within an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP) or other approved local, regional, or State habitat conservation plan.

4.4.1.2 *Trees on the Project Site*

There are several landscape trees adjacent the southern edge of project site along US 101. There are no Heritage Trees on or adjacent to the project area.[11] No trees are proposed for removal as part of the proposed project.

[11] City of Santa Clara. *City of Santa Clara 2010-2035 General Plan*. Appendix 8.10 Heritage Tree Inventory.

4.4.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
BIOLOGICAL RESOURCES. Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	1, 2
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	1, 2
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal filling, hydrological interruption, or other means?	☐	☐	☐	☒	1, 2
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐	1, 2
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒	1, 2, 8
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒	1, 2

4.4.3 Biological Resources Impacts

4.4.3.1 *Special-Status Species and Sensitive Habitats*

Natural or sensitive habitats are not present at either the proposed billboard location or the two billboard removal sites. All sites are in urban locations, and the site of the proposed new sign consists of a parking lot with a dirt/gravel apron. As a result, no impacts to natural plant communities, sensitive habitats, or habitats used by special status species would occur as a result of the proposed project. **(No Impact)**

4.4.3.2 *Trees*

Tree removal would not be required to install the proposed billboard at 630 Laurelwood Road. Mature landscaping trees are present and directly adjacent to the proposed project site, between the proposed billboard location and US 101. The proposed project construction would not impact existing trees and would retain all trees on site.

Mature landscaping trees are present and directly adjacent to the billboard proposed for removal at 2629 San Bruno Avenue or 4580 MacArthur Boulevard and at 2983 El Camino Real. Billboard removal would not impact existing trees and would retain all trees on site.

Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, including trees. **(No Impact)**

4.4.3.3 *Potential Impacts to Nesting Birds*

The mature landscaping trees near the project site at 630 Laurelwood and billboards proposed for removal at 2983 El Camino Real and 2629 San Bruno Avenue or 4580 MacArthur Boulevard provide potential nesting habitat for tree-nesting migratory birds that utilize urban settings. Migratory birds are protected under the Migratory Bird Treaty Act and the California Fish and Game Code Sections 3503, 3503.5, and 2800. Migratory birds utilize mature trees for nesting and foraging habitat. Although in a highly urban setting, the proposed project may result in loss of fertile eggs or nestlings, or lead to nest abandonment. The California Department of Fish and Wildlife (CDFW) defines "taking" as causing abandonment and/or loss of reproductive efforts through disturbance.

Impact BIO-1: Although unlikely at this location, construction or demolition activities associated with the proposed project at 630 Laurelwood, 2983 El Camino Real, 2629 San Bruno Avenue, or 4580 MacArthur Boulevard could result in the loss of fertile eggs of nesting migratory birds, or nest abandonment. **(Significant Impact)**

Mitigation Measures: The following mitigation measures shall be implemented by the project to avoid abandonment of protected migratory bird nests:

MM BIO-1.1: Construction and demolition activities shall be scheduled to avoid the nesting season to the extent feasible. The nesting season for most birds, including most raptors in the San Francisco Bay area, extends from February 1 through August 31.

MM BIO-1.2: If it is not possible to schedule demolition between September and January, pre-construction surveys for nesting birds shall be completed by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. This survey shall be completed no more than 14 days prior to the initiation of construction activities during the early part of the breeding season (February 1 through April 30) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May 1 through August 31). During this survey, the

ornithologist will inspect all trees and other possible nesting habitats immediately adjacent to the construction areas for nests. If an active nest is found sufficiently close to work areas to be disturbed by construction, the ornithologist, in consultation with CDFW, will determine the extent of a construction-free buffer zone to be established around the nest to ensure that migratory bird nests will not be disturbed during project construction.

With implementation of the identified measures above, the project would result in a less than significant impact on migratory birds. **(Less Than Significant Impact with Mitigation)**

4.4.4 Conclusion

The proposed project site and billboard facings removal sites are located in developed urban habitats. With implementation of the identified mitigation measures, the project would result in a less than significant impact on biological resources. **(Less Than Significant Impact with Mitigation)**

4.5 CULTURAL RESOURCES

4.5.1 Setting

4.5.1.1 *Buried Archaeological Resources*

Archaeological deposits are typically found near creeks and other waterways. Archaeological resources found in Santa Clara also include the Santa Clara Mission, Native American burial grounds, and the Berryessa Adobe area.

There are no water sources located adjacent to the 630 Laurelwood Road project site. The nearest waterways are the Guadalupe River located approximately 0.5 mile east of the project site and San Tomas Aquino Creek located approximately 1.25 miles west of the site. None of the billboard removal sites are located within 500 feet of a creek or waterway.

4.5.1.2 *Architecturally or Historically Significant Structures*

There are no designated architecturally or historically significant resources located on or adjacent to the proposed billboard site or the two billboard facings removal sites.[12]

[12] City of Santa Clara. *City of Santa Clara 2010-2035 General Plan*. Appendix 8.9 Historic Preservation and Resource Inventory.

4.5.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
CULTURAL RESOURCES. Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?	☐	☐	☐	☒	1, 2
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	☐	☒	☐	☐	1, 2
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐	1, 2

4.5.3 Cultural Resources Impacts

4.5.3.1 *Proposed Billboard Removals*

The two existing billboard facings proposed for removal would have their facings removed from the above-grade portion of the billboard structures. In the event that historic or prehistoric cultural resources are present in the ground beneath the existing billboards, the below-surface archaeological resources would not be disturbed as part of the project. **(No Impact)**

4.5.3.2 *Proposed LED Digital Billboard*

Construction of the billboard structure at 630 Laurelwood Road would require boring a hole for the foundation of the billboard. The foundation would have a diameter of approximately five (5) feet and would extend to a depth of approximately 57 feet below the ground surface. The site is currently paved and has been developed for industrial uses.

Per information in the City's General Plan, the Laurelwood Road site is not located in an area of the City with known archaeological resources or within 500 feet of a creek or waterway. Based on the absence of recorded buried cultural resources in the surrounding area, the historically disturbed nature of the proposed billboard site, and the limited area of excavation, the likelihood to encounter archaeological resources during construction of the billboard foundation is minimal.

Impact CUL-1: Although unlikely, cultural resources could be uncovered during construction of the foundation for the proposed project. **(Significant Impact)**

Mitigation Measure: The following mitigation measure shall be implemented by the project to reduce impacts to cultural resources to less than a significant level:

MM CUL-1.1: If historic/prehistoric artifacts or human remains are discovered during ground disturbing activities, the following measures will be implemented:

- In compliance with State law (Section 7050.5 of the Health and Safety Code and Section 5097.94 of the Public Resources Code), in the event that historical artifacts are found, all work within 50 feet of the find will stop and a qualified professional archaeologist will examine the find. If the find is determined to be significant, treatment recommendations will be developed and implemented before earthmoving or construction activities can recommence within the designated resource area.
- In compliance with State law (Section 7050.5 of the Health and Safety Code and Section 5097.94 of the Public Resources Code), in the event that human remains are encountered during grading and construction, all work within 50 feet of the find will stop and the Santa Clara County Coroner's office will be notified. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission to identify the "Most Likely Descendant" (MLD). The City, in consultation with the MLD, will then develop and implement a plan for treatment, study and reinterment of the remains. **(Less Than Significant Impact with Mitigation)**

4.5.4 Conclusion

There are no known historic or archaeological resources in the vicinity of the project sites that would be affected by the project. With implementation of the mitigation measure described above, the proposed project would not result in significant impacts to cultural resources. **(Less Than Significant Impact with Mitigation)**

4.6 ENERGY

4.6.1 Setting

The proposed billboard site on Laurelwood Road and the billboard removal sites are located in developed areas in the City of Santa Clara and San Francisco or Oakland. Power is provided through Silicon Valley Power (SVP), a municipal electric utility department of the City. The Santa Clara 2010-2035 General Plan includes policies that address sustainability goals related to efficient use of energy and alternative power. Electricity is provided from various sources, including natural gas, wind and hydroelectric generation resources in California and other western states. SVP electricity supplies have been coal-free since 2018. In 2018, more than 44% percent of the electricity provided by SVP was from carbon-free renewable resources.[13]

Digital billboards are comprised of LEDs, power supplies, cooling systems, lighting controls, and a computer. LEDs represent the largest portion of the billboard's energy consumption, particularly during peak demand times when ambient lighting from sunlight is the brightest.[14] The annual

[13] Silicon Valley Power. *Strategic Plan 2018.* 2018 https://www.siliconvalleypower.com/home/showpublisheddocument/62267/636795933245570000.
[14] Energy Solutions. *Digital Billboard Energy Use in California*. 2014. https://www.etcc-ca.com/sites/default/files/reports/et14sdg8011_digitalbillboardreport_2014-7.pdf.

electricity use is projected to be 26,400 kilowatt-hour (kWh), or a daily average of approximately 72 kWh.

The maximum ambient light output level of 0.3-foot candles at 250 feet, as recommended by the OAAA, would operate at one-sixth of the maximum brightness level for LED billboards, as set forth by California state law, and would result in additional efficient energy consumption. LED digital billboards (programmable electronic signs) are subject to energy efficiency requirements under Title 24 of the California Code of Regulations and the proposed project would meet the energy efficiency requirements.

4.6.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
ENERGY. Would the project:					
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources, during project construction or operation?	☐	☐	☒	☐	1
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐	1, 2

4.6.3 Energy Impacts

4.6.3.1 *Proposed Billboard Removals*

Removal of the two existing billboard facings would not generate a significant demand for energy. Energy usage for removal stems from materials, waste, and transportation. The removal of two billboard facings would generate some waste materials that would be reused by the project applicant or delivered to a recycling facility and/or disposed of at landfills that accept demolition waste from contractors in compliance with Federal, State, and local regulations. **(Less Than Significant Impact)**

4.6.3.2 *Proposed LED Digital Billboard*

During construction, the proposed project would result in energy consumption through the combustion of fossil fuels in construction vehicles, worker commute vehicles, and construction equipment, and the use of electricity for temporary buildings, lighting, and other sources. No natural gas would be utilized as part of construction. Fossil fuels used for construction vehicles and other energy-consuming equipment would be used during demolition, grading, paving, and building construction activities. The types of equipment could include gasoline- and diesel-powered construction and transportation equipment, including trucks, bulldozers, frontend loaders, forklifts, and cranes. Other equipment could include electrically driven equipment such as pumps and other tools.

Based on the applicant's experience in the construction of similar projects, construction-related worker vehicle trips would consume no more than 201 gallons of diesel and gasoline, combined, and construction-related equipment would consume no more than 1,342 gallons of diesel and gasoline, combined, during project construction.

Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California Code of Regulations Title 13, Sections 2449(d)(3) and 2485 limit idling from both on-road and off-road diesel-powered equipment and are enforced by the CARB. In addition, given the cost of fuel, contractors, and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction.

Because of the temporary nature of construction and the financial incentives for developers and contractors to implement energy-efficient practices, project construction activities would not result in wasteful, inefficient, and unnecessary consumption of energy. Therefore, the construction-related impact related to fuel and electricity consumption would be less than significant.

The proposed billboard would connect to existing electrical lines that serve existing development at the site. The project would be subject to all applicable Federal, State, and local building regulations sources. Title 24 of the California Code of Regulations limits energy use for exterior signage in California. Energy efficiency requirements in the California Energy Code (Title 24) as well as dimming requirements for programmable (LED) billboards in the Outdoor Advertising Act would limit the energy demand for the display face and new off-site electrical infrastructure is not needed to serve the project site. Moreover, the electronic billboard would not consume natural gas and would rely upon renewable energy sources consistent with California law. For instance, consistent with SB 100 (2018), Silicon Valley Power, the City's electric utility, has committed to only procuring new energy sources that are 50% renewable by 2026, 60% renewable by 2030, and greenhouse gas free by 2045. The proposed project would receive electricity from SVP, which is achieving the State requirements for greenhouse gas reductions.

The installation of a billboard at 630 Laurelwood Road would not exceed the capacity of existing power utility systems or require the construction of new facilities, the result of which could have adverse environmental effects. **(Less Than Significant Impact)**

4.6.4 Conclusion

The project would not encourage activities that use large amounts of energy or use energy resources in a wasteful manner, and would be constructed pursuant to current electrical codes subject to review by the City of Santa Clara. **(Less Than Significant Impact)**

4.7 GEOLOGY AND SOILS

4.7.1 Setting

4.7.1.1 *Geology and Soils*

The project area is located in the Santa Clara Valley, a relatively flat alluvial basin, bounded by the Santa Cruz Mountains to the southwest and west, the Diablo Mountain Range to the east, and the San Francisco Bay to the north. The soil is made up of bedrock overlaid with marine and terrestrial sedimentary rocks of Tertiary and Quaternary age materials.

There are no unique geologic features on or adjacent to the project site. Due to the flat topography of the project sites, the potential for erosion or landslide on or adjacent to any of the sites is low.

4.7.1.2 *Seismicity*

The project area is located within the seismically active San Francisco Bay Area. The significant earthquakes that occur in the Bay Area are generally associated with crustal movement along one of the three well-defined, active fault zones. The three major faults in the region are the San Andreas Fault, the Calaveras Fault, and the Hayward Fault which are located approximately 11 miles west, 10 miles east, and six miles north of the of the project area, respectively. The project sites are not located within a fault rupture zone.[15] [16] Faults in the region are, however, capable of generating earthquakes of magnitude 7.0 or higher and strong to very strong ground shaking would be expected to occur at the project site during a major earthquake on one of the nearby faults. The site is not located within an Alquist-Priolo Earthquake Fault Zone.[17]

To evaluate ground shaking conditions for the proposed structure, soil characteristics were determined using US Geological Survey soil classifications. The soils on the Laurelwood Road property are Site Soil Classification D – "Stiff Soils."

4.7.1.3 *Regulatory Setting*

Local and State Design Regulations

Section 18.80.090 of the City's Sign Code requires that signs and sign structures be designed and constructed to resist wind and seismic forces as specified in the latest edition of the Uniform Building Code as adopted by the City. All bracing systems shall be designed and constructed to transfer lateral forces to the foundations.

[15] Santa Clara County, *Santa Clara County Geologic Hazard Zones: Fault Rupture Hazard Zones, Map 11*. https://www.sccgov.org/sites/dpd/DocsForms/Documents/GEO_GeohazardATLAS.pdf. Accessed May 4, 2021
[16] California Department of Conservation, *California Earthquake Hazards Zone Application ("EQ Zapp")*. https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed May 4, 2021.
[17] Terracon, *Geotechnical Engineering Report for Terracon Project No. ND205064* (Sept. 23, 2020).

4.7.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
GEOLOGY AND SOILS. Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒	1, 2, 9
ii) Strong seismic ground shaking?	☐	☐	☒	☐	1, 2, 9
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	1, 2, 9
iv) Landslides?	☐	☐	☐	☒	1, 2, 9
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐	1, 2, 9
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐	1, 2, 9
d) Be located on expansive soil, as defined in Section 1803.5.3 of the California Building Code (2019), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐	1, 2, 9
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒	1
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒	1, 2

4.7.3 Geological Impacts

4.7.3.1 *Proposed Billboard Removals*

The two existing billboard facings proposed for removal would have their facings removed from the structure and have their poles cut at the ground. Only the above-ground portion of the billboard

structures would be removed, with below surface foundations remaining. Billboard facings removal would not result in new geology, soils, or seismicity hazards. **(No Impact)**

4.7.3.2 *Proposed LED Digital Billboard*

The project site is not located in an Alquist-Priolo Earthquake Fault Zone. According to the City's General Plan, the risk of surface fault rupture is considered low.[18] Because the project site is located within a seismically active region, strong shaking would be expected during the lifetime of the proposed project, which could damage future improvements to the site and expose people to injury. To ensure the billboard is constructed safely and to avoid or minimize potential damage from seismic shaking, construction and design would be undertaken using standard engineering and seismic safety design techniques in accordance with the 2019 California Building Code (CBC). Therefore, the impact related to potential rupture of a known earthquake fault and seismic ground shaking would be less than significant. (**Less Than Significant Impact)**

The City is located almost entirely within a liquefaction zone.[19] The project site is located in an area designated by the United States Geological Survey as having moderate susceptibility to liquefaction.[20] A liquefaction hazard evaluation was prepared by Terracon to determine the potential for liquefaction induced settlement. The cohesive soils at the site behave more "clay-like" and have a low potential for cyclic softening/liquefaction. Due to the cohesive nature and thickness of non-liquefiable soils across the surface of the site, the probability for liquefaction to manifest at the surface is low. The site is an urban environment with substantial development having occurred on the site itself and adjacent parcels. Additionally, the project would not construct structures intended for human occupancy. With adherence to the 2019 CBC, impacts related to seismic-related ground failure, including liquefaction, would be less than significant. (**Less Than Significant Impact**)

The project site and surrounding areas are flat, basin areas and there are no waterways in the vicinity of the project area. The project would not, therefore, be exposed to landslide related hazards and erosion hazards are relatively low. (**Less Than Significant Impact**)

Construction of the proposed project would not result in substantial soil erosion or loss of topsoil. The project's earth disturbing activities consist of drilling a hole (5 feet in diameter and approximately 57 feet deep) for the foundation of the proposed billboard. (**Less Than Significant Impact**)

Soils on the project site are characterized as medium stiff to stiff fat clay. While there is a potential for clay soils to be expansive, with adherence to the 2019 CBC, which includes standards to address expansive soils conditions, impacts associated with expansive soils would be less than significant. (**Less Than Significant Impact**)

[18] City of Santa Clara, *City of Santa Clara General Plan 2010-2035.* 2010.
[19] City of Santa Clara, *City of Santa Clara General Plan 2010-2035.* 2010.
[20] Terracon, *Geotechnical Engineering Report for Terracon Project No. ND205064* (Sept. 23, 2020).

With respect to the potential for lateral spreading, the site and surrounding area is relatively level. Given the relative flatness of the local topography and distance to any open faces, the potential for lateral spreading to affect the project site is low.[21] (**Less Than Significant Impact**)

The proposed billboard has been designed and will be constructed in accordance with standard engineering safety techniques and in conformance with the 2019 CBC, which contains the regulations that govern the construction of structures in California. Adherence to the 2019 CBC will ensure the proposed billboard structure will avoid hazards related to soil conditions on the site and will resist minor earthquakes without damage, and major earthquakes without collapse. **(Less Than Significant Impact)**

Per information in the City's General Plan, the Laurelwood Road site is not located in an area of the City with known archaeological resources or within 500 feet of a creek or waterway. Based on the historically disturbed nature of the proposed billboard site, and the limited area of excavation, the likelihood to encounter paleontological resources during construction of the billboard foundation is minimal. (**Less Than Significant Impact**)

4.7.4 Conclusion

Construction of the proposed billboard in conformance with the 2019 CBC will minimize and avoid significant impacts associated with geologic or seismic conditions. **(Less Than Significant Impact)**

4.8 GREENHOUSE GAS EMISSIONS

4.8.1 Setting

4.8.1.1 *Background Information*

Unlike emissions of criteria and toxic air pollutants, which have local or regional impacts, emissions of Greenhouse Gases (GHGs) have a broader, global impact. Global warming associated with the "greenhouse effect" is a process whereby GHGs accumulating in the atmosphere contribute to an increase in the temperature of the earth's atmosphere. The principal GHGs contributing to global warming and associated climate change are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds. Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, utility, residential, commercial, and agricultural sectors.

4.8.1.2 *Existing Conditions*

Proposed Billboard Removals

GHG emissions are generated by electricity usage for nighttime illumination and limited trips to and from the two existing billboard sites for maintenance and manual installation of new billboard messages.

[21] Terracon, *Geotechnical Engineering Report for Terracon Project No. ND205064* (Sept. 23, 2020).

Proposed LED Digital Billboard

The project site is current developed with a light industrial business (i.e., self-storage units). GHG emissions are generated by daily traffic trips of employees, clients, and for deliveries and water and electricity usage.

4.8.2 Regulatory Background

4.8.2.1 *State of California*

State of California Executive Order S-3-05 & Executive Order B-30-15

In June 2005, Governor Schwarzenegger issued Executive Order S-3-05, which identified CalEPA as the lead coordinating State agency for establishing GHG emission reduction targets in California. A "Climate Action Team," a multi-agency group was set up to implement Executive Order S-3-05. Under this order, the State plans to reduce GHG emissions to 80 percent below 1990 levels by 2050.

Subsequently, on April 29, 2015, Governor Edmund G. Brown Jr. issued Executive Order B-30-15, setting a new interim statewide greenhouse gas emission reduction target. The purpose of establishing the interim target is to ensure California meets its previously established target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050, as set forth in Executive Order S-3-05 in 2005. Under Executive Order B-30-15, the interim target is to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030. The California Air Resources Board is currently updating the Climate Change Scoping Plan (see below) to provide a framework for achieving this new 2030 target. Executive Order B-30-15 also calls for the California Natural Resources Agency to update the State of California's climate adaption strategy, Safeguarding California, every three years and be responsible for ensuring that the provisions in the State's climate adaption strategy are fully implemented.

Assembly Bill (AB) 32 – The California Global Warming Solutions Act of 2006

California Assembly Bill (AB) 32, the California Global Warming Solutions Act, was signed into law in September 2006. With the passage of AB 32, the State of California made a commitment to reduce GHG emissions to 1990 levels by 2020, which represents about a 30 percent decrease over then-current levels (as of 2006). CARB's Discrete Early Actions include maximizing energy efficient building and appliance standards, pursuing additional efficiency efforts, including new technologies and new policy and implementation mechanisms, and pursuing comparable investment in energy efficiency by all retail providers of electricity in California (including both investor-owned and publicly-owned utilities). In December 2008, CARB approved the Climate Change Scoping Plan, which proposes a comprehensive set of actions designed to reduce California's dependence on oil, diversify energy sources, save energy, and enhance public health, among other goals.

In November 2017, CARB adopted an updated Scoping Plan document. The 2017 update further defines climate change priorities in California to meet 2030 greenhouse gas emissions by 2030 and builds upon efforts already underway to reduce greenhouse gases, criteria pollutants, and toxic

air contaminants in California.[22] The 2017 update highlights California's progress toward meeting the 2020 greenhouse gas emission reduction goals defined in the 2008 Scoping Plan and evaluate how to align the State's longer-term greenhouse gas reduction strategies with other State policy priorities such as for water, waste, natural resources, agriculture, clean energy, transportation, and land use.

4.8.2.2 *2017 Bay Area Clean Air Plan*

The 2017 CAP is a multi-pollutant plan that addresses GHG emissions along with other air emissions in the San Francisco Bay Area Air Basin. One of the key objectives in the 2017 CAP is climate protection. The 2017 CAP includes emission control measures in nine categories: Stationary Sources, Transportation, Energy, Buildings, Agriculture, Natural and Working Lands, Waste Management, Water, and Super-GHG Pollutants. Consistency of a project with current control measures is determined by its consistency with the 2017 CAP. The current 2017 CAP also includes performance objectives, consistent with the state's climate protection goals under AB 32 and SB 375, designed to reduce emissions of GHGs to 1990 levels by 2020 and 40 percent below 1990 levels by 2035.

4.8.2.3 *CEQA Air Quality Guidelines*

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. The City of Santa Clara and other jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing GHG impacts developed by the BAAQMD within the CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

4.8.2.4 *City of Santa Clara General Plan*

The Santa Clara 2010-2035 General Plan includes policies that address the reduction of GHG emissions during the planning horizon of the General Plan. Goals and policies that address sustainability (see Appendix 8.13: Sustainability Goals and Policies Matrix in the General Plan) are aimed at reducing the City's contribution to GHG emissions. The City's General Plan also includes a comprehensive GHG emissions reduction strategy.

Climate Action Plan

The City of Santa Clara has a comprehensive GHG emissions reduction strategy (Climate Action Plan or CAP) to achieve its fair share of statewide emissions reductions for the 2020 timeframe consistent with AB 32, the Global Warming Solutions Act. The CAP was adopted on December 3, 2013. The City of Santa Clara CAP specifies the strategies and measures to be taken for a number of focus areas (coal-free and large renewables, energy efficiency, water conservation, transportation and land use, waste reduction, etc.) citywide to achieve the overall emission

[22] California Air Resources Board. *2017 Scoping Plan Documents*. https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2017-scoping-plan-documents

reduction target, and includes an adaptive management process that can incorporate new technology and respond when goals are not being met.

A key reduction measure that is being undertaken by the City of Santa Clara under the CAP is in the *Coal-Free and Large Renewables* focus area. The City of Santa Clara operates Silicon Valley Power (SVP), a publicly owned utility that provides electricity for the community of Santa Clara, including the project site. Since nearly half (48 percent) of Santa Clara's GHG emissions result from electricity use, removing GHG-intensive sources of electricity generation (such as coal) is a major focus area in the CAP for achieving the City's GHG reduction goals. This measure is being undertaken by Silicon Valley Power.

CEQA clearance for all discretionary development proposals is required to address the consistency of individual projects with reduction measures in the CAP and goals and policies in the General Plan designed to reduce GHG emissions. Compliance with appropriate measures in the CAP would ensure an individual project's consistency with an adopted greenhouse gas reduction plan. However, the City's CAP was designed to achieve the State's 2020 target for GHG emissions levels. Because the project would be completed in the post-2020 timeframe, compliance with the CAP is not, by itself, determinative as to whether the project would have a significant impact on GHG emissions.

4.8.3 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
GREENHOUSE GAS EMISSIONS. Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐	1, 10
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐	1, 10, 11

4.8.4 Greenhouse Gas Emissions Impacts

Greenhouse gas emissions worldwide contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single land use project could generate sufficient GHG emissions on its own to noticeably change the global average temperature. The combination of GHG emissions from past, present, and future projects in Santa Clara, the entire state of California, and across the nation and around the world, contribute cumulatively to the phenomenon of global climate change and its associated environmental impacts.

Per the CEQA Guidelines Section 15064 (b), a Lead Agency may analyze and mitigate significant GHG emissions in a plan for the reduction of GHG emissions that has been adopted in a public process following environmental review. The City of Santa Clara adopted its CAP (a GHG

reduction strategy) in 2013 which is in conformance with its most recent General Plan Update. The City of Santa Clara is updating its current CAP to integrate new State requirements and to inventory GHG emissions. The City's projected emissions and the CAP are consistent with measures necessary to meet statewide 2020 goals established by AB 32 and addressed in the Climate Change Scoping Plan.

The BAAQMD adopted GHG emissions thresholds of significance to assist in the review of projects under CEQA. These thresholds were designed to establish the level at which BAAQMD has determined that GHG emissions would cause significant environmental impacts. The GHG emissions thresholds identified by BAAQMD are 1,100 metric tons (MT) of CO_2e per year or 4.6 MT CO_2e per service population per year.

CARB has completed a Scoping Plan to achieve SB 32 GHG reduction targets, which will be utilized by BAAQMD to establish the 2030 GHG threshold. The BAAQMD has yet to publish a quantified GHG threshold for 2030. An adjusted bright-line threshold of 660 MT CO_2e/year, which is 40 percent below the BAAQMD 2020 bright-line threshold of 1,100 MT CO_2e, is used in this Initial Study.

4.8.4.1 *Proposed Billboard and Removal of Existing Billboards*

Projects result in GHG emissions during construction and operation (e.g., mobile emissions, emissions from generation of electricity for operations, emissions of from the manufacturing and transport of building materials).

With regard to construction, estimates from previous sign construction projects have been estimated to generate 14.2 metric tons of carbon dioxide equivalent. This amount is de minimis compared to the analogous BAAQMD threshold of 660 MT CO_2e per year.

LED digital billboards (programmable electronic signs) are subject to energy efficiency requirements under Title 24 of the California Code of Regulations. The billboard is required to be dimmable, which would reduce energy use and GHG emissions associated with the generation of electricity. The annual electricity use is projected to be 26,400 kWh (26.4 MWh), or a daily average of approximately 72 kWh. Based upon the GHG emission factor for Silicon Valley Power, which is updated on an annual basis,[23] GHG emissions associated with operation of the billboard would be about three metric tons of CO_2 equivalents per year. This amount is also de minimis compared to the BAAQMD threshold of 660 MT CO_2e per year.

During operation, the billboard would generate infrequent and irregular vehicle trips with maintenance vehicles coming to repair the billboard, as needed, typically less than once per month. Since the billboard would not generate regular vehicle trips (like an office or commercial development), the emissions from sign construction and operation would be minimal.

Changes in greenhouse gas emissions from the proposed project would involve removal of two existing billboard facings (demolition emissions and reduced operational emissions), construction of a new LED digital billboard, and operation of the new billboard. The GHG emissions from operation are related to emissions from the generation of electricity to operate lighting.

[23] The baseline emission factor is listed as 271 pounds of CO_2e per MWh.

Conformance with Santa Clara Climate Action Plan

As described previously, the City's CAP identifies a series of GHG emissions reduction measures to be implemented by development projects that would allow the City to achieve its GHG reduction goals. The measures center around seven focus areas: coal-free and large renewables, energy efficiency, water conservation, waste reduction, off-road equipment, transportation and land use, and urban heat island effect. Of these seven focus areas, waste reduction is applicable to private, LED digital billboard projects during construction and demolition activities.

Per General Plan Policy 5.10.3-P5, the project would reduce energy consumption through sustainable construction practices such as salvaging and recycling discarded building materials (i.e., demolition materials from existing billboards) in order to reduce the amount of demolition and construction waste going to the landfill. The materials would be reused at other locations by the project applicant or delivered to a recycling facility and/or appropriate landfill. This project measure would help to minimize GHG emissions generated by wood waste associated with the project and/or recycling of metals to reduce emissions from use of virgin materials.

Conformance with State and Regional Plans and Regulations

As discussed in Section 4.8.2, *Regulatory Background*, the State of California has adopted a Climate Change Scoping Plan. Greenhouse gas emissions are also addressed in the adopted 2017 CAP and Plan Bay Area.

The CARB-approved Climate Change Scoping Plan outlines a comprehensive set of actions intended to reduce overall greenhouse gas emissions in California, improve the environment, reduce dependence on oil, diversify California's energy sources, save energy, create new jobs, and enhance public health. The Scoping Plan includes recommended actions for reducing greenhouse gas emissions. While the Scoping Plan focuses on measures and regulations at a statewide level, local governments play a key role in implementing many of the strategies contained in the Scoping Plan, such as energy efficient building codes, local renewable energy generation, and recycling programs.

Similarly, the 2017 CAP includes performance objectives, consistent with the state's climate protection goals under AB 32 and SB 375, designed to reduce emissions of greenhouse gases to 1990 levels by 2020 and 40 percent below 1990 levels by 2035. The 2017 CAP identifies a range of Transportation Control Measures, Land Use and Local Impacts Measures, and Energy and Climate Measures that make up the CAP's control strategy for emissions, including greenhouse gas emissions.

As stated above, the construction and operation of the proposed project would not exceed the BAAQMD threshold of 660 MT CO_2e per year. In addition, given that demolition and construction materials would be salvaged or recycled in conformance with City of Santa Clara requirements, the project would meet Title 24 standards to reduce energy usage, and the project includes removal of two conventionally lit billboards, construction and operation of the project would not contribute substantially to local or regional GHG emissions that have a cumulative significant effect on the global environment. **(Less Than Significant Impact)**

4.8.5 Conclusion

The project would not impede local, regional, or statewide efforts to reduce gas emissions compared to 1990 levels. **(Less Than Significant Cumulative Impact)**

4.9 HAZARDS AND HAZARDOUS MATERIALS

4.9.1 Setting

Hazardous materials encompass a wide range of substances, some of which are naturally-occurring and some of which are man-made. Examples include pesticides, herbicides, petroleum products, metals, (e.g., lead, mercury, arsenic), asbestos, and chemical compounds used in manufacturing. Determining if such substances are present on or near project sites is important because, by definition, exposure to hazardous materials above regulatory thresholds can result in adverse health effects on humans, as well as harm to plant and wildlife ecology.

Hazardous materials may be present in surface and subsurface soils and groundwater as a result of current or former land uses. Land uses associated with hazardous materials include or have included agricultural activities, automobile and truck rental, service, and repair, electronics and other manufacturing operations, gasoline stations, and pest control services.

Other hazards in the built environment addressed in this section are related to airports, emergency response planning, and proximity to wildlands with a high potential for wildfires. The 630 Laurelwood Road property is located approximately 0.3 miles northwest of Norman Y. Mineta San José International Airport (San José International Airport) within the Airport Influence Area (AIA) as identified by the Santa Clara County Airport Land Use Commission (ALUC).

4.9.1.1 *On-Site Sources of Contamination*

Agricultural Use

Large areas of land in the City of Santa Clara were formerly used for agricultural purposes. Pesticides were applied to crops in the normal course of farming operations. Like much of Santa Clara, it appears that the 630 Laurelwood Road was used for agricultural purposes prior to current industrial or commercial land uses and it is likely that agricultural chemicals such as pesticides (including organochlorine pesticides, such as DDT, and pesticides containing metals [arsenic, lead and mercury]), herbicides, and fertilizers, were used. As a result, residual agricultural chemicals have the potential to be present in the native soils in the project area.

The 630 Laurelwood Road site is located on the north side of US 101 in an industrial and office area. Soils on the site were tested for volatile organic compounds by Pace Analytical (**Appendix A**) in August 2020 and none were detected.

Lead-Based Paint

The two billboard structures proposed for removal may have been constructed prior to 1978 at which time lead was banned as an additive in paint. Therefore, the billboard structures proposed for removal could have been treated with lead-based paint.

Reported Contamination

Based upon search of online databases, including the Cortese List on GeoTracker and EnviroStor, the proposed billboard site and proposed billboard removal sites are not located on properties included on a list of hazardous materials sites compiled pursuant to Government Code Section 56962.5 (i.e., the Cortese List).

None of the project sites are located within one-quarter mile of an existing or proposed school.

4.9.1.2 *Off-Site Sources of Contamination*

Reported Contamination

Based upon search of online databases, including the Cortese List on GeoTracker and EnviroStor, in May 2021, there are reported sources of contamination near the proposed billboard site (**Table 4.9-1**). The closest properties have received regulatory case closure.

Table 4.9-1:
Properties within 1,000 feet of 630 Laurelwood Road with Known Hazardous Materials Releases

Case Number	Address	Known Hazardous Materials Released	Status
SL0608554965	Pacific Production Consulting 600 Laurelwood Road	Tetrachloroethylene (PCE), Waste oil/ Motor/ Hydraulic/ Lubricating	Case closed in 2020
T0608500554	Roman Tire 800 Laurelwood Road	Gasoline	Case closed in 1995
T0608500978	STech Tech 605 Laurelwood Road	Gasoline	Case closed in 1997

Source: GeoTracker database, May 2021.

4.9.1.3 *Airport Safety Hazards Context and Regulatory Setting*

The Norman Y. Mineta San Jose International Airport is located about 0.3 miles southeast of the 630 Laurelwood Road site. Development within the Airport influence Area (AIA) can be subject to hazards from aircraft and also pose hazards to aircraft travelling to and from the airport. The AIA is a composite of areas surrounding the airport that are affected by noise, height, and safety considerations. These hazards are addressed in Federal and State regulations as well as in land use regulations and policies in the Airport Comprehensive Land Use Plan (CLUP).

CLUP Policy G-6 states that *'any proposed uses that may cause a hazard to aircraft in flight are not permitted within the AIA. Such uses include electrical interference, high intensity lighting, attraction of birds (certain agricultural uses, sanitary landfills), and activities that may produce smoke, dust, or glare.'* As discussed in Section 4.9.3.2 below, the FAA does not have standards or thresholds for sign brightness or glare. Nor does the Illumination Engineering Society (IES), who is recognized as the lighting authority and creates recommendations for proper illumination techniques.

4.9.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒	1
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐	1, 12, 13, 14
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒	1
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment	☐	☐	☐	☒	1, 12
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐	1, 15
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒	1
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒	1, 2

4.9.3 Hazardous Materials Impacts

4.9.3.1 *On-Site Hazards*

Potential Impacts of On-Site Contamination

Proposed Billboard Removals

For the two billboards that would be removed as part of the project, only the above-ground portion of the existing billboard structures would be removed and the below surface foundations would

remain. Disposal of the billboard facings would comply with local and state regulations. If the billboard structures were constructed prior to 1978, they could contain lead-based paint and/or other hazardous building materials.

Impact HAZ-1: Removal of existing billboards may pose a risk to construction workers if materials are not handled and disposed of properly. **(Significant Impact)**

Mitigation Measure: In conformance with existing safety regulations, the following mitigation measure would reduce significant impacts related to hazardous building materials to a less than significant level.

MM HAZ-1.1: The following measures shall be implemented during billboard removal activities to reduce potential impacts to construction workers associated with lead-based paint or other hazardous building materials (e.g., Universal Wastes):

In conformance with State and local laws, a visual inspection and possible sampling shall be completed prior to the removal of the billboard structures to determine the presence of lead-based paint or other hazardous building materials.

- During billboard removal activities, all materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR 1532.1, including employee training, employee air monitoring, and dust control.
- Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the waste being disposed. **(Less Than Significant Impact with Mitigation)**

Proposed LED Digital Billboard

Disturbance of on-site soils will be limited to removal of approximately 45 cubic yards of soil to install a foundation for the billboard. The foundation would be approximately five feet in diameter and 57 feet deep.

Although no volatile organic compounds were detected on-site (**Appendix A**), several contaminated sites (closed fuel leak cases) were identified within 1,000 feet of the project site. Although unlikely, petroleum hydrocarbons, fuel additives, and/or elevated concentrations of metals associated with industrial uses could be encountered where the foundation is drilled below the existing pavement on the site.

Impact HAZ-2: Hazardous materials associated with industrial uses may be present in soils on the site at levels that exceed regulatory thresholds. Construction activities associated with the proposed billboard could expose construction workers or the environment to contaminated soils or groundwater if contaminated soil and groundwater encountered under the site are not handled properly. **(Significant Impact)**

Mitigation Measure: The following mitigation measure would reduce significant impacts at the site to a less than significant level.

MM HAZ-2.1: If evidence of historic release of hazardous materials is discovered, work will be stopped in the immediate area and soil samples will be collected and analyzed by a qualified environmental professional to determine the type and extent of release and potential health effects to construction workers. The analytical results will be compared against applicable hazardous waste criteria and environmental screening levels (ESLs), and if necessary, the investigation will provide recommendations regarding management and disposal of affected soil and groundwater. Any contaminated soil and/or groundwater found in concentrations above developed thresholds shall be removed and disposed of according to California Hazardous Waste Regulations. Special health and safety measures and/or soil management procedures may also be required during project construction. **(Less Than Significant Impact with Mitigation)**

4.9.3.2 *Airport and Aircraft Hazards*

There are no private airstrips in the vicinity of the project sites. Installation of a new LED digital billboard at 630 Laurelwood or proposed removal of the two billboards would not result in a safety hazard to people residing or working in the area due to the sign in proximity to a private airstrip. **(No Impact)**

Airport Airspace Obstructions

Federal regulations require the proposed sign structure to be submitted to the FAA for airspace safety review. The FAA has reviewed the project and made a determination of No Hazard (**Appendix B**). FAA issuance of a Determination of No Hazard, and incorporation of any conditions of the FAA determination into City project approval, would ensure that the height of the proposed sign would not be a hazard to aircraft operation. **(Less Than Significant Impact)**

Sign Operational Standards

The FAA review does not evaluate the operational details of signs. The proposed sign would be located adjacent to the north side of US 101, approximately 1,800 feet northwest of Runway 30R-12L and 1.5 miles away from the Airport Traffic Control Tower at the Norman Y. Mineta San Jose International Airport. The center of the sign is approximately 55 feet above ground level and the viewing height on the Air Traffic Control Tower Observation deck is approximately 98 feet above ground level.

As discussed in Section 4.1, *Aesthetics*, the most conservative brightness limit with which the proposed billboard would have to comply is 500-foot lamberts,[24] which is equivalent to 1713 nits. The project proposes to operate the sign's nighttime limit at about 300 nits (which equates to 0.3

[24] This calculation assumes a minimum measures brightness in the field of view of less than 10 foot-lamberts, and a view angle of zero degrees (i.e., directly in front of the driver).

footcandles at 250 feet),[25] meaning that the sign would always operate at one-sixth of the brightness level for CEVMs, as set forth by state law. Additionally, the light levels emitted from the billboard would be set to adjust based upon ambient light conditions at any given time (i.e., nighttime versus daytime).

Impacts to the Airport Control Tower

The proposed LED digital billboard on Laurelwood Road would have one display facing southeast towards the San José International Airport and the airport control tower. The display would be positioned nearly 90 degrees perpendicular to Laurelwood Road, with the actual angle being 84 degrees. The main view of the signage would be for the drivers on northbound US 101. These motorists would see the largest area (most square footage) of the billboard face based on their direct viewing angles.

According to the sign manufacturer, the maximum brightness to the airport control tower in a vertical orientation would be 300 nits or candelas per meter squared (cd/m^2). Based on the orientation of the sign, direct views of the sign area are substantially less from the airport control tower, compared to views of the sign from US 101. The main concern for the airport control tower would be the brightness of the sign; however, as a result of the orientation of the sign, the tower would not have a direct view of the main brightness of the sign as the airport control tower is located 60 degrees off axis from the main brightness of the sign display.

The brightest source of light in the vicinity of the proposed sign are lights at the Levi's Stadium. The proposed LED digital billboard display would not be the brightest object in view and would have more systems in place to control the brightness than other lit objects around the site. As noted above, the tower has a limited view of the sign, and will not have the views of the main brightness of the sign. The brightness of the proposed LED digital billboard, therefore, is not anticipated to adversely affect operations at the airport control tower.

Impacts to Pilots

Based on the position of the proposed single-sided face, the only visible side of the billboard to oncoming aircraft would be to the southeast, facing towards the airport and airport control tower. The only aircraft affected by views of the sign would be planes touching down on the southeastern portion of the runway, traveling in a northwesterly direction. For the aircraft landing in the other direction (from the northwest), the proposed billboard would not be visible.

Only pilots in aircraft landing to the southeast on Runways 12L and 12R, (looking to the northwest), would have a direct view of the proposed billboard. Aircraft would view the largest surface area of the billboard at approximately 2,000 feet away from the billboard located at the end of the runway. All of the other views in the air would be of a smaller visible surface area due to the viewing angle of the pilots as they land.

[25] Setting a standard in foot candles is a more appropriate metric by which to judge impacts on sensitive receptors, as a foot candela measures light intensity experience at the receptor, whereas measurement in candela/square meters or nits reveals only the intensity of light at its source.

There are also other brighter visual objects in the pilot's field of view when looking toward the proposed sign, when they are landing on Runways 12L and 12R, such as the Levi's Stadium which was documented from a previous report for the San José Earthquakes Stadium on Coleman Avenue. When compared to other lighted elements, the LED digital display signage would not be the brightest object in view and would have more systems in place to control the brightness than other lit objects around the site. Therefore, the brightness of the proposed LED digital billboard is not anticipated to adversely affect the pilot's ability to fly safely into the airport, as they have such a limited view of the sign, and would not have direct views showing the full brightness of the sign.

In summary, the proposed billboard would not result in a significant safety hazard to operations at San José International Airport. **(Less Than Significant Impact)**

4.9.3.3 *Other Hazards*

Routine Transport, Use, or Disposal of Hazardous Materials and Other Hazards

The proposed project would not involve the routine transport, use, or disposal of hazardous materials. The proposed project is not located within one-quarter mile of a school. The proposed project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Cortese List sites).[26] **(No Impact)**

Implementation of Safety Plans

The billboard foundation would be relatively small and would not impair implementation of adopted emergency response or evacuation plans. **(No Impact)**

Wildland Fire Hazards

The billboard would be located in an urban, developed area and would not be subject to wildland fires. **(No Impact)**

4.9.4 Conclusion

With implementation of the mitigation measures identified above, construction of a new billboard and removal of two existing billboard facings would not result in significant hazardous materials impacts associated with possible soil contamination and/or release of hazardous materials. **(Less Than Significant Impact with Mitigation)**

Operation of the proposed LED digital billboard would not result in safety hazards to aircraft or airport operations. **(Less Than Significant Impact)**

[26] California Environmental Protection Agency. Cortese List Data Resources. Accessed June 2021. https://calepa.ca.gov/sitecleanup/corteselist/

4.10 HYDROLOGY AND WATER QUALITY

4.10.1 Setting

4.10.1.1 *Water Quality*

The proposed LED digital billboard site is located in an urban area. Stormwater from the project site drains into the City of Santa Clara storm drain system. Water collected by the storm drain system contains varying amounts of non-point source pollutants associated with urban uses (e.g., roadway/street contaminants, litter, residential maintenance/landscaping supplies, etc.). Excessive precipitation can carry these non-point pollutants into downstream drainages. Runoff from the project site eventually empties into the Guadalupe River and San Francisco Bay.

4.10.1.2 *Groundwater*

The site is underlain by the Santa Clara Plain, Confined, subbasin. In spring 2019, groundwater in the area was recorded at an elevation of about 90.7 feet above sea level.[27]

4.10.1.3 *Dam Failure*

Passed in 2017, SB 92 requires all state jurisdictional dams, except low hazard dams, to develop emergency action plans with inundation maps for emergency preparedness. Inundation maps are approved by the Department of Water Resources.

The Association of Bay Area Governments (ABAG) compiled the dam failure inundation hazard maps submitted to the State Office of Emergency Services by dam owners throughout the Bay Area. Based upon information in the Santa Clara 2010-2035 General Plan, the Laurelwood Road site is located in the Lexington Reservoir (James J. Lenihan Dam) and Anderson Lake (Leroy Anderson Dam) dam failure inundation hazard zones.

4.10.1.4 *Drainage and Flooding*

The project site is located in the Guadalupe River watershed. According to the Federal Management Agency (FEMA), the project site is located in Zone X, which is an area outside the 0.2 percent floodplain.[28]

4.10.1.5 *Seiches, Tsunamis, and Mudflows*

A seiche is an oscillation of the surface of a lake or landlocked sea varying in period from a few minutes to several hours. There are no landlocked bodies of water near the project site that in the event of a seiche will affect the site.

A tsunami of tidal wave is a series of water waves caused by the displacement of a large volume of a body of water, such as an ocean or large lake. Due to the immense volumes of water and

[27] Santa Clara Valley Water District. *Annual Groundwater Report for Calendar Year 2019*. https://www.valleywater.org/sites/default/files/2020-09/2019_Annual_Groundwater_Report_Web_Version.pdf. Accessed May 7, 2021.

[28] Federal Emergency Management Agency. *Community Panel Number 06085C0064H*. May 18, 2009. http://msc.fema.gov/portal. Accessed May 7, 2021.

energy involved, tsunamis can devastate coastal regions. There are no bodies of water near the project site that in the event of a tsunami will affect the site.[29]

A mudflow is the rapid movement of a large mass of mud formed from loose soil and water. The project area is flat and there are no mountains near the site that in the event of a mudflow will affect the site.

4.10.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
HYDROLOGY AND WATER QUALITY. Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐	1
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐	1
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐	1
i) Result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐	1
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐	1
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐	1
iv) impede or redirect flood flows?	☐	☐	☒	☐	1
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐	1, 16, 17, 18
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒	1

[29] Association of Bay Area Governments. *Tsunami & Additional Hazards*. https://abag.ca.gov/our-work/resilience/data-research/tsunami-additional-hazards. Accessed May 7, 2021.

4.10.3 Hydrology and Water Quality Impacts

Installation of the proposed LED digital billboard would not measurably increase stormwater runoff from the 630 Laurelwood Road project site. Construction of the billboard's foundation structure would result in a small footprint in an already paved area that would not substantially impact the amount of runoff from the site or substantially increase impervious surfaces compared to existing conditions. The project site is flat, and, therefore, the potential for erosion on the site is low. For these reasons, the proposed project would not create additional runoff, diminish water quality as a result of erosion, or otherwise substantially degrade water quality. The proposed project would not result in a significant increase in impervious surfaces and does not require a water supply. Therefore, the proposed project would not decrease groundwater supplies or significantly interfere with groundwater recharge. As a result, the proposed project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. The project is located within the Lexington Reservoir and Anderson Lake dam failure inundation hazard zones; however, due to existing protections in place dam failure is unlikely and it is not probable that the project would be impacted by dam failure. The project involves a five-foot diameter foundation and its small footprint would not impede or redirect flood flows. The project would not require the use of groundwater or interfere with groundwater recharge, and would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. The project site is not subject to inundation by seiche, tsunami, or mudflow. **(Less Than Significant Impact)**

4.10.4 Conclusion

Construction and operation of the proposed project would not result in hydrology or water quality impacts. **(Less Than Significant Impact)**

4.11 LAND USE

4.11.1 Setting

The proposed LED digital billboard would be located at 630 Laurelwood Road on a parcel zoned *ML- Light Industrial* and designated *Light Industrial* in the City of Santa Clara General Plan. The project site parcel is currently developed with light industrial buildings and paved parking areas, and surrounded by industrial and office land uses.

The LED digital billboard would be situated adjacent to the southwest corner of the existing easterly light industrial/storage building. Upon completion, the proposed single-sided billboard would be oriented to be visible to vehicles driving in the northbound direction on US 101. The proposed billboard site is in the vicinity of several permitted billboards along US 101.

The billboard facings proposed for removal are located on properties designated for *Community Mixed Use* (2983 El Camino Real) in the Santa Clara General Plan. The 2983 El Camino Real site is zoned for *CT – Thoroughfare Commercial*. The 2629 San Bruno site in San Francisco is designated as *Neighborhood Commercial District* and the 4580 MacArthur site in Oakland is designated as *Neighborhood Center Mixed Use*.

4.11.1.1 *Applicable Land Use Plans, Policies, and Regulations*

Land Use Designation and Zoning

The proposed LED digital billboard site is zoned *ML – Light Industrial* which is a district that is intended to provide an optimum general industrial environment and to accommodate industries operating substantially within an enclosed building (City Code, Section 18.48.020). Billboards are not expressly identified as a permitted use in the *ML – Light Industrial* zone.

Conditional uses may be established in *ML – Light Industrial* zoning districts only by first securing a Use Permit (UP) (Section 18.48.040). Such use permits shall not be granted if the proposed use or structure would be objectionable or detrimental to adjacent properties or to the industrial area in general by reason of traffic, parking, noise, inappropriate design, or signs.

Conditional uses are encouraged to be conducted within industrial and office buildings in order to maintain the industrial character of the zoning district. Although the proposed billboard is not an identified permitted or conditional use for *ML – Light Industrial* zones, the Planning Commission has the discretion to authorize additional uses through the UP process if the Commission determines that the land use is appropriate for an industrial area and would not be detrimental to the surrounding permitted uses.

Santa Clara City Code

Chapter 18.80 *Sign Regulations* of the City Code was adopted for the purpose of avoiding or mitigating adverse effects associated with visual clutter and traffic safety. The City encourages the removal of existing billboards, and the maintenance and upgrading of advertising devices to current standards. The ordinance limits the number of billboards permitted in Santa Clara, "in order to improve the quality of urban life for its citizens."

4.11.1.2 *Other Applicable Plans and Regulations*

Federal and State of California
Outdoor Advertising Act and Regulations

The California Outdoor Advertising Act and the Federal Highway Beautification Act are both laws that apply to advertising signs along primary highways and freeways. The California Outdoor Advertising Act is implemented through regulations adopted by Caltrans. Section 21466.5 of the California Vehicle Code also includes criteria for illuminated signs visible from roadways. These regulations set forth design standards for billboards with the primary purpose of minimizing traffic safety hazards for motorists.

Norman Y. Mineta San José International Airport Comprehensive Land Use Plan

The Norman Y. Mineta San José International Airport (Airport) is located southeast of the 630 Laurelwood Road site and the site is within the Airport Influence Area (AIA). As described in

Section 4.9, *Hazards and Hazardous Materials*, the AIA is a composite of areas surrounding the airport that are affected by noise, height and safety considerations.[30]

Applicable Comprehensive Land Use Plan (CLUP) policies for development within the AIA include the following:

- **G-5:** Where legally allowed, dedication of an aviation easement to the City of San Jose shall be required to be offered as a condition of approval on all projects located within the AIA.

- **G-6:** Any proposed uses that may cause a hazard to aircraft in flight are not permitted within the AIA. Such uses include electrical interference, high intensity lighting, attraction of birds, and activities that may produce smoke, dust, or glare.

- **G-7:** All new exterior lighting or large video displays within the AIA shall be designed so as to create no interference with aircraft operations. Such lighting shall be constructed and located so that only the intended area is illuminated and off-site glare is fully controlled. The lighting shall be arrayed in such a manner that it cannot be mistaken for airport approach or runway lights by pilots.

- **H-2:** Any project that may exceed a Federal Aviation Regulation (FAR) Part 77 surface must notify the FAA.

- **S-1:** . . . [T]he Safety Zone Compatibility Policies presented in Table 4-2 shall be used to determine if a specific land use is consistent with the CLUP. Safety impacts shall be evaluated according to the Airport Safety zones presented on Figure 7.

According to Figure 7 of the CLUP, the project site is located within the Inner Safety Zone (ISZ). Pursuant to CLUP Table 4-2, the maximum population density in the ISZ is as follows:

> Nonresidential, maximum 120 people per acre (includes open area and parking area required for the building's occupants and one-half of the adjacent street area).

The open space requirements of the ISZ are as follows:

> 30 percent of gross area open. No structures or concentrations of people between or within 100 feet of the extended runway centerlines.

Finally, the allowable land uses within the Inner Safety Zone are as follows:

> No residential. Nonresidential uses should be activities that attract relatively few people. No shopping centers, restaurants, theaters, meeting halls, stadiums, multi-story office buildings, labor-intensive manufacturing plants, educational facilities, day care facilities,

[30] Santa Clara County Airport Land Use Commission. *Comprehensive Land Use Plan: Norman Y. Mineta San José International Airport.* May 2011, Amended November 2016.

hospitals, nursing homes or similar activities. No hazardous material facilities (gasoline stations, etc.).

4.11.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
LAND USE. Would the project:					
a) Physically divide an established community?	☐	☐	☐	☒	1
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐	1, 2, 3

4.11.3 Land Use Impacts

4.11.3.1 *Division of an Established Community*

The project does not include the construction of freeways, major roadways, railroad lines, or any other divisive feature and would not, therefore, physically divide an established community. **(No Impact)**

4.11.3.2 *Possible Conflicts with Applicable Plans, Policies and Regulations*

Santa Clara City Code and State Regulations

As discussed in Section 4.11.1.1, the Santa Clara City Code (Zoning) allows identified conditional uses within the *ML-Light Industrial* zoning district if the proposed use or structure would not be objectionable or detrimental to adjacent properties or to the industrial area in general by reason of traffic, parking, noise, inappropriate designs, or signs. Although billboard displays are not expressly identified as a permitted or conditional use in the *ML-Light Industrial* zoning district, the Planning Commission has the discretion to authorize additional uses under these zoning designations through the Use Permit process if the Commission determines that the land use is appropriate for an industrial area.

The proposed billboard site is in the vicinity of several permitted billboards along US 101 and would be an addition to the other billboards and a message sign in the area. The proposed billboard would be 60 feet in height, which would exceed the maximum height limit of 35 feet for outdoor signs (Santa Clara City Code, Section 18.80.050). A text amendment is proposed for the Zoning Ordinance that would allow digital billboard signs to exceed the height limit in Section 18.80.050 with a UP. The proposal includes a UP that would allow the proposed billboard height.

If the Planning Commission finds that the proposed billboard is consistent with other permitted uses, then the approval of a UP would be consistent with the zoning ordinance and, therefore, a

less than significant land use impact. If the Planning Commission finds that the proposed billboard is inconsistent with the permitted uses, then approval of the project would violate the zoning ordinance and the project could not be approved.

Illuminated signs could be considered a traffic safety hazard given the potential of light and glare to distract drivers. Section 21466.5 of the California Vehicle Code regulates illumination by placing limits on maximum light output. The Code generally considers a light source to be impairing when the light source exceeds 1,000 times the minimum measured brightness in a driver's field of view, within 10 degrees of that field of view. The proposed LED digital billboard would not exceed this threshold. Light levels emitted from the billboard would adjust to respond to ambient conditions and thereby avoid excessive brightness.

While both the City and the Caltrans Outdoor Advertising Act stress the importance of limiting light and glare for the safety of drivers, neither agency defines formal requirements regarding brightness or light intensity of advertising signs. The project therefore commits to a maximum ambient light output level of 0.3 footcandles at a distance of 250 feet from the billboard, as recommended by the OAAA for a sign of the proposed size. The light levels emitted from the billboard would be set to adjust, based upon ambient light conditions at any given time (i.e., nighttime versus daytime). By committing to OAAA standards for illuminated signs, the project would result in safe levels of illumination that take into account the concerns of the City and Caltrans.

In conformance with Caltrans requirements and the City of Santa Clara City Code, the proposed LED digital billboard would not include moving images or sound. Caltrans standards require that images rotate no more than once every four seconds. The proposed billboard will rotate images at a rate no greater than once every eight seconds.

The Santa Clara City Code establishes that billboards, by their very nature, however constructed, constitute visual clutter and blight to the appearance of the City. The intention of the City is to limit and reduce the number of billboards in order to "improve the quality of urban life for its citizens." The Billboard Relocation Agreement for the proposed project requires the removal of four existing billboard facings (at three locations) on local City streets and State Route 82 (El Camino Real), in exchange for the installation of the proposed single-sided billboard along US 101. In addition, the proposed project would remove one facing in compliance with the California Business and Professions Code. Therefore, the project would result in an overall reduction of five billboard facings within the City, and the relocation of advertisements from local City streets to US 101 where advertisements would be largely directed at through-traffic. The project would support the City's intent to reduce the number of overall billboards in the City and would, therefore, reduce visual blight throughout the City.

Federal regulations require the proposed sign structure to be submitted to the FAA for airspace safety review. The FAA has reviewed the project and made a determination of No Hazard in accordance with FAR Part 77, consistent with CLUP policies (**Appendix B**). FAA issuance of a Determination of No Hazard, and incorporation of any conditions of the FAA determination into City project approval, would ensure that the height of the proposed sign would not be a hazard to

aircraft operation, in accordance with CLUP policies. In addition, the proposed project would not increase the population of the site or attract people to the site, and, therefore, does not conflict with the population density requirements identified in the CLUP.

The project would comply with the requirements of Chapter 18.80, *Sign Regulations* of the Santa Clara City Code, the Caltrans Outdoor Advertising Act, Section 21466.5 of the California Vehicle Code, and CLUP. With compliance to these regulations and approval of the proposed UP, the project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. **(Less Than Significant Impact)**

4.11.4 Conclusion

A finding of consistency by the Planning Commission through approval of the UP means that the proposed use is considered consistent with the City's land use policies at this specific site at 630 Laurelwood Road and the project would not have a significant impact on surrounding light industrial or office uses. **(Less Than Significant Impact)**

4.12 MINERAL RESOURCES

4.12.1 Setting

The Santa Clara Valley was formed when sediments derived from the Santa Cruz Mountains and the Mt. Hamilton-Diablo Range were exposed by continued tectonic uplift and regression of the inland sea that had previously inundated this area. As a result of this process, the topography of the area is relatively flat and there are no mapped mineral resources.[31]

4.12.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
MINERAL RESOURCES. Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒	1, 2
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒	1, 2

[31] Stanley, R. G., R. C. Jachens, P. G. Lillis, R. J. McLaughlin, K. A. Kvenvolden, F. D. Hostettler, K. A. McDougall, and L. B. Magoon. 2002. *Subsurface and petroleum geology of the southwestern Santa Clara Valley ("Silicon Valley"), California.* (Professional Paper 1663) Washington, DC: U. S. Government Printing Office.

4.12.3 Mineral Resources Impacts

The proposed project site is within a developed urban area and it does not contain any known or designated mineral resources. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. There would be no impact. **(No Impact)**

The project area does not support any mineral extraction activities, and no known mineral deposits exist in the project area. Therefore, implementation of the proposed project would not result in the loss of availability of a locally-important mineral recovery site delineated in a local general plan, specific plan, or other land use plan. There would be no impact. **(No Impact)**

4.12.4 Conclusion

The project would not result in any impact to mineral resources. **(No Impact)**

4.13 NOISE

4.13.1 Setting

4.13.1.1 *Noise Background*

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB) with 0 dB corresponding roughly to the threshold of hearing. Most of the sounds which we hear in the environment do not consist of a single frequency, but rather a broad band of frequencies, with each frequency differing in sound level. The intensities of each frequency add together to generate a sound. The method commonly used to quantify environmental sounds consists of evaluating all of the frequencies of a sound in accordance with a weighting that reflects the fact that human hearing is less sensitive at low frequencies and extreme high frequencies than in the frequency mid-range. This is called "A" weighting, and the decibel level so measured is called the A-weighted sound level (dBA). In practice, the level of a sound source is measured using a sound level meter that includes an electrical filter corresponding to the A-weighting curve.

Although the A-weighted noise level may adequately indicate the level of environmental noise at any instant in time, community noise levels vary continuously. Most environmental noise includes a conglomeration of noise from distant sources which create a relatively steady background noise in which no particular source is identifiable. To describe the time-varying character of environmental noise, the statistical noise descriptors, L_{01}, L_{10}, L_{50}, and L_{90}, are commonly used. They are the A-weighted noise levels equaled or exceeded during one percent, 10 percent, 50 percent, and 90 percent of a stated time period. A single number descriptor called the L_{eq} is also widely used. The L_{eq} is the average A-weighted noise level during a stated period of time. Community Noise Equivalent Level (CNEL) measurements are the weighted average of sound levels gathered throughout a 24-hour period. This is essentially a measure of ambient noise.

In determining the daily level of environmental noise, it is important to account for the difference in response of people to daytime and nighttime noises. During the nighttime, exterior background noises are generally lower than daytime levels. Most household noise also decreases at night and

exterior noises become more noticeable. Furthermore, most people sleep at night and are very sensitive to noise intrusion. To account for human sensitivity to nighttime noise levels, a descriptor, L_{dn} (day/night average sound level), was developed. The L_{dn} divides the 24-hour day into the daytime of 7:00 AM to 10:00 PM and the nighttime of 10:00 PM to 7:00 AM. The nighttime noise level is weighted 10 dB higher than the daytime noise level.

4.13.1.2 *Applicable Noise Standards and Policies*

The State of California and the City of Santa Clara have established guidelines, regulations, and policies designed to limit noise exposure at noise sensitive land uses. Appendix E of the State CEQA Guidelines, the State of California Building Code, and the City of Santa Clara's Noise Element of the General Plan present the following applicable criteria:

State CEQA Guidelines. CEQA contains guidelines to evaluate the significance of effects resulting from a proposed project. These guidelines have been used in this Initial Study as thresholds for establishing potentially significant noise impacts and are listed under *Thresholds of Significance*.

City of Santa Clara General Plan. Based on City's General Plan Noise Element, Table 4.13-1 shows the noise levels considered compatible with specific land uses, the CNEL. Residential land uses are considered compatible with CNEL noise levels of up to 55 dBA and acceptable with design and insulation techniques in areas with CNEL noise levels up to 70 dBA.

Table 4.13-1
Noise and Land Use Compatibility (CNEL)

Land Use	50	55	60	65	70	75	80	85
Residential								
Educational								
Recreational								
Commercial								
Industrial								
Open Space								

	Compatible
	Require Design and insulation to reduce noise levels
	Incompatible. Avoid land use except when entirely indoors and an interior noise level of 45 dBA can be maintained

Source: City of Santa Clara 2010-2035 General Plan

City of Santa Clara General Plan Noise Policies. The following General Plan policies are applicable to the proposed billboard project:

- *Policy 5.10.6-P1*: Review all land use and development proposals for consistency with the General Plan compatibility standards and acceptable noise exposure levels defined on Table 5.10-1.
- *Policy 5.10.6-P2*: Incorporate noise attenuation measures for all projects that have noise exposure levels greater than General Plan "normally acceptable" levels, as defined on Table 5.10-1.

Santa Clara City Code. Section 9.10.230 of the Santa Clara City Code regulates hours of construction operations for a construction site within 300 feet of residentially zoned properties. Construction hours are limited to 7:00 A.M. to 6:00 P.M. on weekdays other than holidays, Monday through Friday, and within the hours of 9:00 A.M. to 6:00 P.M. on any Saturday which is not a holiday.

4.13.1.3 *Existing Noise Conditions*

The major sources of outdoor noise in the project area include noise from traffic along major roadways including US 101 and Laurelwood Road, as well as from the Airport. Noise sources near the two existing billboard sites for removal include traffic noise along El Camino Real, and Highway 580 or US 101. The proposed LED digital billboard site and billboards proposed for removal are located in areas exposed to noise levels ranging from 70-75 CNEL along El Camino Real and at 630 Laurelwood Road, due primarily to traffic and airport noise.

There are no noise-sensitive uses within the immediate vicinity of the project site. Noise-sensitive use within the immediate vicinity of the billboard removal sites are: individual residences north of the 2983 El Camino Real billboard; residences to the east and west across US 101 from the 2629 San Bruno billboard; and residences, lodging, and a church to the north, east, and west of the 4580 MacArthur billboard. Exterior noise levels at these properties generally range from 70-75 CNEL due to traffic and airport noise.[32]

4.13.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
NOISE. Would the project:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐	1, 2
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐	1
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐	1

[32] City of Santa Clara. Laurelwood LED Digital Billboard Project Initial Study. September 2015.

4.13.3 Noise Impacts

4.13.3.1 *Long-Term Noise Impacts*

The proposed LED digital billboard is not designed to emit any sound, and the project would not generate regular vehicle trips. The operation of the proposed billboard would not, therefore, result in a permanent increase in ambient noise levels or expose people to excessive noise levels associated with the Airport. **(No Impact)**

4.13.3.2 *Short-Term Construction Noise Impacts*

Proposed Billboard Removals

Noise levels in the project areas would increase during activities associated with removal of the two existing billboard facings. Removal of the two billboard structures would take approximately two to four days involve the use of hand tools and small crane rigs.

Noise impacts associated with construction demolition are considered significant if hourly noise levels received at noise sensitive land uses are 60 dBA L_{eq} and are at least five dBA L_{eq} above the ambient noise environment when the duration of the noise-generating activities last more than one year. Demolition-related noise, which would involve hand tools and small cranes which generally produce a maximum noise level of about 70 to 85 dBA at 50 feet, would be relatively low compared to ambient noise in the project area, where vehicle and airport traffic combine to generate community noise levels of 70 to 75 dBA. Demolition noise may be more noticeable at the adjacent residences in the vicinity of the San Francisco and Oakland sites; however, noise from demolition (removing billboard facings over a two to four day period) would be of short-duration. Compliance with the City's permissible hours of construction would ensure that construction noise would not result in a substantial temporary increase in ambient noise levels that would result in nighttime annoyance or sleep disturbance of nearby sensitive receptors. Construction of the sign, which would constitute the majority of short-term construction operations, is located about 2,000 feet from the nearest sensitive receptor and, therefore, such construction activities would not be detectable by such receptors. Therefore, the proposed project would not expose sensitive receptors to excessive construction noise levels or groundborne vibration, nor result in a substantial temporary increase in ambient noise levels at the two locations where billboard facings removal is proposed. **(Less Than Significant Impact)**

Construction activities may result in temporary annoyances to existing industrial and commercial uses in the immediate project area. Given the short duration of construction and billboard removal activities (approximately one to two days per site), the proposed project would not result in significant short-term construction-related noise impacts. **(Less Than Significant Impact)**

Proposed LED Digital Billboard

Noise levels in the immediate vicinity of 630 Laurelwood Road would increase during activities associated with construction of the LED digital billboard. Noise associated with construction of the proposed billboard would occur over a period of approximately five to seven days.

Construction-related noise would be negligible compared to ambient noise in the project area, where traffic on US 101, Laurelwood Road, and airport traffic combine to generate community noise levels of 65 to 75 dBA. Given the existing noise environment, lack of sensitive receptors, and short duration of construction, short-term noise impacts would be less than significant. **(Less Than Significant Impact)**

4.13.4 Conclusion

The proposed project would not result in significant noise impacts. **(Less Than Significant Impact)**

4.14 POPULATION AND HOUSING

4.14.1 Setting

As of 2019, the City of Santa Clara has a total population of 130,365 residents.[33] In 2019, there were 44,669 households with an average of 2.74 persons per household.[34] According to the City's General Plan, the projected population in 2035 will be 154,825 residents, 60,435 households, 154,280 total jobs and 86,800 employed residents.

4.14.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
POPULATION AND HOUSING. Would the project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒	1
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒	1

4.14.3 Impacts to Population and Housing

The proposed project does not have any features that will affect population and housing. The project would not induce population or job growth or displace housing or persons. **(No Impact)**

4.14.4 Conclusion

The proposed project would not result in impacts to population and housing. **(No Impact)**

[33] United States Census Bureau. *U.S. Census Bureau QuickFacts*. https://www.census.gov/quickfacts/fact/table/santaclaracitycalifornia/PST045219 (July 1, 2019). Accessed May 11, 2021.
[34] Ibid.

4.15 PUBLIC SERVICES

4.15.1 Setting

Fire protection services are provided by the City of Santa Clara Fire Department (SCFD), which consists of ten stations distributed throughout the City. The closest fire station to the proposed LED digital billboard site is Station 6, located at 888 Agnew Road, which is approximately 1.2 miles to the north. Police protection services are provided by the City of Santa Clara Police Department (SCPD). Police headquarters are located at 601 El Camino Real, approximately 1.7 miles south of the project site.

4.15.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
a) Fire protection?	☐	☐	☐	☒	1
b) Police protection?	☐	☐	☐	☒	1
c) Schools?	☐	☐	☐	☒	1
d) Parks?	☐	☐	☐	☒	1
e) Other public facilities?	☐	☐	☐	☒	1

4.15.3 Impacts to Public Services

The project includes installation of a LED digital billboard in an industrial and office area and removal of two existing billboard facings. The project would not generate new residents or employment and would be constructed in conformance with current codes and regulations. The project would not increase the need for police or fire services or demand for schools, parks, or any other public facilities in the project area.

4.15.3.1 *Parks & Recreation*

City of Santa Clara City Code Chapter 17.35

The purpose of City code Chapter 17.35 is to help mitigate the impacts of new housing development growth on existing parkland and recreational facilities subject to the provisions of the State of California Quimby Act (Quimby Act) and/or the California Mitigation Fee Act (MFA). Chapter 17.35 requires new residential developments to provide developed park and recreational land and/or pay a fee in lieu of parkland dedication, at the City's discretion. The City is meeting

the parkland dedication standard of 3 acres per 1,000 residents per the Quimby Act provisions of the City Code and 2.6 acres per 1,000 residents per the MFA provisions of the City Code with regard to neighborhood parks.

The Santa Clara Parks and Recreation Department (Department) provides parks and recreational services in the City. The Department is responsible for maintaining and programming the various parks and recreation facilities and works cooperatively with public agencies in coordinating all recreational activities within the City. Overall, as of August 2021, the Department maintains and operates Central Park, a 45.04-acre community park (45.04 acres improved and Central Park North 34.93 acres unimproved, resulting in 79.97 acres), 30 neighborhood parks (125.429 acres improved and 5.220 acres unimproved resulting in 130.649 acres), 13 mini parks (2.59 acres improved and 3.189 acres unimproved resulting in 5.779 acres), public open space (16.13 acres improved and 40.08 acres unimproved resulting in 56.21 acres), recreational facilities (23.898 acres improved and excluding the Santa Clara Golf and Tennis Club/BMX track), recreational trails (7.59 acres improved and 0.20 acres unimproved resulting in 7.79 acres), and joint use facilities (48.588 acres) throughout the City totaling approximately 269.265 improved acres and 83.619 unimproved acres. Community parks are over fifteen acres, neighborhood parks are one to fifteen acres and mini parks are typically less than one acre in size.

Santa Clara City Code Chapter 17.35 requires new residential developments to provide developed park and recreational land and/or pay a fee in-lieu thereof, at the discretion of the City, and pursuant to the Quimby Act and/or the MFA. The City is meeting the standard of 3 acres per 1,000 residents per the Quimby Act provisions of the City Code and 2.60 acres per 1,000 residents per the MFA provisions of the City Code. The proposed project would not be subject to City Code Chapter 17.35 as there is no residential component to the project. (**No Impact**)

4.15.4 Conclusion

The project would not result in impacts to public services of facilities. **(No Impact)**

4.16 RECREATION

4.16.1 Setting

4.16.1.1 *City of Santa Clara City Code Chapter 17.35*

The purpose of City code Chapter 17.35 is to help mitigate the impacts of new housing development growth on existing parkland and recreational facilities subject to the provisions of the Quimby Act and/or the MFA. Chapter 17.35 requires new residential developments to provide developed park and recreational land and/or pay a fee in lieu of parkland dedication, at the City's discretion. The City is meeting the parkland dedication standard of 3 acres per 1,000 residents per the Quimby provisions of the City Code and 2.6 acres per 1,000 residents per the MFA provisions of the City Code with regard to neighborhood parks.

The Santa Clara Parks and Recreation Department (Department) provides parks and recreational services in the City. The Department is responsible for maintaining and programming the various parks and recreation facilities and works cooperatively with public agencies in coordinating all

recreational activities within the City. Overall, as of August 2021, the Department maintains and operates Central Park, a 45.04-acre community park (45.04 acres improved and Central Park North 34.93 acres unimproved, resulting in 79.97 acres), 30 neighborhood parks (125.429 acres improved and 5.220 acres unimproved resulting in 130.649 acres), 13 mini parks (2.59 acres improved and 3.189 acres unimproved resulting in 5.779 acres), public open space (16.13 acres improved and 40.08 acres unimproved resulting in 56.21 acres), recreational facilities (23.898 acres improved and excluding the Santa Clara Golf and Tennis Club/BMX track), recreational trails (7.59 acres improved and 0.20 acres unimproved resulting in 7.79 acres), and joint use facilities (48.588 acres) throughout the City totaling approximately 269.265 improved acres and 83.619 unimproved acres. Community parks are over fifteen acres, neighborhood parks are one to fifteen acres and mini parks are typically less than one acre in size.

Santa Clara City Code Chapter 17.35 requires new residential developments to provide developed park and recreational land and/or pay a fee in-lieu thereof, at the discretion of the City, and pursuant to the Quimby Act and/or the MFA. The City is meeting the standard of 3 acres per 1,000 residents per the Quimby provisions of the City Code and 2.60 acres per 1,000 residents per the MFA provisions of the City Code. The proposed project would not be subject to City Code Chapter 17.35 as there is no residential component to the project. (**No Impact**)

4.16.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
RECREATION. Would the project:					
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒	1
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒	1

4.16.3 Recreational Impacts

The project would not increase the usage of existing parks and recreation facilities, nor require the construction of new or expanded recreational facilities. **(No Impact)**

4.16.4 Conclusion

The proposed project would not result in impacts to recreation. **(No Impact)**

4.17 TRANSPORTATION

4.17.1 Setting

The proposed project would construct a LED digital billboard at 630 Laurelwood Road in the City of Santa Clara. The billboard would be oriented to be visible to vehicles travelling in the northbound direction on US 101. The project also involves the removal of two existing billboard facings. The billboard facings proposed for removal are oriented to be visible to vehicles traveling eastbound on El Camino Real, traveling north on US 101 in San Francisco, or traveling west on Highway 580 and MacArthur Boulevard in Oakland.

4.17.1.1 *Roadway Network*

US 101 provides regional access to the 630 Laurelwood site. US 101 is an eight-lane freeway (three mixed-flow lanes and one HOV lane in each direction) north of Cochrane Road in Morgan Hill. US 101 provides connections to I-880, SR 237, and SR 87 in the Santa Clara/San José area. Existing access to and from the area is provided via interchanges at De La Cruz Boulevard and Lafayette Street.

Local access to the proposed LED digital billboard site is provided by Laurelwood Road, a two-lane local street with no centerline stripe with parking allowed on both sides of the roadway accessed via De La Cruz Boulevard, Keller Street, or Woodward Avenue.

4.17.1.2 *Transit, Pedestrian, and Bicycle Facilities*

The Santa Clara Valley Transportation Authority (VTA) provides transit service to the Santa Clara area. Bus routes with stops in the area operate on Montague Expressway in the vicinity of 630 Laurelwood Road and in the vicinity of the billboard facings to be removed. Pedestrian facilities are comprised of sidewalks, crosswalks, and pedestrian signals. There is a sidewalk only on the south side of Laurelwood Road, along the project's frontage. There are no bicycle paths, lanes, or routes in the project vicinity.

4.17.1.3 *Regulatory Setting*

California Outdoor Advertising Act and the Federal Highway Beautification Act

The California Outdoor Advertising Act and the Federal Highway Beautification Act (Acts) apply to signs located along primary highways and freeways. The Acts specify that if an on-site sign is located within 660 feet of the highway right-of-way, and it is a message center display (programmable electronic sign), the sign cannot be located within 1,000 feet of another message center display on the same side of the highway. Further, the Acts generally prohibit signs within 300 feet of the point of intersection of a highway or highway and railroad lines, and signs that could prevent any traveler of the highway from having a clear view of approaching vehicles for a distance of at least 500 feet.

City of Santa Clara Sign Code (City Code, Chapter 18.80)

Chapter 18.80 *Sign Regulations* of the City Code was adopted for the purpose of avoiding or mitigating adverse effects associated with visual clutter and traffic safety. One of the objectives of the regulations is to promote traffic safety and minimize distractions to motorists. These regulations set forth design standards for billboards to minimizing traffic safety hazards.

California Vehicle Code

In accordance with the California Vehicle Code, the brilliance of signs may not have a maximum light output exceeding 1,000 times the minimum measured brightness in a driver's field of view, within ten degrees of that field of view.

4.17.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
TRANSPORTATION. Would the project:					
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐	1, 2
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐	1
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐	1
d) Result in inadequate emergency access?	☐	☐	☐	☒	1, 2

4.17.3 Transportation Impacts

4.17.3.1 *Circulation System*

Billboards do not generate daily or regular trips (like a typical land use such as residential or commercial development). Billboards generate trips irregularly, as needed, for maintenance activities. Therefore, the project would not increase traffic congestion on the surrounding roadways or freeways. Construction-related traffic, including truck and construction worker trips, would not substantially affect traffic conditions during the short duration of project construction and sign removals. Given the proposed new signage is associated with the removal of various existing signs, maintenance trips are likely to decrease as a result of the project.

The proposed billboard installation and removals are located outside public rights-of-way and the proposed project would not affect any existing or planned transportation, pedestrian, bicycle, and

transit facilities, programs, plans, or ordinances. Construction-related traffic, including truck and construction worker trips, are de minimis, would take place over an extremely short duration, and would not substantially affect traffic conditions during the short duration of project construction of the new billboard and removal of the existing billboards.

The project would not, therefore, significantly affect the performance of the circulation system including roadways, freeways, and bicycle/pedestrian/transit facilities. The project would not conflict with an applicable congestion management program. **(Less Than Significant Impact/No Impact)**

4.17.3.2 *Vehicles Miles Traveled*

SB 743, which was codified in PRC Section 21099, required changes to the CEQA Guidelines regarding the analysis of transportation impacts. Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." As a result, the Governor's Office of Planning and Research (OPR) proposed changes to the CEQA Guidelines that identify vehicle miles traveled (VMT) as the most appropriate metric to evaluate a project's transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project.

In 2018, OPR released a technical advisory containing the recommendations regarding the assessment of VMT. The technical advisory provides recommendations for assessing VMT and significance thresholds for residential, office, retail, and transportation projects. As noted in the advisory, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT. The change to VMT was formally adopted as part of updates to the CEQA Guidelines on December 28, 2018. The deadline for adopting policies to implement SB 743 and the provisions of CEQA Guidelines Section 15064.3(b) was July 1, 2020.

The City approved its Transportation Analysis Policy on June 23, 2020.[35] This policy establishes Santa Clara land use and transportation project requirements for evaluating transportation impacts under CEQA using VMT methodology, including baselines, thresholds, as well as criteria for exempting certain types of projects from VMT analysis.

As stated above, billboards do not generate daily or regular trips (like a typical land use such as residential or commercial development). Billboards generate trips irregularly, as needed, for maintenance activities, and would not exceed 110 daily trips. Therefore, per the City's Transportation Analysis Policy, the proposed project would be categorized as a small project generating 110 daily trips or less, can be screened out from a quantitative VMT analysis, and would have a less than significant impact on VMT. **(Less Than Significant Impact)**

[35] City of Santa Clara. Transportation Analysis Policy. June 23, 2020. https://www.santaclaraca.gov/home/showpublisheddocument/71449/637459525139300000.

4.17.3.3 *Air Traffic and Transportation Facilities*

As discussed in Section 4.9, *Hazards and Hazardous Materials*, operation of the proposed LED digital billboard is subject to approval of a UP and all applicable Sign Code regulations related to the operational standards for programmable and non-programmable components of the billboard. Given the proposed operation of the dimmable LED display and viewing angles of the airport control tower and pilots landing aircraft, potential safety hazards to pilots and air traffic controllers are less than significant. In addition, the height of the proposed sign (60 feet) has been determined by the FAA to pose no hazard to aircraft. The project would not affect air traffic or conflict with any adopted policies, plans, or programs regarding the performance or safety of transportation facilities. **(Less Than Significant Impact)**

4.17.3.4 *Hazards to Transportation Operation and/or Motorist Safety*

Proposed Billboard Removals

The City's Sign Ordinance limits the number of billboards permitted in Santa Clara because it has "been determined that billboards impede traffic safety by unduly distracting motorists and pedestrians, creating traffic hazards, and reducing the effectiveness of signs needed to direct the public." The project includes the removal of four existing billboard facings along local roadways in the City in exchange for construction of the LED digital billboard along US 101. The project would result in an overall decrease of billboard facings throughout the City, which would improve overall traffic safety on City roadways. **(Less Than Significant/Beneficial Impact)**

Proposed LED Digital Billboard

The project would be subject to the Santa Clara City Code, which has regulations and design standards for billboards, the Caltrans Outdoor Advertising Act and Section 21466.5 of the California Vehicle Code. These regulations are focused on hazards associated with light and glare from illuminated signs which have the potential to distract drivers. For further discussion of these regulations see Section 4.1, *Aesthetics* of this Initial Study. Because the proposed billboard will be designed in compliance with these regulations the project would not substantially increase hazards related to design features along US 101. **(Less Than Significant Impact)**

4.17.3.5 *Emergency Access*

The proposed project would not change driveway access to the project site and there would continue to be two access points to the site for emergency access. Therefore, no impact would occur. (**No Impact**)

4.17.4 Conclusion

The proposed project would not result in significant transportation impacts. **(Less Than Significant Impact)**

4.18 TRIBAL CULTURAL RESOURCES

4.18.1 Setting

California Assembly Bill (AB) 52, in effect since July 2015, provides CEQA protections for tribal cultural resources. All lead agencies approving projects under CEQA are required, if formally requested by a culturally affiliated California Native American Tribe, to consult with such tribe regarding the potential impact of a project on tribal cultural resources before releasing an environmental document. Under California Public Resources Code (PRC) Section 21074, tribal cultural resources include site features, places, cultural landscapes, sacred places, or objects that are of cultural value to a tribe and that are eligible for or listed on the California Register of Historical Resources (CRHR) or a local historic register, or that the lead agency has determined to be of significant tribal cultural value.

No tribal cultural resources or Native American resources have been documented on the proposed digital LED billboard project site.[36]

In compliance with AB 52, the City sent a letter to Tamien Nation on November 15, 2021, notifying the tribe of the proposed project and soliciting a request for consultation.

4.18.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒	1, 2
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native America Tribe.	☐	☐	☐	☒	1, 2

[36] City of Santa Clara. *City of Santa Clara 2010-2035 General Plan*. Appendix 8.9 Historic Preservation and Resource Inventory.

4.18.3 Impacts to Tribal Cultural Resources

As described above in Section 4.5, *Cultural Resources*, the project area does not contain any known resources that are historically or culturally significant. In addition, tribal cultural resources have not identified by any California Native American Tribes during the required notification process. Therefore, no impacts to tribal cultural resources would occur. **(No Impact)**

4.18.4 Conclusion

No impacts to tribal cultural resources would occur from implementation of the proposed project. **(No Impact)**

4.19 UTILITIES AND SERVICE SYSTEMS

4.19.1 Setting

Utilities, including electricity, natural gas, water, sanitary sewer, and solid waste services are currently provided to the existing business at 630 Laurelwood Road. Water and sanitary sewer service are provided by the City of Santa Clara Water and Sewer Utilities. Silicon Valley Power supplies electricity to customers in the City of Santa Clara. The existing billboard structures proposed for removal have electric service for nighttime lighting from Silicon Valley Power.

4.19.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
UTILITIES AND SERVICE SYSTEMS. Would the project:					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would case significant environmental effects.	☐	☐	☒	☐	1
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒	1, 2
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒	1, 2

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
UTILITIES AND SERVICE SYSTEMS. Would the project:					
d) Generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐	1, 2
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒	1

4.19.3 Utilities and Service Systems Impacts

4.19.3.1 *Proposed Billboard Removals*

Removal of the two billboard structures would not generate demand for water or sewer service or increase stormwater runoff.

The project areas are served by landfills with adequate capacity for the next 10-20 years. The removal of two billboard facings would generate some waste materials that would be reused by the applicant or delivered to a recycling facility and/or disposed of at landfills that accept demolition waste from contractors in compliance with Federal, State, and local regulations. **(Less Than Significant Impact)**

4.19.3.2 *Proposed LED Digital Billboard*

The construction of the proposed billboard would generate some waste materials that would be reused by the applicant or delivered to a recycling facility and/or disposed of at landfills that accept demolition waste from contractors. Generally, there is capacity at landfills in northern California that are likely to receive solid waste materials that have not been diverted for resource recovery.

The operation of a billboard would not generate demand for water, sewer, and solid waste disposal at landfills. The proposed billboard would connect to existing electrical lines that run overhead along the perimeter of the property and serve the existing development at the site. The proposed billboard's electrical load of 19 KW is a minor load, and would have a less than significant impact of the utility system. Title 24 of the California Code of Regulations limits energy use for exterior signage in California. Energy efficiency requirements in the California Energy Code (Title 24) as well as dimming requirements for programmable (LED) billboards in the Outdoor Advertising Act would limit the energy demand for the display faces and new off-site electrical infrastructure is not needed to serve each site. In addition, as discussed in Section 4.10, *Hydrology*, the proposed billboard would have a relatively minimal footprint and would not substantially impact storm drain facilities. The proposed billboard would not generate demand for water or sewer service or increase stormwater runoff.

The installation of a billboard at 630 Laurelwood Road would not exceed the capacity of existing utility systems or require the construction of new facilities, the result of which could have adverse environmental effects. **(Less Than Significant Impact)**

4.19.4 Conclusion

The proposed project would not result in significant impacts to utility and service systems. **(Less Than Significant Impact)**

4.20 WILDFIRE

4.20.1 Setting

The project site is not located within moderate, high, or very high FHSZ, as designated by the California Department of Forestry and Fire Protection.[37]

4.20.2 Environmental Checklist and Discussion of Impacts

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒	1
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒	1, 19
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impact to the environment?	☐	☐	☐	☒	1
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes?	☐	☐	☐	☒	1

4.20.3 Wildfire Impacts

The project site is not located within or near a Very High Fire Hazard Severity Zones for wildfires and does not include habitable structures; therefore, the proposed project would not expose project occupants to a significant wildfire. The proposed project would comply with the applicable fire

[37] *California Fire Hazard Severity Zone (FHSZ) Viewer*. https://egis.fire.ca.gov/FHSZ/. Accessed May 14, 2021.

safety provisions of the California Building Code, as well as standard conditions of approval, thereby reducing the risk of damage from fire.

4.20.4 Conclusion

The proposed project would not result in increased wildfire impacts. **(No Impact)**

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Impacts	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	Checklist Source(s)
MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:					
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐	1-19
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐	1-19
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐	1-19

4.21.1 Project Impacts – Findings

As described in their respective sections of this Initial Study, measures are included in the proposed project to avoid or reduce impacts to a less than significant level. The project would comply with the requirements of Chapter 18.80 *Sign Regulations* of the Santa Clara City Code, the Caltrans Outdoor Advertising Act, and Section 21466.5 of the California Vehicle Code. These regulations set forth design standards for billboards with the primary purpose of minimizing traffic safety hazards. With compliance to these regulations, the proposed LED digital billboard would not create a new source of substantial light or glare and would not create traffic hazards along US 101.

The IS identifies mitigation and avoidance measures to reduce temporary, construction-related impacts to air quality. As described in Section 4.4, *Biological Resources*, with conformance to the mitigation measures identified to protect nesting birds, the project would not result in significant

impacts to wildlife. With implementation of the mitigation measure identified and described in Section 4.5, *Cultural Resources*, the proposed project would not result in significant environmental impacts related to archaeological or historic resources. The IS identifies mitigation measures to reduce potential exposure to hazardous materials. The project would reduce the total number of billboards in Santa Clara, which would improve the aesthetic character of the City. **(Less Than Significant Impact With Mitigation)**

4.21.2 Cumulative Impacts

When viewed in connection with the effects of past, current, and future projects, the proposed project, installation of a new LED digital billboard in an urban, industrial and office area of the City of Santa Clara, would not make a cumulatively considerable contribution to a cumulative environmental impact.

The LED lighting uses in the proposed billboard would meet Title 24 requirements for energy efficiency and would be dimmable to reflect ambient light conditions. The project, due to its size and utilization of energy efficient lighting, would not make a cumulatively considerable contribution to cumulative greenhouse gas emissions or result in an overall impact to local and regional levels of greenhouse gas emissions. The project would not interfere with the City's implementation of its Climate Action Plan or preclude the City or State from meeting emission reduction goals by the horizon year 2035. The project also would not make sizable contributions to air emissions, traffic, or noise. **(Less Than Significant Cumulative Impacts)**

4.21.3 Direct or Indirect Adverse Effects on Human Beings

Consistent with Section 15065(a)(4) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Under this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality, biological resources, cultural resources, and hazardous materials. Implementation of the standard measures and mitigation measures, and adherence to General Plan, the City Code, and State and Federal regulations described in these sections of the report, would avoid significant impacts. No other direct or indirect adverse effects on human beings have been identified. **(Less Than Significant Impact with Mitigation)**

SECTION 5.0 REFERENCES

Checklist Sources:

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SECTION 6.0 LEAD AGENCY AND CONSULTANTS

LEAD AGENCY

City of Santa Clara

Tiffany Vien, Assistant Planner

CONSULTANTS

Denise Duffy & Associates, Inc.

Environmental Consultants and Planners

Denise Duffy, Principal

Erin Harwayne, AICP, Senior Project Manager

Robyn Simpson, Assistant Planner/Word Processing

Troy Lawson, Assistant Planner/Graphics

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Appendix A

Pace Analytical Report

Pace Analytical®
National Center for Testing & Innovation

ANALYTICAL REPORT

August 21, 2020

Terracon - Sacramento, CA

Sample Delivery Group:	L1250854
Samples Received:	08/14/2020
Project Number:	ND205064
Description:	Santa Clara Billboard

Report To: Hoda Alinasabbaboli
50 Goldenland Ct
Suite 100
Sacramento, CA 95834

Entire Report Reviewed By: Brian Ford

Brian Ford
Project Manager

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CPT-1-GW L1250854-01 GW

Collected by: Marshall Carter
Collected date/time: 08/13/20 10:40
Received date/time: 08/14/20 09:30

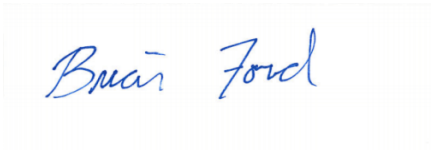
Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (GC/MS) by Method 8260B	WG1527703	1	08/18/20 16:47	08/18/20 16:47	ADM	Mt. Juliet, TN

CPT-1-15-16 L1250854-02 Solid

Collected by: Marshall Carter
Collected date/time: 08/13/20 11:30
Received date/time: 08/14/20 09:30

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Total Solids by Method 2540 G-2011	WG1528409	1	08/19/20 10:36	08/19/20 10:49	KBC	Mt. Juliet, TN
Volatile Organic Compounds (GC/MS) by Method 8260B	WG1528130	1	08/13/20 11:30	08/18/20 21:58	ACG	Mt. Juliet, TN

All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.



Brian Ford
Project Manager

The remainder of this page intentionally left blank, there are no detections to report for this SDG.

Volatile Organic Compounds (GC/MS) by Method 8260B

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis	Batch
	ug/l		ug/l	ug/l		date / time	
Acetone	U		11.3	25.0	1	08/18/2020 16:47	WG1527703
Acrylonitrile	U		0.671	5.00	1	08/18/2020 16:47	WG1527703
Benzene	U		0.0941	0.500	1	08/18/2020 16:47	WG1527703
Bromobenzene	U		0.118	0.500	1	08/18/2020 16:47	WG1527703
Bromodichloromethane	U		0.136	0.500	1	08/18/2020 16:47	WG1527703
Bromochloromethane	U		0.128	0.500	1	08/18/2020 16:47	WG1527703
Bromoform	U		0.129	0.500	1	08/18/2020 16:47	WG1527703
Bromomethane	U		0.605	2.50	1	08/18/2020 16:47	WG1527703
n-Butylbenzene	U		0.157	0.500	1	08/18/2020 16:47	WG1527703
sec-Butylbenzene	U		0.125	0.500	1	08/18/2020 16:47	WG1527703
tert-Butylbenzene	U		0.127	0.500	1	08/18/2020 16:47	WG1527703
Carbon disulfide	U		0.0962	0.500	1	08/18/2020 16:47	WG1527703
Carbon tetrachloride	U		0.128	0.500	1	08/18/2020 16:47	WG1527703
Chlorobenzene	U		0.117	0.500	1	08/18/2020 16:47	WG1527703
Chlorodibromomethane	U		0.140	0.500	1	08/18/2020 16:47	WG1527703
Chloroethane	U		0.192	2.50	1	08/18/2020 16:47	WG1527703
Chloroform	U		0.111	0.500	1	08/18/2020 16:47	WG1527703
Chloromethane	U		0.960	1.25	1	08/18/2020 16:47	WG1527703
2-Chlorotoluene	U		0.106	0.500	1	08/18/2020 16:47	WG1527703
4-Chlorotoluene	U		0.114	0.500	1	08/18/2020 16:47	WG1527703
1,2-Dibromo-3-Chloropropane	U		0.276	2.50	1	08/18/2020 16:47	WG1527703
1,2-Dibromoethane	U		0.126	0.500	1	08/18/2020 16:47	WG1527703
Dibromomethane	U		0.122	0.500	1	08/18/2020 16:47	WG1527703
1,2-Dichlorobenzene	U		0.107	0.500	1	08/18/2020 16:47	WG1527703
1,3-Dichlorobenzene	U		0.299	0.500	1	08/18/2020 16:47	WG1527703
1,4-Dichlorobenzene	U		0.120	0.500	1	08/18/2020 16:47	WG1527703
Dichlorodifluoromethane	U		0.374	2.50	1	08/18/2020 16:47	WG1527703
1,1-Dichloroethane	U		0.100	0.500	1	08/18/2020 16:47	WG1527703
1,2-Dichloroethane	U		0.0819	0.500	1	08/18/2020 16:47	WG1527703
1,1-Dichloroethene	U		0.188	0.500	1	08/18/2020 16:47	WG1527703
cis-1,2-Dichloroethene	U		0.126	0.500	1	08/18/2020 16:47	WG1527703
trans-1,2-Dichloroethene	U		0.149	0.500	1	08/18/2020 16:47	WG1527703
1,2-Dichloropropane	U		0.149	0.500	1	08/18/2020 16:47	WG1527703
1,1-Dichloropropene	U		0.142	0.500	1	08/18/2020 16:47	WG1527703
1,3-Dichloropropane	U		0.109	1.00	1	08/18/2020 16:47	WG1527703
cis-1,3-Dichloropropene	U		0.111	0.500	1	08/18/2020 16:47	WG1527703
trans-1,3-Dichloropropene	U		0.118	0.500	1	08/18/2020 16:47	WG1527703
trans-1,4-Dichloro-2-butene	U		0.467	5.00	1	08/18/2020 16:47	WG1527703
2,2-Dichloropropane	U		0.161	0.500	1	08/18/2020 16:47	WG1527703
Di-isopropyl ether	U		0.105	0.500	1	08/18/2020 16:47	WG1527703
Ethylbenzene	U		0.137	0.500	1	08/18/2020 16:47	WG1527703
Hexachloro-1,3-butadiene	U		0.337	1.00	1	08/18/2020 16:47	WG1527703
2-Hexanone	U		0.787	5.00	1	08/18/2020 16:47	WG1527703
Isopropylbenzene	U		0.105	0.500	1	08/18/2020 16:47	WG1527703
p-Isopropyltoluene	U		0.120	0.500	1	08/18/2020 16:47	WG1527703
2-Butanone (MEK)	U		1.19	5.00	1	08/18/2020 16:47	WG1527703
Methylene Chloride	U		0.430	2.50	1	08/18/2020 16:47	WG1527703
4-Methyl-2-pentanone (MIBK)	U		0.478	5.00	1	08/18/2020 16:47	WG1527703
Methyl tert-butyl ether	U		0.101	0.500	1	08/18/2020 16:47	WG1527703
Naphthalene	U		0.174	2.50	1	08/18/2020 16:47	WG1527703
n-Propylbenzene	U		0.0993	0.500	1	08/18/2020 16:47	WG1527703
Styrene	U		0.118	0.500	1	08/18/2020 16:47	WG1527703
1,1,1,2-Tetrachloroethane	U		0.147	0.500	1	08/18/2020 16:47	WG1527703
1,1,2,2-Tetrachloroethane	U		0.133	0.500	1	08/18/2020 16:47	WG1527703
1,1,2-Trichlorotrifluoroethane	U		0.180	0.500	1	08/18/2020 16:47	WG1527703
Tetrachloroethene	U		0.300	0.500	1	08/18/2020 16:47	WG1527703

Volatile Organic Compounds (GC/MS) by Method 8260B

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis	Batch
	ug/l		ug/l	ug/l		date / time	
Tetrahydrofuran	U		0.929	5.00	1	08/18/2020 16:47	WG1527703
Toluene	U		0.278	0.500	1	08/18/2020 16:47	WG1527703
1,2,3-Trichlorobenzene	U		0.164	0.500	1	08/18/2020 16:47	WG1527703
1,2,4-Trichlorobenzene	U		0.481	1.00	1	08/18/2020 16:47	WG1527703
1,1,1-Trichloroethane	U		0.149	0.500	1	08/18/2020 16:47	WG1527703
1,1,2-Trichloroethane	U		0.158	0.500	1	08/18/2020 16:47	WG1527703
Trichloroethene	U		0.190	0.500	1	08/18/2020 16:47	WG1527703
Trichlorofluoromethane	U		0.160	2.50	1	08/18/2020 16:47	WG1527703
1,2,3-Trichloropropane	U		0.237	2.50	1	08/18/2020 16:47	WG1527703
1,2,4-Trimethylbenzene	U		0.322	0.500	1	08/18/2020 16:47	WG1527703
1,3,5-Trimethylbenzene	U		0.104	0.500	1	08/18/2020 16:47	WG1527703
Vinyl chloride	U		0.234	0.500	1	08/18/2020 16:47	WG1527703
m&p-Xylenes	U		0.430	1.00	1	08/18/2020 16:47	WG1527703
o-Xylene	U		0.174	0.500	1	08/18/2020 16:47	WG1527703
Xylenes, Total	U		0.174	1.50	1	08/18/2020 16:47	WG1527703
(S) Toluene-d8	*101*			*80.0-120*		*08/18/2020 16:47*	WG1527703
(S) 4-Bromofluorobenzene	*95.6*			*77.0-126*		*08/18/2020 16:47*	WG1527703
(S) 1,2-Dichloroethane-d4	*106*			*70.0-130*		*08/18/2020 16:47*	WG1527703

Total Solids by Method 2540 G-2011

Analyte	Result	Qualifier	Dilution	Analysis	Batch
	%			date / time	
Total Solids	84.1		1	08/19/2020 10:49	WG1528409

Volatile Organic Compounds (GC/MS) by Method 8260B

Analyte	Result (dry)	Qualifier	MDL (dry)	RDL (dry)	Dilution	Analysis	Batch
	mg/kg		mg/kg	mg/kg		date / time	
Acetone	U		0.0533	0.0730	1	08/18/2020 21:58	WG1528130
Acrylonitrile	U		0.00527	0.0182	1	08/18/2020 21:58	WG1528130
Benzene	U		0.000681	0.00146	1	08/18/2020 21:58	WG1528130
Bromobenzene	U		0.00131	0.0182	1	08/18/2020 21:58	WG1528130
Bromochloromethane	U		0.000823	0.00730	1	08/18/2020 21:58	WG1528130
Bromodichloromethane	U		0.00106	0.00365	1	08/18/2020 21:58	WG1528130
Bromoform	U		0.00171	0.0365	1	08/18/2020 21:58	WG1528130
Bromomethane	U		0.00287	0.0182	1	08/18/2020 21:58	WG1528130
n-Butylbenzene	U		0.00766	0.0182	1	08/18/2020 21:58	WG1528130
sec-Butylbenzene	U		0.00420	0.0182	1	08/18/2020 21:58	WG1528130
tert-Butylbenzene	U		0.00285	0.00730	1	08/18/2020 21:58	WG1528130
Carbon tetrachloride	U		0.00131	0.00730	1	08/18/2020 21:58	WG1528130
Chlorobenzene	U		0.000306	0.00365	1	08/18/2020 21:58	WG1528130
Chlorodibromomethane	U		0.000893	0.00365	1	08/18/2020 21:58	WG1528130
Chloroethane	U		0.00248	0.00730	1	08/18/2020 21:58	WG1528130
Chloroform	U		0.00150	0.00365	1	08/18/2020 21:58	WG1528130
Chloromethane	U		0.00635	0.0182	1	08/18/2020 21:58	WG1528130
2-Chlorotoluene	U		0.00126	0.00365	1	08/18/2020 21:58	WG1528130
4-Chlorotoluene	U		0.000657	0.00730	1	08/18/2020 21:58	WG1528130
1,2-Dibromo-3-Chloropropane	U		0.00569	0.0365	1	08/18/2020 21:58	WG1528130
1,2-Dibromoethane	U		0.000946	0.00365	1	08/18/2020 21:58	WG1528130
Dibromomethane	U		0.00109	0.00730	1	08/18/2020 21:58	WG1528130
1,2-Dichlorobenzene	U	J4	0.000620	0.00730	1	08/18/2020 21:58	WG1528130
1,3-Dichlorobenzene	U		0.000875	0.00730	1	08/18/2020 21:58	WG1528130
1,4-Dichlorobenzene	U		0.00102	0.00730	1	08/18/2020 21:58	WG1528130
Dichlorodifluoromethane	U		0.00235	0.00365	1	08/18/2020 21:58	WG1528130
1,1-Dichloroethane	U		0.000716	0.00365	1	08/18/2020 21:58	WG1528130
1,2-Dichloroethane	U		0.000947	0.00365	1	08/18/2020 21:58	WG1528130
1,1-Dichloroethene	U		0.000884	0.00365	1	08/18/2020 21:58	WG1528130
cis-1,2-Dichloroethene	U		0.00107	0.00365	1	08/18/2020 21:58	WG1528130
trans-1,2-Dichloroethene	U		0.00152	0.00730	1	08/18/2020 21:58	WG1528130
1,2-Dichloropropane	U		0.00207	0.00730	1	08/18/2020 21:58	WG1528130
1,1-Dichloropropene	U		0.00118	0.00365	1	08/18/2020 21:58	WG1528130
1,3-Dichloropropane	U		0.000731	0.00730	1	08/18/2020 21:58	WG1528130
cis-1,3-Dichloropropene	U		0.00110	0.00365	1	08/18/2020 21:58	WG1528130
trans-1,3-Dichloropropene	U		0.00166	0.00730	1	08/18/2020 21:58	WG1528130
2,2-Dichloropropane	U		0.00201	0.00365	1	08/18/2020 21:58	WG1528130
Di-isopropyl ether	U		0.000598	0.00146	1	08/18/2020 21:58	WG1528130
Ethylbenzene	U		0.00108	0.00365	1	08/18/2020 21:58	WG1528130
2-Hexanone	U		0.00490	0.0365	1	08/18/2020 21:58	WG1528130
Hexachloro-1,3-butadiene	U		0.00875	0.0365	1	08/18/2020 21:58	WG1528130
Isopropylbenzene	U		0.000620	0.00365	1	08/18/2020 21:58	WG1528130
p-Isopropyltoluene	U		0.00372	0.00730	1	08/18/2020 21:58	WG1528130
2-Butanone (MEK)	U		0.0927	0.146	1	08/18/2020 21:58	WG1528130
Methylene Chloride	U		0.00969	0.0365	1	08/18/2020 21:58	WG1528130
4-Methyl-2-pentanone (MIBK)	U		0.00333	0.0365	1	08/18/2020 21:58	WG1528130
Methyl tert-butyl ether	U		0.000511	0.00146	1	08/18/2020 21:58	WG1528130
Naphthalene	U		0.00712	0.0182	1	08/18/2020 21:58	WG1528130
n-Propylbenzene	U		0.00139	0.00730	1	08/18/2020 21:58	WG1528130
Styrene	U		0.000334	0.0182	1	08/18/2020 21:58	WG1528130

Volatile Organic Compounds (GC/MS) by Method 8260B

Analyte	Result (dry) mg/kg	Qualifier	MDL (dry) mg/kg	RDL (dry) mg/kg	Dilution	Analysis date / time	Batch
1,1,1,2-Tetrachloroethane	U		0.00138	0.00365	1	08/18/2020 21:58	WG1528130
1,1,2,2-Tetrachloroethane	U		0.00101	0.00365	1	08/18/2020 21:58	WG1528130
1,1,2-Trichlorotrifluoroethane	U		0.00110	0.00365	1	08/18/2020 21:58	WG1528130
Tetrachloroethene	U		0.00131	0.00365	1	08/18/2020 21:58	WG1528130
Toluene	U		0.00190	0.00730	1	08/18/2020 21:58	WG1528130
1,2,3-Trichlorobenzene	U		0.0107	0.0182	1	08/18/2020 21:58	WG1528130
1,2,4-Trichlorobenzene	U		0.00642	0.0182	1	08/18/2020 21:58	WG1528130
1,1,1-Trichloroethane	U		0.00135	0.00365	1	08/18/2020 21:58	WG1528130
1,1,2-Trichloroethane	U		0.000871	0.00365	1	08/18/2020 21:58	WG1528130
Trichloroethene	U		0.000852	0.00146	1	08/18/2020 21:58	WG1528130
Tetrahydrofuran	U		0.00514	0.0182	1	08/18/2020 21:58	WG1528130
Trichlorofluoromethane	U		0.00121	0.00365	1	08/18/2020 21:58	WG1528130
1,2,3-Trichloropropane	U		0.00236	0.0182	1	08/18/2020 21:58	WG1528130
1,2,4-Trimethylbenzene	U		0.00231	0.00730	1	08/18/2020 21:58	WG1528130
1,3,5-Trimethylbenzene	U		0.00292	0.00730	1	08/18/2020 21:58	WG1528130
Vinyl chloride	U		0.00169	0.00365	1	08/18/2020 21:58	WG1528130
o-Xylene	U		0.00128	0.00365	1	08/18/2020 21:58	WG1528130
m&p-Xylene	U		0.00277	0.00584	1	08/18/2020 21:58	WG1528130
Xylenes, Total	U		0.00128	0.00948	1	08/18/2020 21:58	WG1528130
(S) Toluene-d8	*102*			*75.0-131*		*08/18/2020 21:58*	WG1528130
(S) 4-Bromofluorobenzene	*99.9*			*67.0-138*		*08/18/2020 21:58*	WG1528130
(S) 1,2-Dichloroethane-d4	*94.6*			*70.0-130*		*08/18/2020 21:58*	WG1528130

Method Blank (MB)

(MB) R3561740-1 08/19/20 10:49

Analyte	MB Result %	MB Qualifier	MB MDL %	MB RDL %
Total Solids	0.000			

L1250840-06 Original Sample (OS) • Duplicate (DUP)

(OS) L1250840-06 08/19/20 10:49 • (DUP) R3561740-3 08/19/20 10:49

Analyte	Original Result %	DUP Result %	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
Total Solids	85.0	84.0	1	1.22		10

Laboratory Control Sample (LCS)

(LCS) R3561740-2 08/19/20 10:49

Analyte	Spike Amount %	LCS Result %	LCS Rec. %	Rec. Limits %	LCS Qualifier
Total Solids	50.0	50.0	100	85.0-115	

Method Blank (MB)

(MB) R3561028-2 08/18/20 09:00

Analyte	MB Result ug/l	MB Qualifier	MB MDL ug/l	MB RDL ug/l
Acetone	U		11.3	25.0
Acrylonitrile	U		0.671	5.00
Benzene	U		0.0941	0.500
Bromobenzene	U		0.118	0.500
Bromodichloromethane	U		0.136	0.500
Bromochloromethane	U		0.128	0.500
Bromoform	U		0.129	0.500
Bromomethane	U		0.605	2.50
n-Butylbenzene	U		0.157	0.500
sec-Butylbenzene	U		0.125	0.500
tert-Butylbenzene	U		0.127	0.500
Carbon disulfide	U		0.0962	0.500
Carbon tetrachloride	U		0.128	0.500
Chlorobenzene	U		0.117	0.500
Chlorodibromomethane	U		0.140	0.500
Chloroethane	U		0.192	2.50
Chloroform	U		0.111	0.500
Chloromethane	U		0.960	1.25
2-Chlorotoluene	U		0.106	0.500
4-Chlorotoluene	U		0.114	0.500
1,2-Dibromo-3-Chloropropane	U		0.276	2.50
1,2-Dibromoethane	U		0.126	0.500
Dibromomethane	U		0.122	0.500
1,2-Dichlorobenzene	U		0.107	0.500
1,3-Dichlorobenzene	U		0.299	0.500
1,4-Dichlorobenzene	U		0.120	0.500
trans-1,4-Dichloro-2-butene	U		0.467	5.00
Dichlorodifluoromethane	U		0.374	2.50
1,1-Dichloroethane	U		0.100	0.500
1,2-Dichloroethane	U		0.0819	0.500
1,1-Dichloroethene	U		0.188	0.500
cis-1,2-Dichloroethene	U		0.126	0.500
trans-1,2-Dichloroethene	U		0.149	0.500
1,2-Dichloropropane	U		0.149	0.500
1,1-Dichloropropene	U		0.142	0.500
1,3-Dichloropropane	U		0.109	1.00
cis-1,3-Dichloropropene	U		0.111	0.500
trans-1,3-Dichloropropene	U		0.118	0.500
2,2-Dichloropropane	U		0.161	0.500
Di-isopropyl ether	U		0.105	0.500

Method Blank (MB)

(MB) R3561028-2 08/18/20 09:00

Analyte	MB Result ug/l	MB Qualifier	MB MDL ug/l	MB RDL ug/l
Ethylbenzene	U		0.137	0.500
Hexachloro-1,3-butadiene	U		0.337	1.00
2-Hexanone	U		0.787	5.00
Isopropylbenzene	U		0.105	0.500
p-Isopropyltoluene	U		0.120	0.500
2-Butanone (MEK)	U		1.19	5.00
Methylene Chloride	U		0.430	2.50
4-Methyl-2-pentanone (MIBK)	U		0.478	5.00
Methyl tert-butyl ether	U		0.101	0.500
Naphthalene	U		0.174	2.50
n-Propylbenzene	U		0.0993	0.500
Styrene	U		0.118	0.500
1,1,1,2-Tetrachloroethane	U		0.147	0.500
1,1,2,2-Tetrachloroethane	U		0.133	0.500
Tetrachloroethene	U		0.300	0.500
Tetrahydrofuran	U		0.929	5.00
Toluene	U		0.278	0.500
1,1,2-Trichlorotrifluoroethane	U		0.180	0.500
1,2,3-Trichlorobenzene	U		0.164	0.500
1,2,4-Trichlorobenzene	U		0.481	1.00
1,1,1-Trichloroethane	U		0.149	0.500
1,1,2-Trichloroethane	U		0.158	0.500
Trichloroethene	U		0.190	0.500
Trichlorofluoromethane	U		0.160	2.50
1,2,3-Trichloropropane	U		0.237	2.50
1,2,4-Trimethylbenzene	U		0.322	0.500
1,3,5-Trimethylbenzene	U		0.104	0.500
Vinyl chloride	U		0.234	0.500
Xylenes, Total	U		0.174	1.50
o-Xylene	U		0.174	0.500
m&p-Xylenes	U		0.430	1.00
(S) Toluene-d8	*103*			*80.0-120*
(S) 4-Bromofluorobenzene	*99.0*			*77.0-126*
(S) 1,2-Dichloroethane-d4	*105*			*70.0-130*

1 Cp
2 Tc
3 Ss
4 Cn
5 Ds
6 Sr
7 Qc
8 Gl
9 Al
10 Sc

Laboratory Control Sample (LCS)

(LCS) R3561028-1 08/18/20 07:55

Analyte	Spike Amount ug/l	LCS Result ug/l	LCS Rec. %	Rec. Limits %	LCS Qualifier
Acetone	25.0	31.8	127	19.0-160	
Acrylonitrile	25.0	27.9	112	55.0-149	
Benzene	5.00	4.89	97.8	70.0-123	
Bromobenzene	5.00	4.94	98.8	73.0-121	
Bromodichloromethane	5.00	5.15	103	75.0-120	
Bromochloromethane	5.00	5.27	105	76.0-122	
Bromoform	5.00	5.46	109	68.0-132	
Bromomethane	5.00	5.12	102	10.0-160	
n-Butylbenzene	5.00	5.24	105	73.0-125	
sec-Butylbenzene	5.00	5.21	104	75.0-125	
tert-Butylbenzene	5.00	5.21	104	76.0-124	
Carbon disulfide	5.00	4.70	94.0	61.0-128	
Carbon tetrachloride	5.00	4.88	97.6	68.0-126	
Chlorobenzene	5.00	4.90	98.0	80.0-121	
Chlorodibromomethane	5.00	5.58	112	77.0-125	
Chloroethane	5.00	5.28	106	47.0-150	
Chloroform	5.00	5.01	100	73.0-120	
Chloromethane	5.00	6.66	133	41.0-142	
2-Chlorotoluene	5.00	4.91	98.2	76.0-123	
4-Chlorotoluene	5.00	5.22	104	75.0-122	
1,2-Dibromo-3-Chloropropane	5.00	5.45	109	58.0-134	
1,2-Dibromoethane	5.00	5.55	111	80.0-122	
Dibromomethane	5.00	5.26	105	80.0-120	
1,2-Dichlorobenzene	5.00	5.51	110	79.0-121	
1,3-Dichlorobenzene	5.00	5.33	107	79.0-120	
1,4-Dichlorobenzene	5.00	5.00	100	79.0-120	
trans-1,4-Dichloro-2-butene	5.00	4.81	96.2	33.0-144	
Dichlorodifluoromethane	5.00	5.99	120	51.0-149	
1,1-Dichloroethane	5.00	5.02	100	70.0-126	
1,2-Dichloroethane	5.00	5.05	101	70.0-128	
1,1-Dichloroethene	5.00	4.77	95.4	71.0-124	
cis-1,2-Dichloroethene	5.00	5.03	101	73.0-120	
trans-1,2-Dichloroethene	5.00	4.82	96.4	73.0-120	
1,2-Dichloropropane	5.00	5.31	106	77.0-125	
1,1-Dichloropropene	5.00	4.91	98.2	74.0-126	
1,3-Dichloropropane	5.00	5.23	105	80.0-120	
cis-1,3-Dichloropropene	5.00	5.20	104	80.0-123	
trans-1,3-Dichloropropene	5.00	5.29	106	78.0-124	
2,2-Dichloropropane	5.00	5.32	106	58.0-130	
Di-isopropyl ether	5.00	5.13	103	58.0-138	

Laboratory Control Sample (LCS)

(LCS) R3561028-1 08/18/20 07:55

Analyte	Spike Amount ug/l	LCS Result ug/l	LCS Rec. %	Rec. Limits %	LCS Qualifier
Ethylbenzene	5.00	5.00	100	79.0-123	
Hexachloro-1,3-butadiene	5.00	5.51	110	54.0-138	
2-Hexanone	25.0	26.3	105	67.0-149	
Isopropylbenzene	5.00	5.26	105	76.0-127	
p-Isopropyltoluene	5.00	5.10	102	76.0-125	
2-Butanone (MEK)	25.0	27.6	110	44.0-160	
Methylene Chloride	5.00	5.16	103	67.0-120	
4-Methyl-2-pentanone (MIBK)	25.0	27.1	108	68.0-142	
Methyl tert-butyl ether	5.00	5.03	101	68.0-125	
Naphthalene	5.00	4.62	92.4	54.0-135	
n-Propylbenzene	5.00	4.94	98.8	77.0-124	
Styrene	5.00	5.04	101	73.0-130	
1,1,1,2-Tetrachloroethane	5.00	5.33	107	75.0-125	
1,1,2,2-Tetrachloroethane	5.00	5.34	107	65.0-130	
Tetrachloroethene	5.00	5.03	101	72.0-132	
Tetrahydrofuran	5.00	5.63	113	41.0-146	
Toluene	5.00	5.14	103	79.0-120	
1,1,2-Trichlorotrifluoroethane	5.00	4.88	97.6	69.0-132	
1,2,3-Trichlorobenzene	5.00	5.02	100	50.0-138	
1,2,4-Trichlorobenzene	5.00	5.36	107	57.0-137	
1,1,1-Trichloroethane	5.00	4.94	98.8	73.0-124	
1,1,2-Trichloroethane	5.00	5.28	106	80.0-120	
Trichloroethene	5.00	4.79	95.8	78.0-124	
Trichlorofluoromethane	5.00	4.68	93.6	59.0-147	
1,2,3-Trichloropropane	5.00	5.47	109	73.0-130	
1,2,4-Trimethylbenzene	5.00	5.36	107	76.0-121	
1,3,5-Trimethylbenzene	5.00	5.09	102	76.0-122	
Vinyl chloride	5.00	5.09	102	67.0-131	
Xylenes, Total	15.0	15.4	103	79.0-123	
o-Xylene	5.00	5.07	101	80.0-122	
m&p-Xylenes	10.0	10.3	103	80.0-122	
(S) Toluene-d8			*101*	*80.0-120*	
(S) 4-Bromofluorobenzene			*101*	*77.0-126*	
(S) 1,2-Dichloroethane-d4			*102*	*70.0-130*	

1 Cp
2 Tc
3 Ss
4 Cn
5 Ds
6 Sr
7 Qc
8 Gl
9 Al
10 Sc

L1249199-55 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1249199-55 08/18/20 12:49 • (MS) R3561028-3 08/18/20 18:57 • (MSD) R3561028-4 08/18/20 19:18

Analyte	Spike Amount ug/l	Original Result ug/l	MS Result ug/l	MSD Result ug/l	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Acetone	25.0	U	34.3	38.9	137	156	1	10.0-160			12.6	35
Acrylonitrile	25.0	U	30.1	33.2	120	133	1	21.0-160			9.79	32
Benzene	5.00	U	4.41	5.87	88.2	117	1	17.0-158		J3	28.4	27
Bromobenzene	5.00	U	4.54	5.61	90.8	112	1	30.0-149			21.1	28
Bromodichloromethane	5.00	U	4.75	6.03	95.0	121	1	31.0-150			23.7	27
Bromoform	5.00	U	5.23	6.20	105	124	1	29.0-150			17.0	29
Bromomethane	5.00	U	4.79	6.54	95.8	131	1	10.0-160			30.9	38
n-Butylbenzene	5.00	U	4.73	6.07	94.6	121	1	31.0-150			24.8	30
sec-Butylbenzene	5.00	U	4.74	6.19	94.8	124	1	33.0-155			26.5	29
tert-Butylbenzene	5.00	U	4.61	6.13	92.2	123	1	34.0-153		J3	28.3	28
Carbon disulfide	5.00	U	4.49	6.24	89.8	125	1	10.0-156		J3	32.6	28
Carbon tetrachloride	5.00	U	4.64	6.46	92.8	129	1	23.0-159		J3	32.8	28
Chlorobenzene	5.00	U	4.41	5.58	88.2	112	1	33.0-152			23.4	27
Chlorodibromomethane	5.00	U	5.19	6.40	104	128	1	37.0-149			20.9	27
Chloroethane	5.00	U	5.40	7.15	108	143	1	10.0-160			27.9	30
Chloroform	5.00	0.770	5.50	6.86	94.6	122	1	29.0-154			22.0	28
Chloromethane	5.00	U	7.33	9.61	147	192	1	10.0-160		J5	26.9	29
2-Chlorotoluene	5.00	U	4.41	5.62	88.2	112	1	32.0-153			24.1	28
4-Chlorotoluene	5.00	U	4.75	5.86	95.0	117	1	32.0-150			20.9	28
1,2-Dibromo-3-Chloropropane	5.00	U	5.86	6.33	117	127	1	22.0-151			7.71	34
1,2-Dibromoethane	5.00	U	5.20	6.20	104	124	1	34.0-147			17.5	27
Dibromomethane	5.00	U	4.81	5.93	96.2	119	1	30.0-151			20.9	27
1,2-Dichlorobenzene	5.00	U	5.06	6.21	101	124	1	34.0-149			20.4	28
1,3-Dichlorobenzene	5.00	U	4.80	6.00	96.0	120	1	36.0-146			22.2	27
1,4-Dichlorobenzene	5.00	U	4.63	5.72	92.6	114	1	35.0-142			21.1	27
Dichlorodifluoromethane	5.00	U	5.65	8.24	113	165	1	10.0-160		J3 J5	37.3	29
1,1-Dichloroethane	5.00	U	4.69	6.12	93.8	122	1	25.0-158			26.5	27
1,2-Dichloroethane	5.00	U	4.85	5.87	97.0	117	1	29.0-151			19.0	27
1,1-Dichloroethene	5.00	U	4.81	6.22	96.2	124	1	11.0-160			25.6	29
cis-1,2-Dichloroethene	5.00	2.12	6.70	7.95	91.6	117	1	10.0-160			17.1	27
trans-1,2-Dichloroethene	5.00	U	4.59	5.99	91.8	120	1	17.0-153			26.5	27
1,2-Dichloropropane	5.00	U	4.63	6.10	92.6	122	1	30.0-156		J3	27.4	27
1,1-Dichloropropene	5.00	U	4.53	6.29	90.6	126	1	25.0-158		J3	32.5	27
Bromochloromethane	5.00	U	4.79	5.88	95.8	118	1	38.0-142			20.4	26
1,3-Dichloropropane	5.00	U	4.81	5.89	96.2	118	1	38.0-147			20.2	27
cis-1,3-Dichloropropene	5.00	U	4.39	5.61	87.8	112	1	34.0-149			24.4	28
trans-1,3-Dichloropropene	5.00	U	4.96	6.09	99.2	122	1	32.0-149			20.5	28
2,2-Dichloropropane	5.00	U	4.41	5.83	88.2	117	1	24.0-152			27.7	29
Di-isopropyl ether	5.00	U	4.99	6.24	99.8	125	1	21.0-160			22.3	28
Ethylbenzene	5.00	U	4.61	5.99	92.2	120	1	30.0-155			26.0	27

L1249199-55 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1249199-55 08/18/20 12:49 • (MS) R3561028-3 08/18/20 18:57 • (MSD) R3561028-4 08/18/20 19:18

Analyte	Spike Amount ug/l	Original Result ug/l	MS Result ug/l	MSD Result ug/l	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Hexachloro-1,3-butadiene	5.00	U	4.70	6.24	94.0	125	1	20.0-154			28.2	34
2-Hexanone	25.0	U	28.9	32.6	116	130	1	21.0-160			12.0	29
Isopropylbenzene	5.00	U	4.80	6.27	96.0	125	1	28.0-157			26.6	27
p-Isopropyltoluene	5.00	U	4.57	5.96	91.4	119	1	30.0-154			26.4	29
2-Butanone (MEK)	25.0	U	30.3	34.5	121	138	1	10.0-160			13.0	32
Methylene Chloride	5.00	U	4.48	5.96	89.6	119	1	23.0-144		J3	28.4	28
4-Methyl-2-pentanone (MIBK)	25.0	U	30.1	33.4	120	134	1	29.0-160			10.4	29
Methyl tert-butyl ether	5.00	U	5.19	6.17	104	123	1	28.0-150			17.3	29
Naphthalene	5.00	U	5.08	6.24	102	125	1	12.0-156			20.5	35
n-Propylbenzene	5.00	U	4.48	5.71	89.6	114	1	31.0-154			24.1	28
Styrene	5.00	U	4.70	5.91	94.0	118	1	33.0-155			22.8	28
1,1,1,2-Tetrachloroethane	5.00	U	4.83	5.98	96.6	120	1	36.0-151			21.3	29
1,1,2,2-Tetrachloroethane	5.00	U	5.55	6.18	111	124	1	33.0-150			10.7	28
Tetrachloroethene	5.00	35.6	39.3	40.9	74.0	106	1	10.0-160			3.99	27
m&p-Xylenes	10.0	U	9.28	12.2	92.8	122	1	43.0-146		J3	27.2	26
Toluene	5.00	U	4.53	5.93	90.6	119	1	26.0-154			26.8	28
1,1,2-Trichlorotrifluoroethane	5.00	U	4.95	6.75	99.0	135	1	23.0-160		J3	30.8	30
1,2,3-Trichlorobenzene	5.00	U	5.30	7.09	106	142	1	17.0-150			28.9	36
1,2,4-Trichlorobenzene	5.00	U	4.86	6.27	97.2	125	1	24.0-150			25.3	33
1,1,1-Trichloroethane	5.00	U	4.68	6.37	93.6	127	1	23.0-160		J3	30.6	28
1,1,2-Trichloroethane	5.00	U	5.08	5.85	102	117	1	35.0-147			14.1	27
Trichloroethene	5.00	1.15	5.42	6.79	85.4	113	1	10.0-160			22.4	25
Trichlorofluoromethane	5.00	U	5.06	7.75	101	155	1	17.0-160		J3	42.0	31
1,2,3-Trichloropropane	5.00	U	5.46	6.15	109	123	1	34.0-151			11.9	29
1,2,4-Trimethylbenzene	5.00	U	4.85	6.15	97.0	123	1	26.0-154			23.6	27
1,3,5-Trimethylbenzene	5.00	U	4.58	5.98	91.6	120	1	28.0-153			26.5	27
o-Xylene	5.00	U	4.54	5.80	90.8	116	1	45.0-144			24.4	26
Vinyl chloride	5.00	U	5.62	7.82	112	156	1	10.0-160		J3	32.7	27
Xylenes, Total	15.0	U	13.8	18.0	92.0	120	1	29.0-154			26.4	28
Tetrahydrofuran	5.00	U	5.66	6.75	113	135	1	12.0-156			17.6	27
trans-1,4-Dichloro-2-butene	5.00	U	4.69	6.26	93.8	125	1	10.0-157			28.7	37
(S) Toluene-d8					*98.1*	*97.6*		*80.0-120*				
(S) 4-Bromofluorobenzene					*101*	*100*		*77.0-126*				
(S) 1,2-Dichloroethane-d4					*104*	*105*		*70.0-130*				

Method Blank (MB)

(MB) R3561482-2 08/18/20 14:58

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Acetone	U		0.0365	0.0500
Acrylonitrile	U		0.00361	0.0125
Benzene	U		0.000467	0.00100
Bromobenzene	U		0.000900	0.0125
Bromodichloromethane	U		0.000725	0.00250
Bromochloromethane	U		0.000564	0.00500
Bromoform	U		0.00117	0.0250
Bromomethane	U		0.00197	0.0125
n-Butylbenzene	U		0.00525	0.0125
sec-Butylbenzene	U		0.00288	0.0125
tert-Butylbenzene	U		0.00195	0.00500
Carbon tetrachloride	U		0.000898	0.00500
Chlorobenzene	U		0.000210	0.00250
Chlorodibromomethane	U		0.000612	0.00250
Chloroethane	U		0.00170	0.00500
Chloroform	U		0.00103	0.00250
Chloromethane	U		0.00435	0.0125
2-Chlorotoluene	U		0.000865	0.00250
4-Chlorotoluene	U		0.000450	0.00500
1,2-Dibromo-3-Chloropropane	U		0.00390	0.0250
1,2-Dibromoethane	U		0.000648	0.00250
Dibromomethane	U		0.000750	0.00500
1,2-Dichlorobenzene	U		0.000425	0.00500
1,3-Dichlorobenzene	U		0.000600	0.00500
1,4-Dichlorobenzene	U		0.000700	0.00500
Dichlorodifluoromethane	U		0.00161	0.00250
1,1-Dichloroethane	U		0.000491	0.00250
1,2-Dichloroethane	U		0.000649	0.00250
1,1-Dichloroethene	U		0.000606	0.00250
cis-1,2-Dichloroethene	U		0.000734	0.00250
trans-1,2-Dichloroethene	U		0.00104	0.00500
1,2-Dichloropropane	U		0.00142	0.00500
1,1-Dichloropropene	U		0.000809	0.00250
1,3-Dichloropropane	U		0.000501	0.00500
cis-1,3-Dichloropropene	U		0.000757	0.00250
trans-1,3-Dichloropropene	U		0.00114	0.00500
2,2-Dichloropropane	U		0.00138	0.00250
Di-isopropyl ether	U		0.000410	0.00100
Ethylbenzene	U		0.000737	0.00250
Hexachloro-1,3-butadiene	0.0124	J	0.00600	0.0250

Method Blank (MB)

(MB) R3561482-2 08/18/20 14:58

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
2-Hexanone	U		0.00336	0.0250
Isopropylbenzene	U		0.000425	0.00250
p-Isopropyltoluene	U		0.00255	0.00500
2-Butanone (MEK)	U		0.0635	0.100
Methylene Chloride	0.00825	J	0.00664	0.0250
4-Methyl-2-pentanone (MIBK)	U		0.00228	0.0250
Methyl tert-butyl ether	U		0.000350	0.00100
Naphthalene	U		0.00488	0.0125
n-Propylbenzene	U		0.000950	0.00500
Styrene	U		0.000229	0.0125
1,1,1,2-Tetrachloroethane	U		0.000948	0.00250
1,1,2,2-Tetrachloroethane	U		0.000695	0.00250
Tetrachloroethene	U		0.000896	0.00250
Tetrahydrofuran	U		0.00352	0.0125
Toluene	U		0.00130	0.00500
1,1,2-Trichlorotrifluoroethane	U		0.000754	0.00250
1,2,3-Trichlorobenzene	U		0.00733	0.0125
1,2,4-Trichlorobenzene	U		0.00440	0.0125
1,1,1-Trichloroethane	U		0.000923	0.00250
1,1,2-Trichloroethane	U		0.000597	0.00250
Trichloroethene	U		0.000584	0.00100
Trichlorofluoromethane	U		0.000827	0.00250
1,2,3-Trichloropropane	U		0.00162	0.0125
1,2,4-Trimethylbenzene	U		0.00158	0.00500
1,3,5-Trimethylbenzene	U		0.00200	0.00500
Vinyl chloride	U		0.00116	0.00250
Xylenes, Total	U		0.000880	0.00650
o-Xylene	U		0.000880	0.00250
m&p-Xylenes	U		0.00190	0.00400
(S) Toluene-d8	*103*			*75.0-131*
(S) 4-Bromofluorobenzene	*96.3*			*67.0-138*
(S) 1,2-Dichloroethane-d4	*94.1*			*70.0-130*

Laboratory Control Sample (LCS)

(LCS) R3561482-1 08/18/20 13:56

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
Acetone	0.625	0.636	102	10.0-160	
Acrylonitrile	0.625	0.629	101	45.0-153	
Benzene	0.125	0.136	109	70.0-123	
Bromobenzene	0.125	0.141	113	73.0-121	
Bromodichloromethane	0.125	0.143	114	73.0-121	
Bromochloromethane	0.125	0.122	97.6	77.0-128	
Bromoform	0.125	0.125	100	64.0-132	
Bromomethane	0.125	0.120	96.0	56.0-147	
n-Butylbenzene	0.125	0.131	105	68.0-135	
sec-Butylbenzene	0.125	0.127	102	74.0-130	
tert-Butylbenzene	0.125	0.121	96.8	75.0-127	
Carbon tetrachloride	0.125	0.121	96.8	66.0-128	
Chlorobenzene	0.125	0.123	98.4	76.0-128	
Chlorodibromomethane	0.125	0.155	124	74.0-127	
Chloroethane	0.125	0.124	99.2	61.0-134	
Chloroform	0.125	0.130	104	72.0-123	
Chloromethane	0.125	0.127	102	51.0-138	
2-Chlorotoluene	0.125	0.124	99.2	75.0-124	
4-Chlorotoluene	0.125	0.121	96.8	75.0-124	
1,2-Dibromo-3-Chloropropane	0.125	0.122	97.6	59.0-130	
1,2-Dibromoethane	0.125	0.149	119	74.0-128	
Dibromomethane	0.125	0.134	107	75.0-122	
1,2-Dichlorobenzene	0.125	0.157	126	76.0-124	J4
1,3-Dichlorobenzene	0.125	0.138	110	76.0-125	
1,4-Dichlorobenzene	0.125	0.113	90.4	77.0-121	
Dichlorodifluoromethane	0.125	0.103	82.4	43.0-156	
1,1-Dichloroethane	0.125	0.120	96.0	70.0-127	
1,2-Dichloroethane	0.125	0.130	104	65.0-131	
1,1-Dichloroethene	0.125	0.114	91.2	65.0-131	
cis-1,2-Dichloroethene	0.125	0.138	110	73.0-125	
trans-1,2-Dichloroethene	0.125	0.126	101	71.0-125	
1,2-Dichloropropane	0.125	0.118	94.4	74.0-125	
1,1-Dichloropropene	0.125	0.146	117	73.0-125	
1,3-Dichloropropane	0.125	0.123	98.4	80.0-125	
cis-1,3-Dichloropropene	0.125	0.118	94.4	76.0-127	
trans-1,3-Dichloropropene	0.125	0.127	102	73.0-127	
2,2-Dichloropropane	0.125	0.115	92.0	59.0-135	
Di-isopropyl ether	0.125	0.130	104	60.0-136	
Ethylbenzene	0.125	0.139	111	74.0-126	
Hexachloro-1,3-butadiene	0.125	0.140	112	57.0-150	

Laboratory Control Sample (LCS)

(LCS) R3561482-1 08/18/20 13:56

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
2-Hexanone	0.625	0.772	124	54.0-147	
Isopropylbenzene	0.125	0.121	96.8	72.0-127	
p-Isopropyltoluene	0.125	0.135	108	72.0-133	
2-Butanone (MEK)	0.625	0.654	105	30.0-160	
Methylene Chloride	0.125	0.113	90.4	68.0-123	
4-Methyl-2-pentanone (MIBK)	0.625	0.689	110	56.0-143	
Methyl tert-butyl ether	0.125	0.132	106	66.0-132	
Naphthalene	0.125	0.0908	72.6	59.0-130	
n-Propylbenzene	0.125	0.110	88.0	74.0-126	
Styrene	0.125	0.145	116	72.0-127	
1,1,1,2-Tetrachloroethane	0.125	0.122	97.6	74.0-129	
1,1,2,2-Tetrachloroethane	0.125	0.130	104	68.0-128	
Tetrachloroethene	0.125	0.126	101	70.0-136	
Tetrahydrofuran	0.125	0.142	114	37.0-146	
Toluene	0.125	0.127	102	75.0-121	
1,1,2-Trichlorotrifluoroethane	0.125	0.119	95.2	61.0-139	
1,2,3-Trichlorobenzene	0.125	0.118	94.4	59.0-139	
1,2,4-Trichlorobenzene	0.125	0.125	100	62.0-137	
1,1,1-Trichloroethane	0.125	0.109	87.2	69.0-126	
1,1,2-Trichloroethane	0.125	0.123	98.4	78.0-123	
Trichloroethene	0.125	0.113	90.4	76.0-126	
Trichlorofluoromethane	0.125	0.145	116	61.0-142	
1,2,3-Trichloropropane	0.125	0.131	105	67.0-129	
1,2,4-Trimethylbenzene	0.125	0.144	115	70.0-126	
1,3,5-Trimethylbenzene	0.125	0.120	96.0	73.0-127	
Vinyl chloride	0.125	0.117	93.6	63.0-134	
Xylenes, Total	0.375	0.418	111	72.0-127	
o-Xylene	0.125	0.135	108	79.0-124	
m&p-Xylenes	0.250	0.283	113	76.0-126	
(S) Toluene-d8			*101*	*75.0-131*	
(S) 4-Bromofluorobenzene			*106*	*67.0-138*	
(S) 1,2-Dichloroethane-d4			*99.7*	*70.0-130*	

Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

Results Disclaimer - Information that may be provided by the customer, and contained within this report, include Permit Limits, Project Name, Sample ID, Sample Matrix, Sample Preservation, Field Blanks, Field Spikes, Field Duplicates, On-Site Data, Sampling Collection Dates/Times, and Sampling Location. Results relate to the accuracy of this information provided, and as the samples are received.

Abbreviations and Definitions

(dry)	Results are reported based on the dry weight of the sample. [this will only be present on a dry report basis for soils].
MDL	Method Detection Limit.
MDL (dry)	Method Detection Limit.
RDL	Reported Detection Limit.
RDL (dry)	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
(S)	Surrogate (Surrogate Standard) - Analytes added to every blank, sample, Laboratory Control Sample/Duplicate and Matrix Spike/Duplicate; used to evaluate analytical efficiency by measuring recovery. Surrogates are not expected to be detected in all environmental media.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state “ND” (Not Detected) or “BDL” (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

Qualifier	Description
J	The identification of the analyte is acceptable; the reported value is an estimate.
J3	The associated batch QC was outside the established quality control range for precision.
J4	The associated batch QC was outside the established quality control range for accuracy.
J5	The sample matrix interfered with the ability to make any accurate determination; spike value is high.

Pace National is the only environmental laboratory accredited/certified to support your work nationwide from one location. One phone call, one point of contact, one laboratory. No other lab is as accessible or prepared to handle your needs throughout the country. Our capacity and capability from our single location laboratory is comparable to the collective totals of the network laboratories in our industry. The most significant benefit to our one location design is the design of our laboratory campus. The model is conducive to accelerated productivity, decreasing turn-around time, and preventing cross contamination, thus protecting sample integrity. Our focus on premium quality and prompt service allows us to be YOUR LAB OF CHOICE.
* Not all certifications held by the laboratory are applicable to the results reported in the attached report.
* Accreditation is only applicable to the test methods specified on each scope of accreditation held by Pace National.

State Accreditations

Alabama	40660	Nebraska	NE-OS-15-05
Alaska	17-026	Nevada	TN-03-2002-34
Arizona	AZ0612	New Hampshire	2975
Arkansas	88-0469	New Jersey–NELAP	TN002
California	2932	New Mexico [1]	n/a
Colorado	TN00003	New York	11742
Connecticut	PH-0197	North Carolina	Env375
Florida	E87487	North Carolina [1]	DW21704
Georgia	NELAP	North Carolina [3]	41
Georgia [1]	923	North Dakota	R-140
Idaho	TN00003	Ohio–VAP	CL0069
Illinois	200008	Oklahoma	9915
Indiana	C-TN-01	Oregon	TN200002
Iowa	364	Pennsylvania	68-02979
Kansas	E-10277	Rhode Island	LAO00356
Kentucky [1 6]	90010	South Carolina	84004
Kentucky [2]	16	South Dakota	n/a
Louisiana	AI30792	Tennessee [1 4]	2006
Louisiana [1]	LA180010	Texas	T104704245-18-15
Maine	TN0002	Texas [5]	LAB0152
Maryland	324	Utah	TN00003
Massachusetts	M-TN003	Vermont	VT2006
Michigan	9958	Virginia	460132
Minnesota	047-999-395	Washington	C847
Mississippi	TN00003	West Virginia	233
Missouri	340	Wisconsin	9980939910
Montana	CERT0086	Wyoming	A2LA

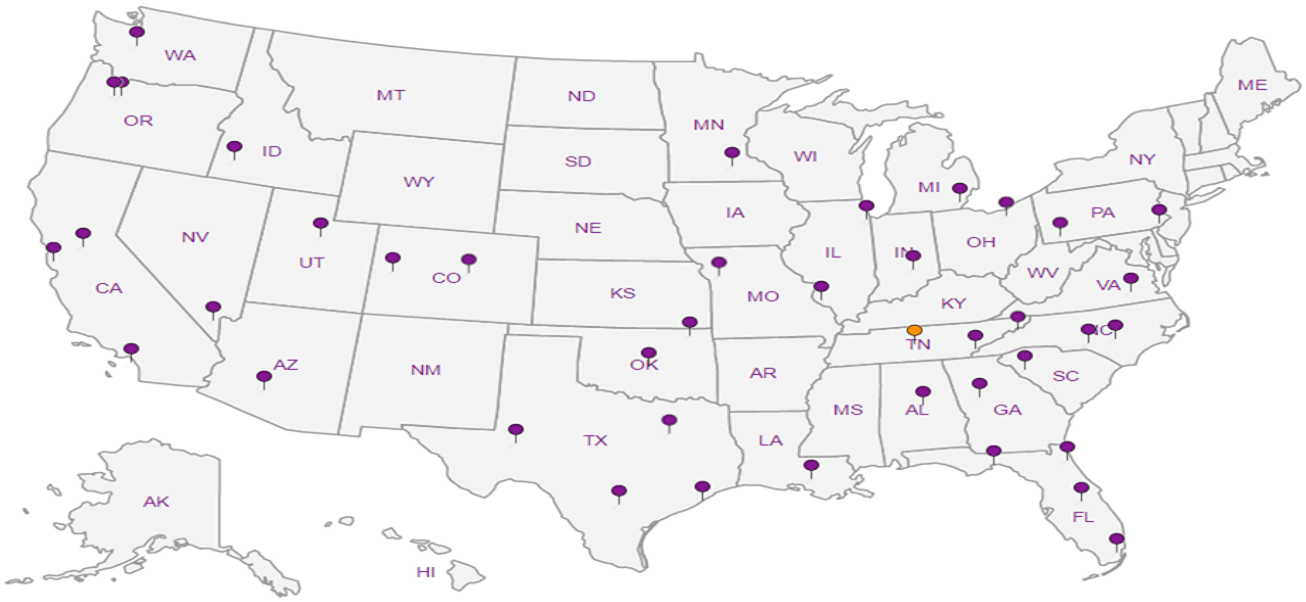
Third Party Federal Accreditations

A2LA – ISO 17025	1461.01	AIHA-LAP,LLC EMLAP	100789
A2LA – ISO 17025 [5]	1461.02	DOD	1461.01
Canada	1461.01	USDA	P330-15-00234
EPA–Crypto	TN00003		

[1] Drinking Water [2] Underground Storage Tanks [3] Aquatic Toxicity [4] Chemical/Microbiological [5] Mold [6] Wastewater n/a Accreditation not applicable

Our Locations

Pace National has sixty-four client support centers that provide sample pickup and/or the delivery of sampling supplies. If you would like assistance from one of our support offices, please contact our main office. Pace National performs all testing at our central laboratory.



Appendix B

FAA Determination Letter

Mail Processing Center
Federal Aviation Administration
Southwest Regional Office
Obstruction Evaluation Group
10101 Hillwood Parkway
Fort Worth, TX 76177

Aeronautical Study No.
2021-AWP-3159-OE
Prior Study No.
2019-AWP-1623-OE

Issued Date: 07/06/2021

Jeff
Outfront Media
1695 Eastshore Hwy
Berkeley, CA 94710

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Billboard Public Storage Update
Location:	Santa Clara, CA
Latitude:	37-22-39.89N NAD 83
Longitude:	121-56-41.96W
Heights:	24 feet site elevation (SE)
	60 feet above ground level (AGL)
	84 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities. Therefore, pursuant to the authority delegated to me, it is hereby determined that the structure would not be a hazard to air navigation provided the following condition(s) is(are) met:

As a condition to this Determination, the structure is to be marked/lighted in accordance with FAA Advisory circular 70/7460-1 M, Obstruction Marking and Lighting, red lights-Chapters 4,5(Red),&15.

Any failure or malfunction that lasts more than thirty (30) minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867 so a Notice to Airmen (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or:

__X__ At least 10 days prior to start of construction (7460-2, Part 1)
__X__ Within 5 days after the construction reaches its greatest height (7460-2, Part 2)

See attachment for additional condition(s) or information.

This determination expires on 01/06/2023 unless:

(a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
(b) extended, revised, or terminated by the issuing office.
(c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is subject to review if an interested party files a petition that is received by the FAA on or before August 05, 2021. In the event a petition for review is filed, it must contain a full statement of the basis upon which it is made and be submitted to the Manager of the Rules and Regulations Group. Petitions can be submitted via mail to Federal Aviation Administration, 800 Independence Ave, SW, Washington, DC 20591, via email at OEPetitions@faa.gov, or via facsimile (202) 267-9328.

This determination becomes final on August 15, 2021 unless a petition is timely filed. In which case, this determination will not become final pending disposition of the petition. Interested parties will be notified of the grant of any review. For any questions regarding your petition, please contact Rules and Regulations Group via telephone – 202-267-8783.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, effective 21 Nov 2007, will void this determination. Any future construction or alteration, including increase to heights, power or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

If construction or alteration is dismantled or destroyed, you must submit notice to the FAA within 5 days after the construction or alteration is dismantled or destroyed.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

This aeronautical study considered and analyzed the impact on existing and proposed arrival, departure, and en route procedures for aircraft operating under both visual flight rules and instrument flight rules; the impact on all existing and planned public-use airports, military airports and aeronautical facilities; and the cumulative impact resulting from the studied structure when combined with the impact of other existing or proposed

structures. The study disclosed that the described structure would have no substantial adverse effect on air navigation.

An account of the study findings, aeronautical objections received by the FAA during the study (if any), and the basis for the FAA's decision in this matter can be found on the following page(s).

If we can be of further assistance, please contact Daniel Shoemaker, at (206) 231-2989, or dan.shoemaker@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2021-AWP-3159-OE.

Signature Control No: 472876403-487090766 (DNH)
Steve Phillips
Manager, Obstruction Evaluation Group

Attachment(s)
Additional Information
Map(s)

Aeronautical Study Number 2021-AWP-3159-OE

Abbreviations

AGL - above ground level	AMSL - mean sea level	RWY - runway
VFR - visual flight rules	IFR - instrument flight rules	nm - nautical mile

Part 77 - Title 14 Code of Federal Regulations (CFR) Part 77, Objects Affecting Navigable Airspace

1. LOCATION OF PROPOSED CONSTRUCTION

This proposal is for a 60-foot AGL (84-foot AMSL) billboard, to be located approximately 1702 feet northwest of the RWY 12R threshold, and approximately 2990 feet northwest of the Runway 12R displaced threshold, at Norman Y. Mineta San Jose International Airport (SJC) in Fresno, CA. The SJC airport elevation is 62 feet AMSL.

2. OBSTRUCTION STANDARDS EXCEEDED

The structure is identified as an obstruction under the following Part 77 standards:

a. Section 77.17.(a)(3): A height within a terminal obstacle clearance area, including an initial approach segment, a departure area, and a circling approach area, which would result in the vertical distance between any point on the object and an established minimum instrument flight altitude within that area or segment to be less than the required obstacle clearance. This proposed billboard would have the following effects on IFR operations at SJC:

1) RWY 30L: Penetrates the 40:1 instrument departure slope in the initial climb area (ICA) by four feet, requiring a TAKE-OFF MINIMUMS AND (OBSTACLE) DEPARTURE PROCEDURE, NOTE: RWY 30L, billboard 1675 feet from departure end of runway, 307 feet right of centerline, 60 feet AGL, 84 feet AMSL. However, it would not increase the minimum weather requirements or the minimum required climb gradient for the departure procedure.

2) RWY 30R: Penetrates the 40:1 instrument departure slope in the initial climb area (ICA) by five feet, requiring a TAKE-OFF MINIMUMS AND (OBSTACLE) DEPARTURE PROCEDURE, NOTE: RWY 30R, billboard 1675 feet from departure end of runway, 392 feet left of centerline, 60 feet AGL, 84 feet AMSL. However, it would not increase the minimum weather requirements or the minimum required climb gradient for the departure procedure.

b. Section 77.19(d): The approach surface area designated under 77.19 to protect aircraft during the final approach phase of flight. The proposed billboard would exceed the SJC RWY 12R approach surface by 17 feet, and the SJC RWY 12L approach surface by three feet.

3. EFFECT ON AERONAUTICAL OPERATIONS

a. The impact on arrival, departure, and en route procedures for aircraft operating under VFR: The proposed billboard would exceed the SJC RWY 12R Part 77 approach surface area by 17 feet and the SJC RWY 12L approach surface by three feet. It would not exceed the SJC visual traffic pattern protected airspace, however.

b. The impact on arrival, departure, and en route procedures for aircraft operating under IFR: The proposed billboard would penetrate the SJC RWY 30L 40:1 instrument departure slope in the ICA by four feet and the SJC RWY 30R 40:1 instrument departure surface in the ICA by five feet, requiring a notes in the TAKE-OFF MINIMUMS AND (OBSTACLE) DEPARTURE PROCEDUREs to alert pilots to its presence.

c. The impact on all planned public-use airports and aeronautical facilities: None.

d. The cumulative impact resulting from the proposed construction or alteration of a structure when combined with the impact of other existing or proposed structures: None.

4. CIRCULATION AND COMMENTS RECEIVED

The proposal was circularized for public comment on 21 May 2021. The public comment period ended on 27 June 2021, and no responses were received as of that date.

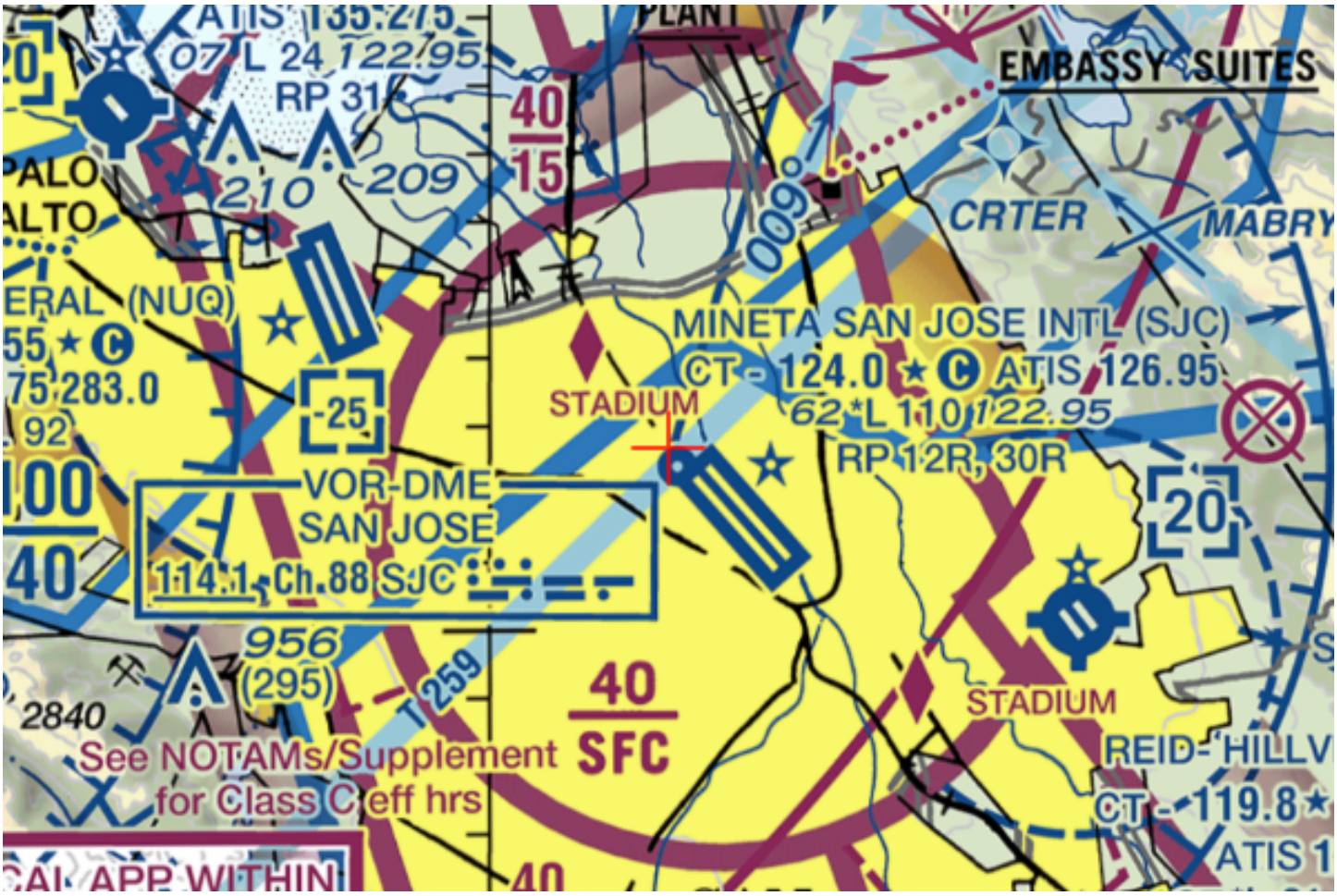
5. DETERMINATION - NO HAZARD TO AIR NAVIGATION

It is determined that the proposed construction would not have a substantial adverse effect on the safe and efficient use of navigable airspace by aircraft.

6. BASIS FOR DECISION

Part 77 establishes standards for determining obstructions to air navigation. A structure that exceeds one or more of these standards is presumed to be a hazard to air navigation unless the obstruction evaluation study determines otherwise. The fact that a proposed structure exceeds a Part 77 surface does not automatically make it a hazard. While the proposed billboard would penetrate the SJC RWY 12R Part 77 approach surface by 17 feet and the SJC RWY 12L Part 77 approach surface by three feet, it would not penetrate the visual traffic pattern protected airspace, and would not interfere with any radio or visual navigational or landing aids. It would penetrate the RWY 30R 40:1 instrument departure surface by four feet and the RWY 30L 40:1 instrument departure surface by five feet, but these penetrations would not require increases to the departure procedures' minimum weather requirements or minimum climb gradients, and would require only notes in the respective runways' TAKE-OFF MINIMUMS AND (OBSTACLE) DEPARTURE PROCEDURES.

TOPO Map for ASN 2021-AWP-3159-OE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