

**DETERMINATION OF ELIGIBILITY TO UTILIZE STATUTORY EXEMPTION TO THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT FOR THE
TASMAN EAST PARCEL 4 – PHASE 2 PROJECT**

March 2023

SECTION 1.0 INTRODUCTION

1.1 PURPOSE OF MEMORANDUM

The California Legislature has established a series of statutory exemptions to the California Environmental Quality Act (CEQA). As articulated by the California Supreme Court, statutory exemptions represent a determination of the legislature that specific interests are sufficiently important to justify forgoing formal environmental review. *Napa Wine Train, Inc. v. Pub. Util. Comm'n*, 50 Cal. 3d 370, 382 (1990).

One such interest is the development of residential projects to address the severe statewide housing shortage. Government Code Section 65457 provides a statutory exemption to CEQA review for any residential development project that is undertaken to implement and that is consistent with a specific plan for which an Environmental Impact Report (EIR) has been certified after January 1, 1980 (CEQA Guidelines Section 15182(c)). For a mixed-use specific plan, a residential project consistent with the plan is eligible for the exemption. *Concerned Dublin Citizens v. City of Dublin*, 214 Cal. App. 4th 1301, 1315 (2013).

On November 13, 2018, the City of Santa Clara certified the Tasman East Specific Plan Final Environmental Impact Report (TESP FEIR) and approved the Tasman East Specific Plan (TESP) project. The TESP was envisioned by the City to create a Transit-Oriented Development Mixed-Use Neighborhood. The TESP supports existing and planned land uses in the project area. The TESP FEIR analyzed the development of up to 4,500 dwelling units, approximately 106,000 square feet of retail space (including a 25,000 square foot grocery store) and a 600-student school in the City of Santa Clara.

Because the TESP is a specific plan for a mixed-use development with a certified EIR, residential projects implementing the TESP are potentially eligible for the Section 65457 exemption. The exemption contains a limitation, however; according to the statute, “if after adoption of the specific plan, an event as specified in Section 21166 of the Public Resources Code occurs, the exemption provided by this subdivision does not apply unless and until a supplemental environmental impact report for the specific plan is prepared and certified.” An “event as specified in Section 21166 of the Public Resources Code,” in turn, is any one of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified

significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If none of the conditions described in Section 21166 calling for preparation of a subsequent EIR have occurred, a residential project implementing a specific plan will be eligible for the statutory exemption, and no further environmental review is required.

This memorandum analyzes the Tasman East Parcel 4 – Phase 2 Project to determine its eligibility for the Government Code Section 65457 statutory exemption. The proposed project would redevelop approximately 7.76 acres located in the southeastern portion of the TESP area which is currently developed with five light industrial buildings and accessory structures totaling approximately 191,812 square feet. The project would construct two residential buildings (Buildings 4A and 4B) with up to 950 dwelling units.

Based on the proposed project description and knowledge of the project site (based on the environmental review prepared for the TESP FEIR), the City has concluded that the proposed project would not result in any new impacts not previously disclosed in the TESP FEIR and would not result in a substantial increase in the magnitude of any significant environmental impacts previously identified in the FEIR. For these reasons, the City has concluded that the project is eligible for the statutory exemption to CEQA review set forth in Government Code Section 65457.

This memorandum will not circulate for public review, but will be attached to the TESP FEIR.

A copy of the TESP FEIR is available in the City of Santa Clara at 1500 Warburton Avenue, during normal business hours, or on the City's website at www.santaclaraca.gov.

SECTION 2.0 PROJECT DESCRIPTION

2.1 OVERVIEW

The proposed project would redevelop approximately 7.76 acres [Accessor's Parcel Numbers (APNs) 097-05-056 and -057] located at 2222 Calle De Luna and 2101 Tasman Drive, within the TESP area. The project site is bound by Calle Del Mundo to the north, Calle De Luna to the east and south, and light industrial development to the west. The TESP area is approximately 46.0 acres and there are approximately 12.0 acres remaining within the TESP that could be redeveloped.¹ The TESP area is bounded by the former Santa Clara Golf & Tennis Club to the north, the Guadalupe River to the east, Tasman Drive to the south, and Lafayette Street to the west. Access to the site is currently provided via one full-access driveway on Tasman Drive and four full-access driveways on Calle De Luna. The project site and surrounding land uses are shown in Figure 2.1-1 below.

2.2 PROPOSED PROJECT

2.2.1 Proposed Development

The project site is currently developed with five light industrial buildings and accessory structures, totaling approximately 191,812 square feet. The project applicant proposes two schemes, a high-rise scheme with up to 950 dwelling units and a mid-rise scheme with up to 907 dwelling units. This memorandum analyzes the high-rise scheme, the larger project, as it provides a more conservative analysis of potential project effects.

As proposed, the project would demolish the existing buildings and construct two 21-story residential buildings (Buildings 4A and 4B) with a combined total of 950 dwelling units. Building 4A would be located east of the future Lick Mill extension and west of Guadalupe River, while Building 4B would be located north of Tasman Drive and west of the future Lick Mill Boulevard extension (refer to Figure 2.2-1). The proposed buildings would have a density of approximately 122 dwelling units per acre (du/ac).² The project proposes a total of 74,486 square feet of public open space. A description of Buildings 4A and 4B are discussed below.

All five driveways would be removed and replaced. One new full-access driveway would be provided along the east side of the future Lick Mill Boulevard extension for Building 4A and one full access driveway, on the west side of the future Lick Mill Boulevard extension, would be provided for Building 4B.

Building 4A

A total of up to 590 dwelling units, including 17 townhouses, are proposed within Building 4A. Amenity space, including a pool lounge, fitness center, and game/gathering room are proposed. A total of 627 vehicular parking spaces are proposed above-grade which would be located on floors one to seven of the building. The project proposes up to 360 bicycle parking spaces for Building 4A. The building would be up to 222 feet to the top of the rooftop mechanical equipment screen. A 1.70-acre

¹ The developments associated with 2343 Calle Del Mundo, 2300 Calle De Luna, and 5123 Calle Del Sol are currently under construction. The development associated with 2233 Calle Del Mundo is now fully constructed and operational.

² 950 proposed dwelling units / 7.76 acres = 122 du/ac.



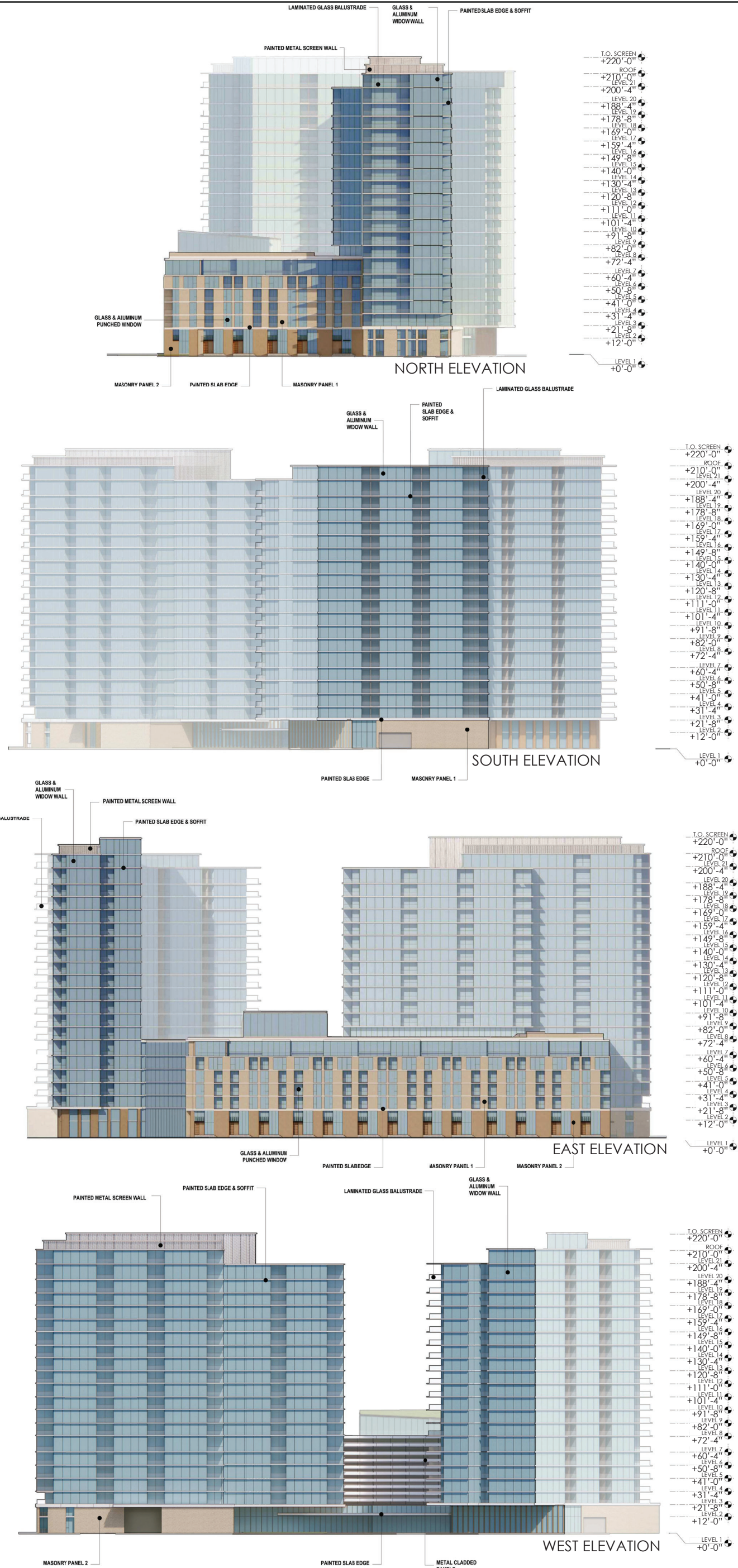
AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 2.1-1



SITE PLAN - GROUND LEVEL

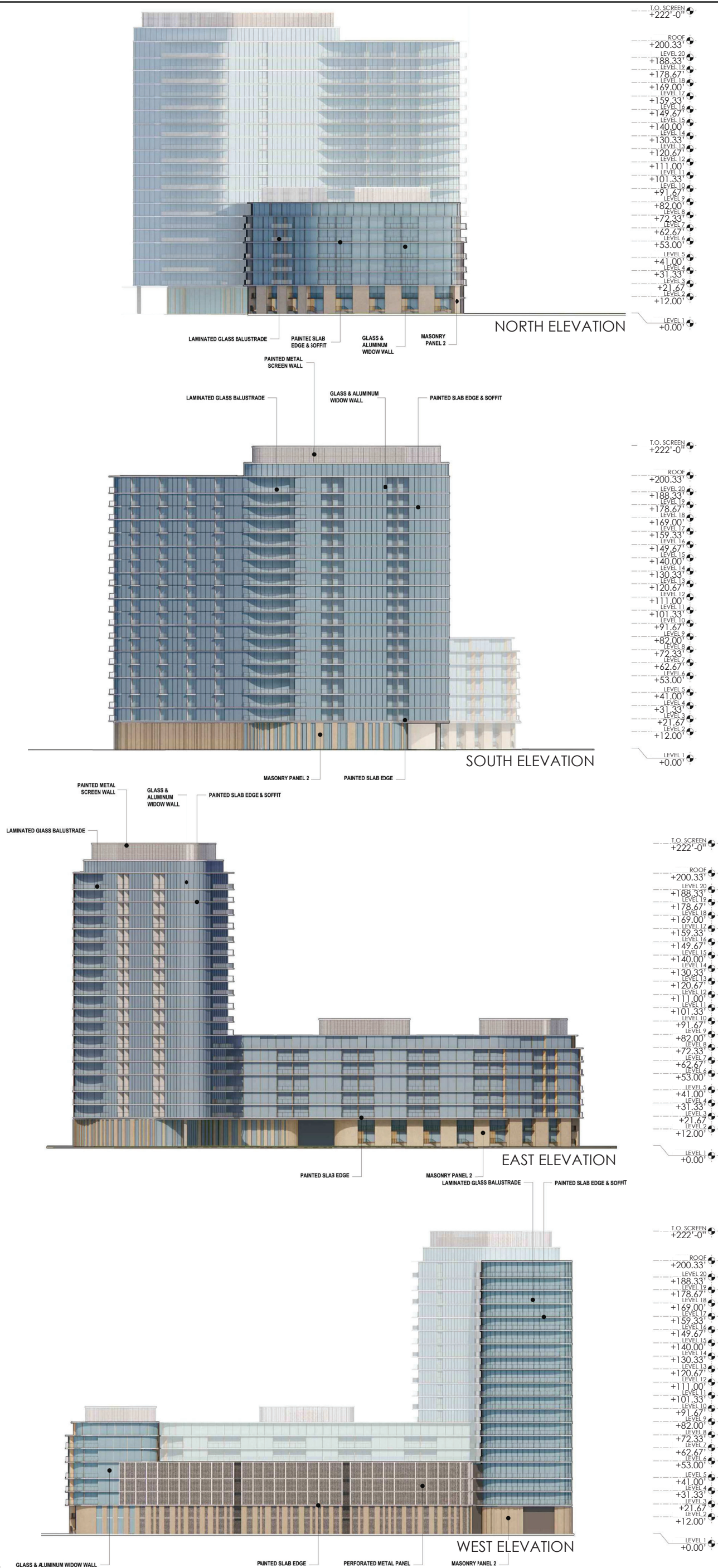
FIGURE 2.2-1



Source: Steinberg Hart, July 15, 2022.

BUILDING 4A ELEVATIONS

FIGURE 2.2-2



Source: Steinberg Hart, July 15, 2022.

BUILDING 4B ELEVATIONS

FIGURE 2.2-3

park is proposed immediately north of Building 4A. Refer to Figure 2.2-2 above for the building elevations.

Building 4B

Building 4B would have up to 360 dwelling units, including eight townhouses, and 397 vehicular parking spaces. Parking is proposed on floors one to five. The project proposes up to 120 bicycle parking spaces for Building 4B. Amenity space, including a pool and pool deck are proposed. The building would be up to 222 feet to the top of the rooftop mechanical equipment screen. Refer to Figure 2.2-3 above for the building elevations.

2.2.1 Green Building Measures

The proposed project would be required to be built in accordance with the California Green Building Standards Code (CALGreen), which includes design provisions intended to minimize wasteful energy consumption. The project would be designed to achieve the minimum Leadership in Energy and Environmental Design (LEED) Silver certification, or equivalent such as Build It Green.

2.2.2 Transportation Demand Management Plan

Transportation Demand Management (TDM) programs are intended to reduce vehicle trips and parking demand by promoting the use of multimodal transportation options. As discussed in the TESP FEIR, the City’s Climate Action Plan (CAP) requires that all residential projects implementing the TESP develop and implement a plan for a minimum 20 percent reduction in Vehicle Miles Traveled (VMT) with a minimum of 10 percent being achieved through a TDM Plan. Consistent with this mandate, the project would include the following TDM Measures:

Table 2.2-1: Proposed TDM Measures
<i>Bicycle and Pedestrian Facilities</i>
Bicycle Parking
Bike Share Program*
Resources (maps)*
<i>Carpool and Vanpool Programs</i>
On-site Ride-matching Assistance**
511 Ride-matching Assistance
Carpool/Vanpool Incentives for New Users
<i>Car Share Program</i>
Parking space for docking station
<i>Transit Elements</i>
Universal Transit Pass Program*
<i>Online Info Center for Tasman East</i>
Online Kiosk: website with information*
Information Packets for New Residents*
<i>Program Marketing, Administration, Monitoring and Reporting</i>
Tasman East Transportation Coordination Group (TETCG) Membership
Designating a Transportation Coordinator
Marketing/promotions of alternative methods**
Annual count of vehicles entering the site
Annual reporting to the City**

Table 2.2-1: Proposed TDM Measures

Note: * This TDM measure is provided by the TETCG as part of the Tasman East Site wide TDM Program. The TETCG is comprised of all residential property owners and developments who will oversee these programs.

** The transportation coordinator would be responsible for this.

Source: Hexagon Transportation Consultants, Inc. *2101 Tasman Drive Residential Development Transportation Demand Management Plan*. November 15, 2022.

2.2.3 General Plan and Zoning Designations

The project site has a General Plan land use designation of *Transit Neighborhood* (100-350 du/ac), which allows multi-family residential uses and supportive commercial and public/quasi-public uses. This density range is intended to take advantage of proximity to transit, offering an urban feel, including a positive public realm within a right-of-way accommodating all modes of transportation. Building forms are typically mid- to high-rise buildings featuring structured or below-grade parking, as well as shared outdoor space. Under the TESP, all sites of one acre or more in size are required to accommodate a minimum density of 100 du/ac. Each parcel of less than one acre in size is required to accommodate a minimum density of 60 du/ac.

The site is zoned *Transit Neighborhood* (TN), which allows for development of a high-density residential neighborhood with a mix of uses at the ground floor. Consistent with the General Plan designation described above, residential densities within the TN zoning district would range from a minimum of 60 du/ac on sites less than one acre in size to a minimum of 100 du/ac for sites of one acre or larger in size with no maximum density for individual parcels, all the while maintaining an overall unit cap of 4,500 units for the entire TESP area.

The project proposes residential development and would have a density of 122 du/ac, consistent with the *Transit Neighborhood* General Plan and zoning designations.

SECTION 3.0 ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT

The discussion below describes the environmental impacts of the proposed project compared to the impacts of the approved TESP FEIR. Also noted are any changes that have occurred in the environmental setting that would result in new impacts or impacts of greater severity than those identified in the previously certified FEIR. This memorandum only addresses those resource areas which could potentially have new impacts or impacts of greater severity (specific to the project site) than were addressed in the TESP FEIR. Based on the project's consistency with the development assumptions and General Plan and zoning designations, the proposed project would have the same impacts in regard to the following environmental issues:

- Aesthetics
- Agricultural Resources
- Cultural Resources/Tribal Cultural Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Land Use
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems

All relevant best management practices, conditions of approval, and mitigation measures identified in the TESP FEIR for these resource areas are incorporated by reference and would be required by the project.

The proposed project includes the construction of 950 dwelling units in two, 21-story residential buildings and a 1.70-acre park. This memorandum analyzes the impacts of the proposed project and consistency with the TESP FEIR in regard to the following environmental issues:

- Air Quality
- Biological Resources
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Noise

3.1 EXISTING SETTING

The project site and area consist of light industrial and commercial buildings in the City of Santa Clara. The project site is bound by a light industrial building to the north, Guadalupe River to the east, Tasman Drive to the south, and a commercial building and a site, located at 5123 Calle Del Sol, that is currently under construction to the west. Since approval of the TESP project in 2018, there are currently three sites (e.g., 2343 Calle Del Mundo, 2300 Calle De Luna, and 5123 Calle Del Sol) within the TESP area that are currently under construction. In addition, the 2233 Calle Del Mundo Residential Project, File No. PLN2018-13446, at 2233 Calle Del Mundo is currently built and units are being leased.

3.2 AIR QUALITY

The following analysis addresses the potential air quality impacts that would result from construction and operation of the proposed project.

3.2.1 Findings of the Previously Certified FEIR

3.2.1.1 *Construction Emissions*

Construction activities from full build out of the TESP may generate dust and other particulate matter (PM₁₀ and PM_{2.5}) that could temporarily impact nearby land uses, particularly sensitive receptors. In addition, construction equipment and associated heavy-duty truck traffic would generate diesel exhaust, a known toxic air contaminant (TAC) which would pose a community risk to nearby sensitive receptors.

Construction exhaust emissions include those from equipment (i.e., off-road) and traffic (on-road vehicles and trucks). Off-road construction equipment is often diesel-powered and can be a substantial source of nitrogen oxide (NO_x) emissions, in addition to PM₁₀ and PM_{2.5} emissions. Architectural coatings and application of asphalt pavement are dominant sources of reactive organic gases (ROGs) emissions. The combination of temporary dust from activities and diesel exhaust from construction equipment and related traffic may exceed Bay Area Air Quality Management District's (BAAQMD's) project-level thresholds on a project-by-project basis, which would potentially lead to more than 10 in one million excess cancer cases. Additionally, NO_x emissions during grading and soil import/export may exceed the BAAQMD NO_x emission thresholds. The TESP FEIR identified the following air quality impact.

Impact AQ-1: The project would result in significant construction air pollutant emissions due to dust generation and emissions of TACs and criteria pollutants during construction.

The following mitigation measures were included in the approved project to control dust and reduce construction TAC and criteria pollutant emissions during construction:

MM AQ-1.1: During any construction period ground disturbance, the applicant shall ensure that the project contractor implements the following Bay Area Air Quality Management District (BAAQMD) best management practices (BMPs):

- All exposed unpaved 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 miles per hour (mph).
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. 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 five 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 construction firm 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.
- The contractor shall install temporary electrical service whenever possible to avoid the need for independently powered equipment (e.g. generators).

MM AQ-1.2:

Construction criteria pollutant and TAC quantification will be required on a project-level basis for individual development projects once those details are available through modeling to identify impacts and, if necessary, include measures to reduce emissions. The analysis must be submitted for City review and approval, once complete. Health risks from construction TACs shall be reduced below 10 in one million excess cancer cases, a hazard index of 1.0, and PM_{2.5} emissions of 0.3 µg/m³. Criteria pollutant emissions shall not exceed BAAQMD construction criteria pollutant emissions thresholds.

Reduction in emissions can be accomplished through, though is not limited to, the following measures:

- Construction equipment selection for low emissions;
- Use of alternative fuels, engine retrofits, and added exhaust devices;

- Low-VOC paints;
- Modify construction schedule; and
- Implementation of BAAQMD Basic and/or Additional Construction mitigation measures for control of fugitive dust.

Implementation of mitigation measures AQ-1.1 and AQ-1.2, would ensure that construction emissions impacts from individual development projects under the TESP would be reduced to a less than significant level.

3.2.1.2 *Operational Emissions*

The TESP FEIR concluded that full build out of the TESP would result in long-term area and mobile source emissions from operation of subsequent development. Build out of the TESP would exceed the BAAQMD significance threshold for ROG_s and NO_x. The TESP FEIR identified the following air quality impact.

Impact AQ-2: The operation of the project would result in significant operational ROG and NO_x emissions thereby contributing to regional ozone impacts.

The following mitigation measures were included in the approved project to reduce operational ROG and NO_x emissions impacts:

MM AQ-2.1: Proposed residential development within the TESP shall implement Transportation Demand Management (TDM) programs to reduce residential vehicle miles traveled as required by the City’s Climate Action Plan. The TDM programs would be reviewed and approved by the Community Development Director prior to issuance of building permits. An annual TDM monitoring report shall be submitted to the Community Development Director to document each development is meeting the required TDM program reductions.

MM AQ-2.2: Proposed development within the TESP shall incorporate additional green building measures such as rooftop solar photovoltaic (PV) systems, rough-ins for electric vehicle charging, use of efficient lighting and irrigation, and recycled water, as feasible, to the satisfaction of the Community Development Director.

MM AQ-2.3: Developed parcels shall require within their covenants, conditions, and restrictions (CC&Rs) and/or ground leases requirements for all future interior spaces to be repainted only with architectural coatings that meet the “Low-VOC” or “Super-Compliant” requirements. “Low-VOC” refers to paints that meet the more stringent regulatory limits in South Coast Air Quality Management District (AQMD) Rule 1113; however, many manufacturers have reformulated to levels well below these limits. These are referred to as “Super-Compliant” Architectural Coatings.

Even with implementation of the identified mitigation measures, ROG and NO_x emissions from operation of the project would remain significant and unavoidable.

3.2.2 Air Quality Impacts Resulting from the Proposed Project

A Construction Air Quality and Health Risk Assessment was prepared by Illingworth & Rodkin, Inc. in December 2022. A copy of this report is provided in Appendix A of this document.

3.2.2.1 *CEQA Thresholds of Significance*

Impacts from the Project

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 Santa Clara has carefully considered the thresholds updated by BAAQMD in May 2017 and regards these thresholds (refer to Table 3.2-1 below) to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and fine particulate matter that is 2.5 microns or less in width (PM_{2.5}).

Table 3.2-1: Thresholds of Significance Used in Air Quality Analyses			
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})	BMPs	None	None
Risk and Hazards for New Sources and Receptors (Project)	Same as Operational Threshold	<ul style="list-style-type: none"> • 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/m³ [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	<ul style="list-style-type: none"> • 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/m³ [Zone of influence: 1,000-foot radius from property line of source or receptor] 	
<p>Notes: ROG = reactive organic gases, NO_x = nitrogen oxide, PM₁₀ = coarse particulate matter or particulates with a diameter of 10 micrometers (μm) or less, PM_{2.5} = fine particulate matter or particulates with a diameter of 2.5μm or less. Source: BAAQMD CEQA <i>Thresholds Options and Justification Report (2009)</i> and BAAQMD CEQA <i>Air Quality Guidelines (dated May 2017)</i>.</p>			

3.2.2.2 Construction Period Emissions – Criteria Pollutants

Construction period emissions were estimated using the California Emissions Estimator Model, Version 2020.4.0 (CalEEMod). The proposed 950 dwelling units and 1,035 parking spaces are assumed to be constructed over 26 months beginning in June 2024 (approximately 565 construction workdays). Refer to Appendix A for a list of inputs that were used in CalEEMod. Table 3.2-2 below shows the average daily emissions from construction period criteria pollutants for each year of construction.

Table 3.2-2: Construction Period Criteria Pollutant Emissions				
Construction Year	ROG	NO_x	PM₁₀	PM_{2.5}
<i>Construction Emissions Per Year (tons)</i>				
2024	0.19	0.89	0.06	0.03
2025	5.41	2.08	0.14	0.08
2026	4.16	1.27	0.09	0.05
Total	9.76	4.24	0.29	0.16
<i>Average Daily Construction Emissions Per Day (pounds per day)</i>				
2024 (132 construction workdays)	2.84	13.44	0.92	0.46
2025 (261 construction workdays)	41.47	15.93	1.05	0.58
2026 (171 construction workdays)	48.65	14.80	1.01	0.55
Average Daily Total	34.55	14.98	1.00	0.54
BAAQMD Thresholds (pounds per day)	54	54	82	54
Exceed Threshold?	No	No	No	No

As shown in the table above, construction period criteria pollutant emissions associated with the proposed project would not exceed the BAAQMD significance thresholds. Therefore, the project would not result in a significant impact from construction emissions. The proposed project would not result in any new impacts or substantially increase the severity of the previously identified construction criteria pollutant air quality impacts.

3.2.2.3 Construction – Community Risk Impacts

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, a known TAC, and could pose a risk to sensitive receptors such as nearby residents. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to PM_{2.5}. A construction health risk assessment was prepared to evaluate the potential health effects of nearby sensitive receptors from construction diesel particulate matter (DPM) and PM_{2.5} emissions.

Construction period emissions were modeled using CalEEMod, which provides total annual PM₁₀ exhaust emissions for off-road construction equipment, and Emission FACtors 2021 model (EMFAC2021), which provides exhaust emission rates from on-road vehicles. Additionally, the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) was used to predict construction-related DPM and PM_{2.5} concentrations at existing sensitive receptors in the vicinity of the project site. The model, assumptions, and results are described further in Appendix A.

The maximum-modeled annual DPM and PM_{2.5} concentrations were identified at a multi-family residence located south of the site, at the corner of the Tasman Drive/Lick Mill Boulevard intersection. The maximum exposed individual (MEI) is designated in red as shown in Figure 3.2-1 below. The construction risk impacts at the MEI are summarized in the table below.



Figure 3.2-1: Project Site and Maximum-Modeled Annual DPM and PM_{2.5} Concentrations

Source	Cancer Risk (per million)	PM _{2.5} Concentration (µg/m ³)	Hazard Index (HI)
Project Construction Unmitigated	8.37 (infant)	0.09	<0.01
BAAQMD Single-Source Threshold	>10.0	>0.3	>1.0
Significant?	No	No	No

At the construction MEI, the maximum residential cancer risk for would be 8.37 cases per one million for infants and 0.20 cases per one million for adults which is below BAAQMD’s significance threshold of 10 cases per one million for cancer risk. As shown in the table above, the annual PM_{2.5} concentration and hazard index (HI) concentration from construction would not exceed BAAQMD’s significance thresholds of 0.3 µg/m³ or HI greater than 1.0, respectively. Therefore, the proposed project would not result in any new community risk impacts due to project construction or substantially increase the severity of the previously identified impact.

3.2.2.4 Operational Emissions – Criteria Pollutants

Based on the conclusions of the TESP FEIR, all residential development proposed would be required to implement a TDM program and incorporate green building measures into the project. Consistent with mitigation measure AQ-2.1 identified in the TESP FEIR, the proposed project includes project-specific TDM measures to reduce residential VMT as required by the City’s CAP. The CAP requires a minimum 20 percent reduction in VMT, with half that amount (a minimum of 10 percent) being achieved through a TDM plan. Consistent with the City’s CAP, the project proposes the following TDM measures as shown in Table 3.2-4 below.

Table 3.2-4: Proposed TDM Measures
<i>Bicycle and Pedestrian Facilities</i>
Bicycle Parking
Bike Share Program*
Resources (maps)*
<i>Carpool and Vanpool Programs</i>
On-site Ride-matching Assistance**
511 Ride-matching Assistance
Carpool/Vanpool Incentives for New Users
<i>Car Share Program</i>
Parking space for docking station
<i>Transit Elements</i>
Universal Transit Pass Program*
<i>Online Info Center for Tasman East</i>
Online Kiosk: website with information*
Information Packets for New Residents*
<i>Program Marketing, Administration, Monitoring and Reporting</i>
TETCG Membership
Designating a Transportation Coordinator
Marketing/promotions of alternative methods**
Annual count of vehicles entering the site
Annual reporting to the City**
Note: * This TDM measure is provided by the TETCG as part of the Tasman East Site wide TDM Program. The TETCG is comprised of all residential property owners and developments who will oversee these programs. ** The transportation coordinator would be responsible for this. Source: Hexagon Transportation Consultants, Inc. <i>2101 Tasman Drive Residential Development Transportation Demand Management Plan</i> . November 15, 2022.

In addition, consistent with mitigation measures AQ-2.2 and AQ-2.3 of the TESP FEIR, the project would include the following green building measures.

- Stormwater treatment on-site
- Provide a total of 480 bicycle parking spaces (360 within Building 4A and 120 within Building 4B)
- Divert a minimum of 65 percent of construction and demolition waste per the City’s Construction and Demolition Debris Recycling Program
- Irrigation shall comply with the State of California’s Model Water Efficient Landscape Ordinance and City of Santa Clara design guidelines

With implementation of the TDM plan and green building measures, the project would have a less than significant impact on operational ROG and NO_x emissions. While full build out of the TESP would have a significant and unavoidable operational criteria pollutant emissions impact, the proposed project is consistent with the development projections in the TESP FEIR and would not result in any new impacts or substantially increase the severity of the previously identified air quality impacts.

3.2.2.5 Combined Community Risk Impacts at Construction MEI

Community health risk assessments typically look at all sources of TACs (including highways, streets, and stationary sources identified by BAAQMD) within 1,000 feet of a project site. Tasman Drive and Lick Mill Boulevard are identified as mobile sources of TACs in the TESP FEIR. The Union Pacific Railroad (UPRR) is located over 1,000 feet from the project site and would not be a substantial source of TACs. BAAQMD's stationary source geographic information systems (GIS) map tool identified four stationary sources that could potentially impact the project site and MEI. Of the four sources, two stationary sources were deemed to pose no risk or would no longer pose a risk due to removal and/or location relative to the site and are not further discussed.

Roadway

Traffic on high volume roadways (10,000 average daily trips [ADT] or more) is a source of TAC emissions that may adversely impact sensitive receptors in close proximity to the roadways. Tasman Drive has an ADT of 30,010 vehicles and Lick Mill Boulevard has an ADT of 17,610 vehicles. Since Tasman Drive and Lick Mill Boulevard are located within 1,000 feet of the project site and are estimated to have an ADT exceeding 10,000 vehicles, a refined analysis of potential health impacts from vehicular traffic was prepared by Illingworth & Rodkin, Inc. The refined analysis included a prediction of emissions for traffic volume and mix of vehicle types on nearby roadways and the use of an atmospheric dispersion model to TAC exposures. The associated cancer risks are estimated based on the modeled exposures. Refer to Appendix A of this document for more information.

Stationary Sources

There are two existing stationary sources within 1,000 feet of the MEI (Facility IDs 24828 and 23330). Facility ID 24828 is an emergency generator and Facility ID 23330 is a light industrial source.

TESP Cumulative Projects

At the time the Construction Air Quality and Health Risk Assessment was completed, seven projects were approved and three projects were pending within the TESP area including:

Approved Projects

- 2343 Calle Del Mundo
- 5123 Calle Del Sol
- 2200 Calle De Luna
- 2225 Calle De Luna/2232 Calle Del Mundo
- 2300 Calle De Luna

- 2233 Calle Del Mundo³
- 2302/2310 Calle Del Mundo

Pending Projects

- 5185 Lafayette
- 2263 Calle Del Mundo
- 2354 Calle Del Mundo

While many of the approved projects could be completed prior to construction of the proposed project, the construction impacts from these projects were included to provide a conservative estimate of health risk impacts (refer to Appendix A for more information). Projects that are currently under construction, are located further from the MEI than the proposed project or are located more than 1,000 feet from the project site were not included in this analysis.

Figure 3.2-2 below shows the project site and nearby sources of TACs. Table 3.2-5 summarizes the TAC sources near the project site.



Figure 3.2-2: Project Site and Nearby Sources of TACs

³ Note that the approved project located at 2233 Calle Del Mundo is now fully constructed and operational. This would lessen the cumulative impact and would not change the conclusions of the analysis.

Table 3.2-5: Stationary and Mobile Sources Community Risk Levels

Source	Maximum Cancer Risk (per million)	Maximum Annual PM _{2.5} Concentration (µg/m ³)	Maximum Hazard Index
Project Construction Unmitigated	8.37 (infant)	0.09	<0.01
TESP Cumulative Construction Projects	11.90 (infant)	0.03	<0.08
Tasman Drive	4.02	0.42	<0.01
Lick Mill Boulevard	1.35	0.12	<0.01
EPZ, Inc. (Facility ID 23330) at 300 feet	<0.01	<0.01	<0.01
Zayo Group, LLC. (Facility ID 20241) at 780 feet	0.20	<0.01	<0.01
Combined Total (Unmitigated)	25.85	<0.68	<0.13
<i>BAAQMD Threshold – Combined Sources</i>	>100	>0.8	>10.0
Threshold Exceeded? (Unmitigated)	<i>No</i>	<i>No</i>	<i>No</i>

As shown above, the project, when combined with other nearby sources, would be below BAAQMD’s significance threshold at the construction MEI, consistent with the findings of the TESP FEIR. The proposed project would not result in any new impacts or substantially increase the severity of the previously identified air quality impacts.

3.3 BIOLOGICAL RESOURCES

The following analysis addresses the potential biological resources impacts that would result from implementation of the proposed project. Specifically, the analysis addresses impacts to birds (bird strikes) and loss of trees.

Ruderal grassland, perennial freshwater wetlands, and riparian habitats have been identified in the northeast corner of the TESP area and along the eastern boundary. The project site is classified as developed land with no sensitive habitats or special-status species present. Therefore, implementation of the proposed project would not contribute to any identified impacts to protected habitats and special-status species and no further analysis is required.

Construction impacts on nesting birds would be the same on all project sites within the TESP area. The TESP FEIR identified mitigation measures required of all projects under the TESP to reduce impacts to nesting birds to less than significant levels. These mitigation measures are incorporated by reference and no further analysis is required.

3.3.1 Findings of the Previously Certified FEIR

3.3.1.1 *Bird Strikes*

Based on the approved project, numerous resident and migratory songbirds are known to occur at the Ulistac Natural Area, south of Tasman Drive and a number of songbirds, waterbirds, and wetland-associated birds also occur along the Guadalupe River. Development proposed within the TESP area would be a maximum height of 220 feet. Some of the birds using habitats within the TESP, Guadalupe River, and Ulistac Natural Area are expected to strike the buildings, resulting in injury or death.

Impact BIO-3: The project proposes structures with lighting, glass windows, building facades, and vegetation which may result in impacts to migrant birds.

The following mitigation measures were included in the approved project to reduce impacts to the migratory birds.

MM BIO-3.1: Due to the potential for buildings in the TESP area to result in high numbers of bird collisions, particularly if extensive glass facades are used, all new construction and building additions within the TESP area will implement the following bird-safe building design considerations:

- Reduce the extent of glass on the facades of new buildings and additions to the extent feasible.
- Reduce or eliminate the visibility of landscaped areas behind glass.
- No more than 10 percent of the surface area of a building's total exterior façade shall have untreated glazing between the ground and 60 feet above ground, unless located within 300 feet of the top of bank of the Guadalupe River within such boundary this requirement would extend to the entirety of the structure. Bird-safe glazing treatments may include fritting, netting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing or ultraviolet patterns visible to birds. Vertical elements of the window patterns should be at least 0.25 inches wide at a maximum spacing of four inches or have horizontal elements at least 0.125 inches wide at a maximum spacing of two inches. Any remaining untreated glazed areas will be broken up into sections no greater than 24 square feet in size by mullions or bird-safe glazing treatments.
- Avoid free-standing clear glass walls, skywalks, transparent building corners, glass enclosures (e.g., greenhouses) on rooftops, and balconies with unbroken glazed segments 24 square feet and larger where feasible. If any such features are included in building designs, all glazing used in any such features will be 100 percent treated.
- Reduce glass at tops of buildings, especially when incorporating a green roof into the building design.
- If a green roof or green wall is incorporated into the building design, no more than 10 percent of the surface area of the building's combined facades within 12 vertical feet above and/or below the green roof or green wall shall have untreated glazing. Any remaining untreated glazed areas will be broken up into sections no greater than 24 square feet in size by mullions or bird-safe glazing treatments.
- Avoid the funneling of flight paths between buildings or trees towards a glazed building façade.
- Landscaping, including planted vegetation and water features, shall be designed to minimize the potential for collisions. For example, vegetation providing particularly valuable resources to birds (such as fruits) will be planted away from buildings with extensive glazing, and vegetation in

general will be planted in such a way that it is not clearly reflected in windows. Water features would be located away from building exteriors to reduce the attraction of birds toward glazed facades.

- Minimize exterior lighting to the extent feasible, except as needed for safety. All exterior lights shall be directed toward facilities in the Plan Area (e.g., rather than directed upward or outward) and shielded to ensure that light is not directed outward toward the Guadalupe River or Ulistac Natural Area.
- Occupancy sensors or other switch control devices shall be installed on interior lights, with the exception of emergency lights or lights needed for safety purposes. On commercial buildings, these lights shall be programmed to shut off during non-work hours and between 10:00 p.m. and sunrise.

The City may waive or reduce any of the above-listed bird-safe design requirements based on analysis by a qualified biologist indicating that proposed construction will not pose a collision hazard to birds. Such a waiver will generally not be appropriate for façades adjacent to well-vegetated areas, but a waiver may be appropriate, for example, for façades that face developed areas lacking vegetation, water features, or other features that would be particularly attractive to birds.

Mitigation measure BIO-3.1 incorporates bird-safe design elements into future building designs and reduces impacts to birds to the extent feasible. The TESP FEIR determined that with implementation of the identified mitigation measures, future development under the TESP would continue to result in a significant unavoidable avian collision impact.

3.3.1.2 *Increased Lighting*

Build out of the TESP would increase lighting compared to existing conditions. Wildlife species using the Guadalupe River and/or Ulistac Natural Area would be subject to increased predation, decreased habitat availability, and alterations of physiological processes if development under the TESP produces greater illuminance than the existing conditions.

Impact BIO-4: Increased artificial lighting may adversely impact bird species by increasing predation, decreasing habitat availability, and altering physiological processes.

The following mitigation measures were included in the approved project to minimize lighting impacts on birds.

MM BIO-4.1: To the extent consistent with the normal and expected operations of commercial and/or residential uses under the TESP, take appropriate measures to avoid use of unnecessary lighting at night, especially during the bird migration season (February through May and August through November). Such measures may include the installation of motion-sensor lighting, automatic light shut-off mechanisms, downward-facing exterior light

fixtures, and others. Exterior lighting within the Specific Plan area will be shielded as needed to block illumination from shining upward, or outward into the Guadalupe River to the east or Ulistac Natural Area to the south. Lighting plans for each development site shall be reviewed and approved by the Community Development Director prior to the issuance of building permits.

Based on the TESP FEIR, implementation of the identified mitigation measure would minimize lighting and reduce lighting impacts to a less than significant level.

3.3.1.3 *Trees*

Implementation of the TESP would result in the removal of numerous trees within the TESP area. Existing trees throughout the TESP area include a mixture of non-native or not naturally-occurring, planted, ornamental species including eucalyptus, acacias, and London planes. The General Plan requires replacement of trees removed as part of a proposed development project.

The TESP FEIR concluded that removal of trees within the TESP area would not have a significant impact on wildlife because the trees are mostly landscape and non-native species that are not regionally limited. Given the substantial number of trees that would be removed by development proposed under the TESP, impacts to mature trees from future development under the TESP would result in a significant impact.

Impact BIO-10: Tree removal from redevelopment of individual parcels under the Specific Plan would result in a significant impact to mature trees.

The following mitigation measures were included in the approved project to reduce impacts from tree removal.

MM BIO-10.1: Projects proposing or required to retain trees on-site shall implement precautionary measures during site construction to limit adverse environmental effects on ordinance-protected trees that are to be retained. A tree protection plan shall be prepared by a qualified arborist that, at a minimum, requires installation of an open material (e.g., chain link) fence six feet in height around the drip line and maintenance of the existing grade level around a tree and out to its drip line.

MM BIO-10.2: Project proponents under the TESP will comply with the City Code and submit permit applications for removal of all trees covered by the City's tree ordinance. Any street trees or heritage trees to be removed would require replacement on-site or off-site at a minimum 2:1 ratio per General Plan Policy 5.3.1-P10. To the extent feasible, the replacement trees will be planted on-site, and the project proponent will comply with all other tree removal requirements imposed by the City.

Implementation of mitigation measures BIO-10.1 and BIO-10.2 would reduce impacts to trees to a less than significant level.

3.3.2 Biological Resources Impacts Resulting from the Proposed Project

3.3.2.1 *Bird Strikes*

The TESP FEIR concluded that all new buildings, including the proposed project, would have the potential for bird strikes and are required to incorporate bird safe design features. In December 2022, H.T. Harvey & Associates prepared an Avian Collision Risk Assessment for the proposed project. A copy of this report is provided in Appendix B.

The following analysis outlines the project's design elements and its compliance with mitigation measure BIO-3.1.

Reduce the extent of glass on the façades of new buildings to the extent feasible.

The ground floor and parking garages of Buildings 4A and 4B would incorporate opaque façade areas which would reduce glazing on these buildings. A portion of the Building 4A podium façades, where residential units would be located, would also include opaque façade areas. While the façades of these buildings would include opaque areas, both buildings would be predominantly glazed. Per mitigation measure BIO-3.1, all new construction and building additions within the TESP area shall reduce the extent of glass on the façades to the extent feasible. The EIR recognized that “[m]ost often, bird collisions have been related to the extent of reflective and/or untreated glass on the building which provides the strongest opportunity for a collision,” and to that end, the construction would feature treated glazing in areas of the building with high collision risk, as discussed below. As is typical for residential structures, the dwellings would contain sufficient windows for lighting and views from individual dwelling units, but the project would treat windows in the higher risk areas of the building to minimize collision risk. As a result, the project design would comply with this requirement.

Prohibit the visibility of interior landscaped areas behind glass

No interior landscaped areas are proposed behind glass and, as a result, the project design would comply with this requirement.

No more than 10 percent of the surface area of a building's total exterior façade shall have untreated glazing between the ground and 60 feet above ground. Bird-safe glazing treatments may include fritting, netting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing or ultraviolet patterns visible to birds. Vertical elements of the window patterns should be at least 0.25 inches wide at a maximum spacing of four inches or have horizontal elements at least 0.125 inches wide at a maximum spacing of two inches. Any remaining untreated glazed areas will be broken up into sections no greater than 24 square feet in size by mullions or bird-safe glazing treatments.

Currently, bird-safe glazing is not proposed as part of the building design for any of the buildings. As stated in mitigation measure BIO-3.1, the City may waive or reduce any of the bird-safe design requirements based on analysis by a qualified biologist indicating that proposed buildings will not pose a collision hazard to birds. Based on the Avian Collision Risk Assessment prepared for the project, the frequency of avian collisions to the proposed buildings on-site would be higher compared to other sites within the TESP area due to its distance to the Ulistac Natural Area (approximately 140

feet southeast) and to the Guadalupe River (approximately 80 feet east). The proposed vegetation that would be planted on-site include a mix of native and non-native trees, shrubs, and the proposed open space areas would be relatively large and would connect with Guadalupe River. Therefore, the assessment concluded that substantial impacts on birds colliding with the building façades would occur because bird abundance in the vicinity would be relatively high. Consistent with mitigation measure BIO-3.1, the project would be required to include the following design measure as a condition of project approval.

Condition of Project Approval:

- No more than 10 percent of the surface area of the combined façades of Buildings 4A and 4B (calculated separately for each building) shall have untreated glazing between the ground and 60 feet above ground (i.e., floors one to six). These areas are outlined in red in Figures 6 and 7 of Appendix B of this document and below. With the exception of transparent glass corners, the applicant shall determine which areas have untreated glazing. Additionally, any untreated glazed areas (e.g., the 10 percent untreated areas) on the building façades would need to be broken up into sections no greater than 24 square feet in size by mullions and bird-safe treatments.

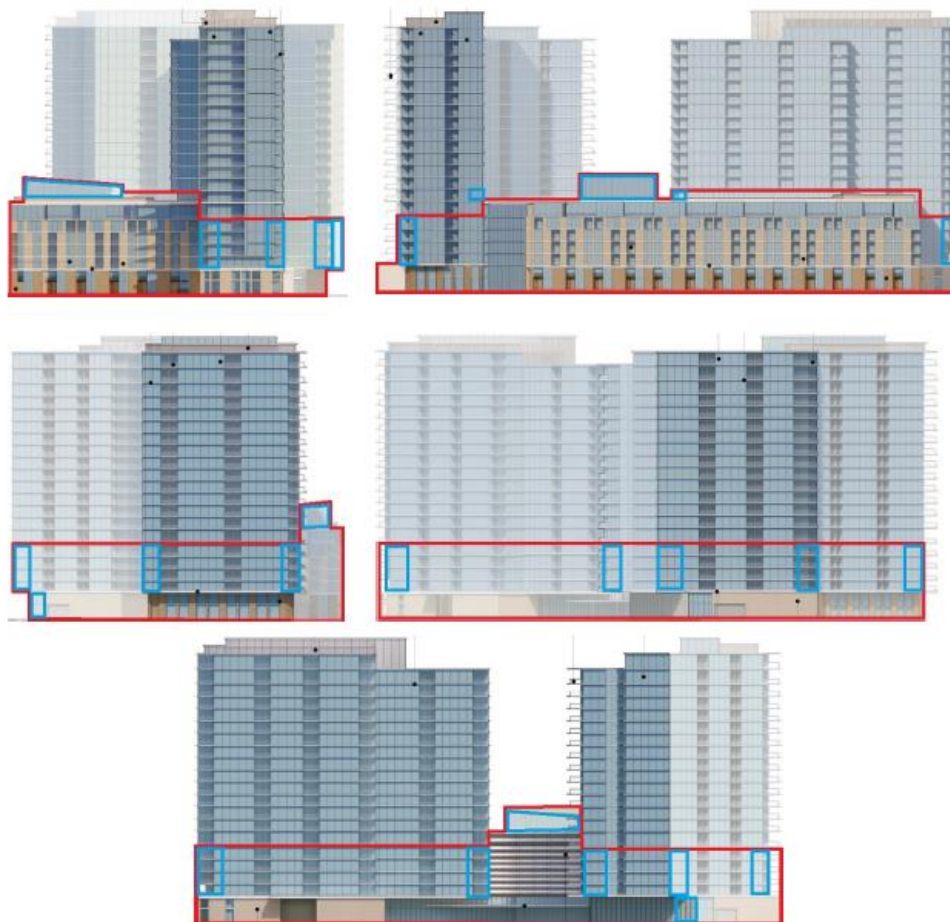


Figure 6. The north (top left), east (top right), south short volume (middle left), south (middle right), and west (bottom) facades of Building 4A. Areas outlined in red shall be treated with a bird-safe glazing treatment such that no more than 10% of the façade areas (combined) consists of untreated glazing. Areas outlined in blue (transparent glass corners) shall be 100% treated with a bird-safe glazing treatment.



Figure 7. The north (top left), east (top right), south short (middle left), south long (middle right), and west (bottom) facades of Building 4B. Areas outlined in red shall be treated with a bird-safe glazing treatment such that no more than 10% of the façade areas (combined) consists of untreated glazing. Areas outlined in blue (transparent glass corners) shall be 100% treated with a bird-safe glazing treatment.

With implementation of the condition of project approval, the project would comply with the requirements listed under mitigation measure BIO-3.1.

Avoid free-standing clear glass walks, skywalks, transparent building corners, glass enclosures (e.g., greenhouses) on rooftops, and balconies with unbroken glazed segments 24 square feet and larger where feasible. If any such structures are included in building designs, all glazing used in any such features will be 100 percent treated.

Glass railings and transparent glass corners are proposed as part of the project design which increases the risk of bird collision where they are present adjacent to landscape vegetation. No glass enclosures are proposed. The assessment identified the following areas of high collision risk: 1) all free-standing glass railings and transparent glass corners within 60 feet above the ground (e.g., floors one to six of Buildings 4A and 4B) and 2) all free-standing glass railings and transparent glass corners adjacent to the eighth floor terrace in Building 4A and sixth floor terrace in Building 4B.

Consistent with mitigation measure BIO-3.1, the project would be required to comply with the following condition of project approval.

Conditions of Project Approval:

- All glass railings and transparent glass corners within 60 feet of the ground and eighth floor terrace in Building 4A and the sixth floor terrace on Building 4B shall be 100 percent treated with bird-safe glazing treatment.
- All transparent glass corners⁴ shall be 100 percent treated with a bird-safe glazing treatment within 60 feet of the ground and eighth floor terrace in Building 4A, as well as the sixth floor terrace on Building 4B. Transparent building corners shall be treated as far from the corner as it is possible to see through to the other side of the corner. The approximate extent of transparent glass corners on Buildings 4A and 4B is shown above in Figures 6 and 7 of Appendix B of this document and above.

With implementation of the condition of project approval, the project would comply with the requirements listed under mitigation measure BIO-3.1.

Reduce glass at tops of buildings, especially when incorporating a green roof into the building design.

The façades of the parking garages from the Buildings 4A and 4B podiums, as well as a portion of the Building 4A podium where the residential units would be located, would have opaque façade areas which reduces glazing at the top of the buildings where landscape vegetation is proposed. As mentioned in the conditions of project approval above, the eighth floor of Building 4A and the sixth floor of Building 4B shall be treated with a bird-safe glazing treatment such that no more than 10 percent of the façade area consists of untreated glazing, as shown above in Figures 6 and 7. As a result, the project design would comply with this requirement.

If a green roof or green wall is incorporated into the building design, no more than 10 percent of the surface area of the building's combined façades within 12 vertical feet above and/or below the green roof or green wall shall have untreated glazing. Any remaining untreated glazed areas will be broken up into sections no greater than 24 square feet in size by mullions or bird-safe glazing treatments.

Based on a review of the plans, no green walls are proposed as part of the project. The project proposes landscape vegetation on the eighth floor podium terrace in Building 4A and on the sixth floor podium terrace in Building 4B, which could result in bird collisions due to the proposed vegetation. Consistent with mitigation measure BIO-3.1, the project would be required to include the following design measures as a condition of project approval.

Condition of Project Approval:

- No more than 10 percent of the surface area of Buildings 4A and 4B's combined façades within 12 vertical feet above and/or below the eighth floor podium terrace (for Building 4A) and the sixth floor podium terrace (for Building 4B) shall have untreated glazing.

⁴ Glass corners are considered transparent when they have extensive glazing on either side such that birds are likely to see through the corners to the other side of the building.

- All untreated glazed areas within 12 feet above the fourth floor podium terraces and above the eighth floor viewing terraces shall be broken up into sections no greater than 24 square feet in size by mullions or bird-safe glazing treatments as shown in Figures 6 and 7 of Appendix B of this document and above.

With implementation of the condition of project approval, the project would comply with the requirements listed under mitigation measure BIO-3.1.

Avoid the funneling of flight paths between buildings or trees towards a glazed building façade.

The proposed buildings do not include any features that would funnel birds toward a glazed surface. Therefore, the project design would comply with this requirement.

Landscaping, including planted vegetation and water features, shall be designed to minimize the potential for collisions. For example, vegetation providing particularly valuable resources to birds (such as fruits) will be planted away from buildings with extensive glazing, and vegetation in general will be planted in such a way that it is not clearly reflected in windows. Water features would be located away from building exteriors to reduce the attraction of birds towards glazed façades.

No water features, except for pools and bioretention areas, are proposed. These features would not attract birds to the project area.

Non-native and native trees are proposed and would be located adjacent to glazed façades. While non-native trees provide limited resources for birds, native trees (e.g., Coast live oak trees) and plants provide high quality habitat for birds. Specific details of the tree and plant species that would be planted adjacent to the buildings are currently unknown. Therefore, there is potential for birds to collide with the building façades depending on where the native trees and plants are planted.

As mentioned previously, all glazed façades adjacent to landscape vegetation shall be treated with a bird-safe glazing treatment such that no more than 10 percent of the surface area of these façades have untreated glazing and all remaining untreated glazed areas shall be broken up into sections no greater than 24 square feet in size by mullions or bird-safe glazing treatment as shown on Figures 6 and 7 of Appendix B of this document and above. These bird-safe treatments would help reduce bird collisions even if landscaping (particularly native vegetation) is planted in adjacent areas. Nevertheless, consistent with mitigation measure BIO-3.1, the project shall be required to include the following measure as a condition of project approval.

Condition of Project Approval

- Landscape vegetation with flowers and fruits and native trees (e.g., Coast live oak trees) shall be removed from any planted areas located immediately adjacent to untreated glazed areas.

With implementation of the condition of approval above, the project would comply with this requirement of mitigation measure BIO-3.1.

Minimize exterior lighting to the extent feasible, except as needed for safety. All exterior lights shall be directed toward facilities in the TESP area (e.g., rather than directed upward or outward) and shielded to ensure that light is not directed outward toward the Guadalupe River or Ulistac Natural Area.

The project's lighting plan is not yet available. To ensure that the project minimizes exterior lighting to the extent feasible, the project shall comply with the exterior LEED Pilot Credit 55 lighting requirement as a condition of project approval.

Conditions of Project Approval:

- Exterior building fixtures that are not necessary for safety, building entrances, and circulation shall be automatically shut off from midnight until 6:00 AM. Manual override capability may be provided for occasional after-hour use.
- Exterior up-lighting in the project design shall be avoided.

The proposed project is located approximately 80 feet west of the Guadalupe River and approximately 140 feet northwest of the Ulistac Natural Area. Due to the project site's location to these natural areas, exterior lighting is required to be shielded so that light is not directed outwards towards these areas. With implementation of these requirements, the project would comply with this requirement of mitigation measure BIO-3.1.

Occupancy sensors or other switch control devices shall be installed on interior lights, with the exception of emergency lights or lights needed for safety purposes. Exterior shades shall also be considered to reduce light pollution. On commercial buildings, these lights shall be programmed to shut off during non-work hours and between 10:00 PM and sunrise.

As discussed above, the project would comply with the exterior LEED Pilot Credit 55 lighting requirement. Consistent with mitigation measure BIO-3.1, the project shall be required to include the following design measures as a conditions of project approval.

Conditions of Project Approval:

- Occupancy sensors or other switch control devices shall be installed on interior lights within all rooms of Buildings 4A and 4B that have north, east, and/or south-facing windows.⁵
- As an alternative to occupancy sensors, the applicant may propose a different measure to achieve the same outcome (i.e., to minimize the spill of light from windows outwards to the north, east, and south between 10:00 PM and sunrise), such as exterior window shades that automatically close between 10:00 PM and sunrise, or tinted windows.

With implementation of the conditions of project approval, the project would comply with this requirement of mitigation measure BIO-3.1.

⁵ Light from rooms that face west would not be visible to birds using the Guadalupe River or Ulistac Natural Area; therefore, occupancy sensors for lights in these rooms are not necessary to minimize bird collisions.

While full build out of the TESP would have a significant and unavoidable bird strike impact, the proposed project is consistent with the TESP FEIR and, by itself, would not result in any new impacts or substantially increase the severity of the previously identified impact with implementation of the conditions of project approval.

3.3.2.2 *Increased Lighting*

As mentioned previously, the project’s lighting plan is not yet available. It is reasonable to assume that the proposed project would include internal building lights, parking garage lights, security lights, external building lights, light poles around the park, and pathway lights. Due to the project site’s location and consistent with mitigation measure BIO-4.1, exterior lighting within the TESP area will be shielded as needed to block illumination from shining upward, or outward into the Guadalupe River and Ulistac Natural Area. Furthermore, the project will undergo architectural and site design review by the Community Development Director prior to issuance of building permits, consistent with mitigation measure BIO-4.1, to ensure that the project would not adversely impact bird species. As a result, the proposed project would not result in any new lighting impacts or substantially increase the severity of the previously identified impact.

3.3.2.3 *Trees*

For the purposes of this analysis, it is assumed that the project would remove all existing trees on-site. A Certified Tree Inventory was prepared by HMH Engineers in December 2021. A copy of this report is provided in Appendix C of this document. The trees are listed in Table 3.3-1 and are shown in Figure 3.3-1 below.

Tree No.	Scientific Name	Common Name	Diameter in Inches	Condition
1	<i>Platanus x hispanica</i>	London Plane	20.0	Good
2	<i>Platanus x hispanica</i>	London Plane	21.0	Good
3	<i>Platanus x hispanica</i>	London Plane	21.0	Good
4	<i>Platanus x hispanica</i>	London Plane	24.0	Good
5	<i>Platanus x hispanica</i>	London Plane	24.0	Good
6	<i>Platanus x hispanica</i>	London Plane	24.0	Good
7	<i>Platanus x hispanica</i>	London Plane	19.0	Good
8	<i>Platanus x hispanica</i>	London Plane	19.0	Good
9	<i>Platanus x hispanica</i>	London Plane	8.0	Moderate
10	<i>Platanus x hispanica</i>	London Plane	17.0	Good
11	<i>Platanus x hispanica</i>	London Plane	9.0	Good
12	<i>Fraxinus oxycarpa</i> 'Raywood'	Raywood Ash	21.0	Moderate
13	<i>Platanus x hispanica</i>	London Plane	18.0	Good
14	<i>Sequoia sempervirens</i>	Coast Redwood	40.0	Moderate
15	<i>Sequoia sempervirens</i>	Coast Redwood	43.0	Moderate
16	<i>Pyrus calleryana</i>	Callery Pear	11.0	Moderate
17	<i>Tristaniopsis laurina</i>	Water Gum	12.0	Moderate
18	<i>Tristaniopsis laurina</i>	Water Gum	9.0	Moderate

Table 3.3-1: Trees Surveyed On-Site

Tree No.	Scientific Name	Common Name	Diameter in Inches	Condition
19	<i>Platanus x hispanica</i>	London Plane	17.0	Good
20	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	15.0	Moderate
21	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	16.0	Moderate
22	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	18.0	Moderate
23	<i>Eucalyptus viminalis</i>	Manna Gum	25.0	Moderate
24	<i>Tristaniopsis laurina</i>	Water Gum	8.0	Good
25	<i>Tristaniopsis laurina</i>	Water Gum	8.0	Good
26	<i>Tristaniopsis laurina</i>	Water Gum	9.0	Good
27	<i>Tristaniopsis laurina</i>	Water Gum	9.0	Good
28	<i>Tristaniopsis laurina</i>	Water Gum	10.0	Good
29	<i>Tristaniopsis laurina</i>	Water Gum	9.0	Moderate
30	<i>Platanus x hispanica</i>	London Plane	20.0	Moderate
31	<i>Eucalyptus sideroxylon</i>	Red Ironbark	19.0	Moderate
32	<i>Eucalyptus viminalis</i>	Manna Gum	18.0	Moderate
33	<i>Eucalyptus viminalis</i>	Manna Gum	27.0	Moderate
34	<i>Eucalyptus viminalis</i>	Manna Gum	24.0	Moderate
35	<i>Eucalyptus sideroxylon</i>	Red Ironbark	24.0	Moderate
36	<i>Eucalyptus viminalis</i>	Manna Gum	30.0	Moderate
37	<i>Eucalyptus sideroxylon</i>	Red Ironbark	18.0	Moderate
38	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	12.0	Moderate
39	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	15.0	Moderate
40	<i>Acacia melanoxylon</i>	Black Acacia	16.0	Moderate
41	<i>Olea europaea</i>	Olive	5, 5, 4	Moderate
42	<i>Olea europaea</i>	Olive	9, 6	Moderate
43	<i>Zelkova serrata</i>	Japanese Zelkova	11.0	Moderate
44	<i>Zelkova serrata</i>	Japanese Zelkova	13.0	Moderate
45	<i>Zelkova serrata</i>	Japanese Zelkova	16.0	Moderate
46	<i>Washingtonia robusta</i>	Mexican Fan Palm	18.0	Poor
47	<i>Pyrus calleryana</i>	Callery Pear	15.0	Moderate
48	<i>Pyrus calleryana</i>	Callery Pear	8.0	Poor
49	<i>Pyrus calleryana</i>	Callery Pear	15.0	Moderate
50	<i>Pyrus calleryana</i>	Callery Pear	15.0	Moderate
51	<i>Pyrus calleryana</i>	Callery Pear	14.0	Moderate
52	<i>Pyrus calleryana</i>	Callery Pear	12.0	Moderate
53	<i>Pyrus calleryana</i>	Callery Pear	16.0	Moderate
54	<i>Pyrus calleryana</i>	Callery Pear	17.0	Moderate
55	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	20.0	Moderate
56	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	19.0	Moderate
57	<i>Pyrus calleryana</i>	Callery Pear	16.0	Moderate
58	<i>Sequoia sempervirens</i>	Coast Redwood	32.0	Moderate
59	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	7.0	Moderate
60	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	10.0	Moderate
61	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	10.0	Moderate
62	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	13.0	Moderate

Table 3.3-1: Trees Surveyed On-Site

Tree No.	Scientific Name	Common Name	Diameter in Inches	Condition
63	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	12.0	Moderate
64	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	14.0	Moderate
65	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	14.0	Moderate
66	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	15.0	Moderate
67	<i>Pyrus calleryana</i>	Callery Pear	10, 10	Moderate
68	<i>Pyrus calleryana</i>	Callery Pear	10, 9, 4	Moderate
69	<i>Tristaniopsis laurina</i>	Water Gum	9.0	Moderate
70	<i>Tristaniopsis laurina</i>	Water Gum	9.0	Moderate
71	<i>Pyrus calleryana</i>	Callery Pear	21.0	Good
72	<i>Pyrus calleryana</i>	Callery Pear	19.0	Moderate
73	<i>Sequoia sempervirens</i>	Coast Redwood	31.0	Moderate
74	<i>Sequoia sempervirens</i>	Coast Redwood	25.0	Moderate
75	<i>Pyrus calleryana</i>	Callery Pear	14.0	Moderate
76	<i>Pyrus calleryana</i>	Callery Pear	12.0	Moderate
77	<i>Sequoia sempervirens</i>	Coast Redwood	35.0	Moderate
78	<i>Pyrus calleryana</i>	Callery Pear	13.0	Moderate
79	<i>Pyrus calleryana</i>	Callery Pear	21.0	Moderate
80	<i>Platanus x hispanica</i>	London Plane	14.0	Moderate
81	<i>Tristaniopsis laurina</i>	Water Gum	9.0	Moderate
82	<i>Tristaniopsis laurina</i>	Water Gum	10.0	Moderate
83	<i>Tristaniopsis laurina</i>	Water Gum	12.0	Moderate
84	<i>Tristaniopsis laurina</i>	Water Gum	13.0	Moderate
85	<i>Platanus x hispanica</i>	London Plane	15.0	Moderate
86	<i>Sequoia sempervirens</i>	Coast Redwood	39.0	Moderate
87	<i>Sequoia sempervirens</i>	Coast Redwood	35.0	Moderate
88	<i>Platanus x hispanica</i>	London Plane	15.0	Moderate
89	<i>Platanus x hispanica</i>	London Plane	15.0	Moderate
90	<i>Tristaniopsis laurina</i>	Water Gum	10.0	Moderate
91	<i>Platanus x hispanica</i>	London Plane	20.0	Moderate
92	<i>Pyrus calleryana</i>	Callery Pear	12.0	Moderate
93	<i>Pyrus calleryana</i>	Callery Pear	17.0	Moderate
94	<i>Pyrus calleryana</i>	Callery Pear	17.0	Moderate
95	<i>Pyrus calleryana</i>	Callery Pear	14.0	Moderate
96	<i>Pyrus calleryana</i>	Callery Pear	17.0	Moderate
97	<i>Sequoia sempervirens</i>	Coast Redwood	23.0	Moderate
98	<i>Platanus x hispanica</i>	London Plane	10.0	Moderate
99	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	15.0	Moderate
100	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	19.0	Moderate
101	<i>Fraxinus oxycarpa 'Raywood'</i>	Raywood Ash	12.0	Moderate
102	<i>Eucalyptus viminalis</i>	Manna Gum	24.0	Moderate
103	<i>Eucalyptus viminalis</i>	Manna Gum	36.0	Moderate
104	<i>Eucalyptus viminalis</i>	Manna Gum	30.0	Moderate
105	<i>Tristaniopsis laurina</i>	Water Gum	9.0	Moderate
106	<i>Tristaniopsis laurina</i>	Water Gum	9.0	Moderate
107	<i>Tristaniopsis laurina</i>	Water Gum	10.0	Moderate

Table 3.3-1: Trees Surveyed On-Site

Tree No.	Scientific Name	Common Name	Diameter in Inches	Condition
108	<i>Tristaniaopsis laurina</i>	Water Gum	10.0	Moderate
109	<i>Tristaniaopsis laurina</i>	Water Gum	10.0	Moderate
110	<i>Tristaniaopsis laurina</i>	Water Gum	9.0	Moderate
111	<i>Platanus x hispanica</i>	London Plane	12.0	Moderate
112	<i>Eucalyptus viminalis</i>	Manna Gum	15.0	Moderate
113	<i>Eucalyptus viminalis</i>	Manna Gum	17.0	Moderate
114	<i>Eucalyptus viminalis</i>	Manna Gum	18.0	Moderate
115	<i>Eucalyptus viminalis</i>	Manna Gum	18.0	Moderate
116	<i>Schinus terebinthifolius</i>	Brazilian Pepper	4, 2	Poor
117	<i>Fraxinus oxycarpa</i> 'Raywood'	Raywood Ash	12.0	Moderate
118	<i>Pyrus calleryana</i>	Callery Pear	5.0	Moderate
119	<i>Platanus x hispanica</i>	London Plane	11.0	Moderate
120	<i>Pyrus calleryana</i>	Callery Pear	8.0	Moderate
121	<i>Sequoia sempervirens</i>	Coast Redwood	20.0	Moderate
122	<i>Fraxinus oxycarpa</i> 'Raywood'	Raywood Ash	11.0	Moderate
123	<i>Fraxinus oxycarpa</i> 'Raywood'	Raywood Ash	13.0	Moderate
124	<i>Fraxinus oxycarpa</i> 'Raywood'	Raywood Ash	13.0	Moderate
125	<i>Fraxinus oxycarpa</i> 'Raywood'	Raywood Ash	14.0	Moderate
126	<i>Platanus x hispanica</i>	London Plane	11.0	Moderate
127	<i>Fraxinus oxycarpa</i> 'Raywood'	Raywood Ash	16.0	Moderate
128	<i>Fraxinus oxycarpa</i> 'Raywood'	Raywood Ash	17.0	Moderate
129	<i>Fraxinus oxycarpa</i> 'Raywood'	Raywood Ash	14.0	Moderate
130	<i>Fraxinus oxycarpa</i> 'Raywood'	Raywood Ash	11.0	Moderate
131	<i>Fraxinus oxycarpa</i> 'Raywood'	Raywood Ash	8.0	Moderate
132	<i>Platanus x hispanica</i>	London Plane	8.0	Moderate
133	<i>Tristaniaopsis laurina</i>	Water Gum	9.0	Moderate
134	<i>Tristaniaopsis laurina</i>	Water Gum	9.0	Moderate
135	<i>Tristaniaopsis laurina</i>	Water Gum	9.0	Moderate
136	<i>Tristaniaopsis laurina</i>	Water Gum	10.0	Moderate
137	<i>Tristaniaopsis laurina</i>	Water Gum	12.0	Moderate
138	<i>Tristaniaopsis laurina</i>	Water Gum	10.0	Moderate
139	<i>Tristaniaopsis laurina</i>	Water Gum	8.0	Moderate
140	<i>Tristaniaopsis laurina</i>	Water Gum	8.0	Moderate
141	<i>Platanus x hispanica</i>	London Plane	20.0	Good
142	<i>Tristaniaopsis laurina</i>	Water Gum	9.0	Moderate
143	<i>Tristaniaopsis laurina</i>	Water Gum	9.0	Moderate
144	<i>Tristaniaopsis laurina</i>	Water Gum	11.0	Moderate
145	<i>Tristaniaopsis laurina</i>	Water Gum	11.0	Moderate



TREE LOCATION MAP

FIGURE 3.3-1

Consistent with mitigation measure BIO-10.2 and General Plan Policy 5.3.1-P10, any tree removed would be required to be replaced at a 2:1 ratio on-site. Assuming all 145 trees would be removed, the project would be required to plant a total of 290 new trees. Based on the plans provided by the applicant, the applicant proposes a total of 296 trees, which is consistent with the City's tree replacement requirement. As a result, the proposed project would not result in any new impacts or substantially increase the severity of the previously identified impact.

3.4 HAZARDS AND HAZARDOUS MATERIALS

The following analysis addresses the potential for soil and groundwater contamination on the project site. Given the age of the buildings in the TESP area, the TESP FEIR concluded that the buildings would likely contain asbestos and/or lead-based paint. Remediation of asbestos and lead-based paint must be in accordance with national regulatory guidelines and Cal/OSHA standards. The regulatory requirements are incorporated by reference and no further analysis is required.

Impacts on airport safety, schools, and emergency operation plans would be the same on all project sites within the TESP area given that the projects would have to be designed consistent with the development standards established by the TESP. The TESP FEIR found impacts to airport safety, schools, and emergency operation plans to be less than significant.

3.4.1 Findings of the Previously Certified FEIR

Based on the TESP FEIR, the project site historically consisted of agricultural land including row crops and orchards. One leaking underground storage tank (LUST) case was discussed in the TESP FEIR. In addition, four facilities within the TESP area have been identified in the Regional Water Quality Control Board's (Water Board's) Spills, Leaks, Investigations, and Cleanup (SLIC) database. Of the four on-site facilities, three are currently identified as open cases as discussed below.

Leaking Underground Storage Tank Cases

In 1988, a 2,000-gallon gasoline underground storage tank (UST) was removed from 2200 Calle De Luna. The LUST case has been closed by Santa Clara Valley Water District (SCVWD) as of 1995. The most recent sampling event found concentrations of total petroleum hydrocarbons as gasoline (TPHg) and benzene at the site.

Spills, Leaks, Investigations, and Cleanup (SLIC) Sites

In 1997, RWQCB closed the SLIC case at 2339 Calle Del Mundo, however, residual concentrations of volatile organic compounds (VOCs) remained in the soil and groundwater that pose a potential vapor intrusion concern. The VOC impacted groundwater appears to have migrated below the northerly adjacent landfill property.

VOCs were identified in the groundwater at 2301 Calle De Luna and have migrated below the easterly adjacent parcel at 2281 Calle De Luna. This open SLIC case is currently being overseen by the RWQCB.

The two remaining SLIC cases at 2278 Calle De Luna (Coatek, Inc.) and 2200 and 2222 Calle De Luna (Air Flight Service) are being overseen by the Santa Clara County Department of

Environmental Health (SCCDEH). The Air Flight Service property was found to have elevated levels of TPH as diesel (TPHd) that are unrelated to the prior film processing done on the property. The Coatek, Inc. property was found to have elevated nickel and copper concentrations related to the industrial land use activities on the southern portion of the TESP area. Oil, grease, trichloroethene (TCE), TPH as motor oil (TPHmo), hexavalent chromium, and benzene concentrations were also found to be elevated above residential screening levels. Both facilities have entered into Voluntary Cleanup Agreements with SCCDEH.

All Purpose Landfill

The former Santa Clara All Purpose Landfill (landfill) is a closed municipal landfill with a footprint of approximately 136 acres located adjacent to the TESP area. Portions of the landfill have been converted into a public golf course, and the remainder is open space. The landfill consists of four parcels: 1, 2, 3/6, and 4. Parcel 2 is located adjacent to the north of the TESP area and Parcel 4 is across Lafayette Street to the west. Parcels 1 and 3/6 are located further to the north and northwest.

Groundwater beneath the landfill, primarily on Parcel 4, is impacted with VOCs. The primary VOCs detected in groundwater samples collected during the first quarter of 2016 were 1,1 dichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene, TCE, and vinyl chloride. The area of VOC impacted on Parcel 4 is located cross-gradient from the site with respect to groundwater flow direction (northeast) and did not migrate below the site. Two groundwater monitoring wells are located on the southern border of the landfill (Parcel 2) and immediately north of the TESP area. Low concentrations of VOCs have been detected in ground water from both monitoring wells, one of which is located down-gradient of 2339 Calle Del Mundo, an identified SLIC site discussed above. Landfill gas investigations were conducted at the landfill and identified several VOCs in landfill gas. Benzene, ethylbenzene, and vinyl chloride were reported in landfill gas at concentrations exceeding residential and commercial Environmental Screening Levels (ESLs).

Given the industrial use of the site and prior agricultural uses and LUST case, residual hazardous materials contamination is anticipated to be present on-site and could impact construction workers and adjacent land uses if disturbed during demolition or construction. The following mitigation measures are included in the TESP FEIR.

Impact HAZ-1: Existing hazardous materials contamination in soils and groundwater on the site has the potential to impact construction workers and adjacent land uses if disturbed during demolition or construction of new buildings and structures on the site.

MM HAZ-1.1: Prior to the start of any demolition or construction activity, a property-specific Phase I Environmental Site Assessment (ESA) shall be completed in accordance with American Society for Testing and Materials (ASTM) Standard Designation E 1527-13 (or most recent version) to identify Recognized Environmental Conditions, evaluate the property history, and establish if the property is likely to have been impacted by chemical releases. Soil, soil vapor and/or groundwater quality studies shall subsequently be conducted, if warranted based on the findings on the property-specific Phase I ESAs to evaluate if mitigation measures are needed to protect the health and

safety of site occupants. All site mitigation measures identified in the property-specific Phase I and II ESAs shall be completed under the oversight of an appropriate regulatory agency, such as the Department of Environmental Health (DEH), Department of Toxic Substances Control (DTSC), or RWQCB. Any required cleanup/remediation of the site during development activities shall meet all applicable federal, state and local laws, regulations, and requirements. The project applicant shall provide the appropriate oversight agency's written approval of the site mitigation measures to the City of Santa Clara prior to the issuance of a demolition and/or grading permit.

MM HAZ-1.2: At properties where VOCs are identified as contaminants of concern (COC), the potential for vapor intrusion shall be evaluated. A Vapor Intrusion Investigation Work Plan shall be submitted to the overseeing regulatory agency for review and approval. The plan shall include soil vapor sampling for VOCs in areas of concern. The soil vapor sampling shall be conducted in conformance with DTSC's July 2015 advisory titled *Active Soil Gas Investigations*. A minimum of two soil vapor sampling events (with soil vapor concentrations less than the most conservative residential or commercial screening levels – as appropriate) is required to document that mitigation measures are not required; additional sampling events may be required by the overseeing regulatory agency.

MM HAZ-1.3: The need for vapor intrusion mitigation measures will be dependent upon the planned building design and the results of the Vapor Intrusion Investigation. Prior to redevelopment of the site, a report assessing the potential for vapor intrusion shall be submitted to and approved by the overseeing regulatory agency. The assessment shall be conducted in general conformance with DTSC's *Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)* dated October 2011.

MM HAZ-1.4: Prior to the start of any construction activity on properties with known COC exceeding the lower of the then-current DTSC, the RWQCB or Environmental Protection Agency (EPA) residential screening levels, the project proponent shall submit the following plans to the overseeing regulatory agency for review and approval:

- *Corrective Action Plan.* An appropriate corrective action plan (e.g. remedial action plan, removal action workplace, etc.) shall be prepared that reflects the results of the above investigations. Site cleanup levels presented in the plan shall be based on a target cancer risk of 0.00001 or, for non-carcinogens, a target hazard quotient (THQ) of 1.0. The lower of the then-current DTSC, RWQCB, or EPA residential screening levels shall be used to interpret the TR and THQ levels or, alternatively, a site-specific human health risk assessment shall be prepared and approved by the overseeing regulatory agency. Higher cleanup goals may be acceptable, if approved in writing by the oversight agency. The project

applicant shall provide an oversight agency's written approval of the corrective action plan to the City of Santa Clara prior to issuance of a demolition and/or grading permit. Leaving contaminated soil (above residential screening levels and, for metals, above background concentrations) in-place or re-using contaminated soil shall require the oversight agency's written approval. At a minimum, if contaminated soil is left in-place, a deed restriction or land use covenant shall detail the location of the soil. This document shall include a surveyed map of the location of the impacted soil and shall restrict future excavation in the impacted area unless approved in writing by an oversight agency.

- *Air Monitoring Plan.* This plan shall assess the potential for exposure of construction workers and neighboring occupants adjoining the property to COCs during construction activities; this plan shall specify measures to be implemented if COC concentrations exceed threshold values.
- *Vapor Intrusion Mitigation Plan and Associated Documents.* If the Vapor Intrusion Investigation identifies the need for mitigation measures, a Vapor Intrusion Mitigation Plan shall be prepared that describes the measures to be a result of vapor intrusion. The Vapor Intrusion Mitigation Plan will require the project applicant to design the proposed occupied spaces with appropriate structural and engineering features to reduce risk of vapor intrusion into buildings. At a minimum, this design shall include: 1) passive sub-slab ventilation with a spray applied vapor barrier (and with the ability to convert the system from passive to active ventilation), 2) monitoring to ensure the long-term effectiveness of the remedy, and 3) the implementation of institutional controls. Other designs would be acceptable is approved in writing by the overseeing regulatory agency. The Vapor Intrusion Mitigation Plan shall be submitted for agency review and approval. DTSC's October 2011 *Vapor Intrusion Mitigation Advisory* provides useful guidance in selecting, designing, and implementing appropriate response actions for sites where a potential vapor intrusion risk has been identified. A completed report shall be submitted to the overseeing regulatory agency upon completion of construction of the mitigation system. The report shall document installation of the vapor control measures identified in the Vapor Intrusion Mitigation Plan and present final as-built design drawings. A Long-Term Operations, Maintenance, and Monitoring Plan (OMMP) also shall be submitted for agency approval that presents the actions to be taken following construction to maintain and monitor the vapor intrusion mitigation system, and a contingency plan should the vapor mitigation system fail. A financial assurance mechanism shall additionally be established (i.e. proof that adequate funds are available for long-term maintenance and monitoring of the vapor intrusion mitigation system) and described in the OMMP.

MM HAZ-1.5:

A Site Management Plan (SMP) and Health and Safety Plan (HSP) shall be developed to establish appropriate management practices for handling and monitoring of impacted soil, soil vapor, and groundwater that potentially may be encountered during construction activities. The SMP shall be prepared by an Environmental Professional and be submitted to the overseeing regulatory agency (e.g. RWQCB, DTSC and/or DEH) for review and approval prior to commencing construction activities. The SMP also shall be provided to the City of Santa Clara. Prior to the start of any construction activity that involves below ground work (i.e. mass grading, foundation construction, excavating or utility trenching), information regarding site risk management procedures, including copies of the HSP and SMP, shall be provided to the contractors for their review, and each contractor shall provide such information to its subcontractors. The SMP and HSP measures shall be incorporated into the project design documents:

- Site control procedures to control the flow of personnel, vehicles and materials in and out of the site;
- Measures to minimize dust generation, stormwater runoff and tracking of soil off-site;
- Protocols for conducting earthwork activities in areas where impacted soil, soil vapor and/or groundwater are present or suspected. Worker training requirements, health and safety measures and material handling procedures shall be described;
- Perimeter air monitoring for dust during any activity that significantly disturbs impacted site soil (i.e. mass grading, foundation construction, excavating or utility trenching) to document the effectiveness of dust control measures;
- Protocols to be implemented if buried structures, wells, debris, or unidentified areas of impacted soil are encountered during site development activities;
- Protocols to characterize/profile soil suspected of being contaminated so appropriate mitigation, disposal or reuse alternatives, if necessary, can be implemented. Soil in contact with impacted groundwater shall be assumed contaminated. All soil excavated and transported from this site shall be appropriately disposed of at a permitted facility;
- Stockpiling protocols for “clean” and “impacted” soil;
- Decontamination procedures to reduce the potential for construction equipment and vehicles to release contaminated soil onto public roadways or other off-site transfer;
- Procedures to evaluate and document the quality of any soil imported to the site. Soil containing chemicals exceeding residential (unrestricted use) screening levels or typical background concentrations of metals shall not be accepted. The DTSC’s Clean Fill Advisory (October 2001 or latest version) provides useful guidance on evaluating imported fill;
- Methods to monitor excavations and trenches for the potential presence of VOC impacted vapors. Mitigation protocols shall be developed and implemented in the event elevated VOC vapors are released during

excavation activities that may pose a risk to construction worker health and/or risk to the health of occupants of neighboring properties;

- Protocols to evaluate if the residual contaminants will adversely impact the integrity of below ground utility lines and/or structures (i.e. the potential for corrosion due to subsurface contamination)
- Measures to reduce soil vapor and groundwater migration through trench backfill and utility conduits. Such measures shall include placement of low-permeability backfill “plugs” at specified intervals on-site and at all locations where the utility trenches (within impacted soil or groundwater) extend off-site. In addition, utility conduits that are placed below groundwater shall be installed with water-tight fittings to reduce the potential for groundwater to migrate into the conduits.
- Measures to help reduce the potential for the downward migration of contaminated groundwater if deep foundation systems are proposed. These measures shall be identified in the geotechnical investigation report and implemented as part of the development plans.

MM HAZ-1.6:

The project applicant’s environmental professional shall assist in the implementation of the SMP and shall, at a minimum, perform part-time observation services during demolition, excavation, grading and trenching activities. Upon completion of construction activities, the environmental professional shall prepare a report documenting compliance with the SMP; this report shall be submitted to the oversight regulatory agency and the City of Santa Clara.

With implementation of the identified measures, development under the TESP would have a less than significant impact related to soil and groundwater contamination.

3.4.2 Hazards and Hazardous Materials Impacts Resulting from the Proposed Project

The project site is currently developed with five light industrial buildings and accessory structures totaling approximately 191,812 square feet. The proposed project would demolish the existing buildings and structures on-site and construct two residential buildings with a combined total of 950 dwelling units.

Groundwater on-site has been encountered between seven to 15 feet below the ground surface (bgs). Groundwater in the area flows to the northeast. Fluctuations in the groundwater level may occur due to seasonal changes, variations in rainfall, and underground drainage patterns.

As mentioned previously, there are four facilities within the TESP area listed on the SLIC database. Of the four, three facilities are currently identified as open cases. The on-site facility located at 2200 Calle De Luna is listed as a closed LUST case and the other on-site facility at 2220 and 2222 Calle De Luna is currently being overseen by the SCCDEH.

Consistent with mitigation measures HAZ-1.1, a Phase I Environmental Site Assessment (ESA) was prepared by Cornerstone Earth Group, Inc. in November 2022. A copy of the report is provided as Appendix D of this document.

On-Site Sources of Contamination

The on-site facility at 2121 Tasman Drive is listed on the Facility and Manifest Data (HAZNET) database for the off-site disposal of inorganic solid waste in 2002. The on-site facility at 2220 Calle De Luna is listed in the California Environmental Reporting System (CERS) and HAZNET databases for generation of hazardous wastes (e.g., metal sludge with metals, and other inorganic solid waste) and in the CA Haulers as a registered waste tire hauler. The on-site facility at 2222 Calle De Luna is listed on the HAZNET, Resource and Recovery Act Small Quantity Generator (RCRA SQG), and Hazardous Waste Tracking System (HWTS) databases for off-site disposal of aged or surplus organics, laboratory waste chemicals, waste oil, and mixed oil and as a small quantity generator of hazardous waste. The updated Phase I ESA prepared for the proposed project identified the 2220 and 2222 Calle De Luna site as an open-inactive case on the Water Board's Cleanup Program Site (CPS) database which is discussed further below.

2220 and 2222 Calle De Luna

A Phase I ESA, prepared by Langan Treadwell Rollo (Langan) in 2015, stated that the business occupying the 2220 Calle De Luna building processed photographs and film in a photo lab for several years along the northeastern portion of the building. In the 2015 Phase I ESA, Langan mentioned that the project site had a former address of 2200 Calle De Luna and that the former occupant operated a 2,000-gallon gasoline UST. Based on Cornerstone's review of the LUST files, Cornerstone concluded that the 2,000-gallon gasoline UST and former occupant were not located on-site and that it was located off-site, immediately north of 2220 Calle De Luna, at 2200 Calle De Luna.

Based on Cornerstone's review of the Santa Clara Building Department permit records, two fuel dispensers were installed on-site near the southwestern corner of the 2220 Calle De Luna building in 1979 and are discussed in detail below. While no UST removal reports were found, a UST removal permit was issued by the Santa Clara Fire Department in 1986. Soil, soil vapor, and groundwater samples were collected in July and August 2015 to identify potential impacts from the photographic processing lab and at the location of the 2,000-gallon gasoline UST. While the site of the 2,000-gallon gasoline UST was incorrectly identified by Langan as being on-site, the samples collected were near an existing on-site fuel dispenser island.⁶ TPHd was identified in the groundwater along the eastern portion of 2220 and 2222 Calle De Luna at levels exceeding the Water Board's ESL for groundwater TPHd. In addition, concentrations of benzene and tetrachloroethylene (PCE) were identified which exceeded the current residential ESLs associated with vapor intrusion. In 2015, the property owner entered into a Remedial Action Agreement with the SCCDEH for future mitigation activities (if required) during redevelopment of the site. Per the Remedial Action Agreement, the SCCDEH stated that a discharge of waste occurred on-site which requires further characterization potential remediation.

Agricultural Use

As mentioned in *Section 3.4.1*, the site was used for agricultural purposes. Soil samples were collected from the 2121 Tasman Drive parcel in 1991 which detected low levels of pesticides.

⁶ The samples collected are presumed to be in the general vicinity of the former on-site USTs; however, the specific sample locations are not known.

Additionally, soil samples were collected in 2015 and 2020 at the 2200 Calle De Luna site which found concentrations of arsenic and lead in soil. Based on Cornerstone’s review of aerial photographs, portions of the project site may have been part of the same agricultural property as the 2200 Calle De Luna site. Therefore, there is potential that residual pesticides are present on-site.

Off-Site Sources of Contamination

The Phase I ESA mentioned three off-site facilities at 2200, 2278, and 2221-2251 Calle De Luna with potential contamination concerns as discussed below.

2200 Calle De Luna

As discussed in Section 3.4.1, the off-site facility at 2200 Calle De Luna is listed as a closed LUST case. Based on the 2022 Phase I ESA, 2200 Calle De Luna site is also listed as an open case on the CPS database. Soil sampling was completed in 2015 and 2020 which identified concentrations of arsenic and lead in the soil. Soil vapor sampling was completed in March 2022 which identified VOCs at concentrations exceeding their respective ESLs. In 2022, the property owner entered into a Remedial Action Agreement with the SCCDEH and soil, soil vapor, and groundwater evaluations and coordination with the SCCDEH are ongoing.

2278 Calle De Luna

The off-site facility at 2278 Calle De Luna is listed as a closed case in the CPS database and was previously occupied by various light industrial businesses which used coolants, lubricants, oils, cleaners, heavy metals, acids, bases, cyanides, and other chemicals. As discussed in Section 3.4.1, the off-site property was found to have elevated nickel and copper concentrations while nickel, oil, grease, and TCE concentrations were identified above the Water Board’s ESLs during a 1995 groundwater sampling event.

Additional soil and groundwater samples were collected in 2016 and analyzed for Potential Constituents of Concern (PCOCs) including TPHd and TPHmo, VOCs, and semi-VOCs, organochlorine pesticides (OCPs), CAM 17 metals, hexavalent chromium (CRVI), cyanide, and potential hydrogen (pH). Based on the results of the 2016 sampling, no additional investigation activities at this site were recommended. In September 2016, the property owner entered into a Voluntary Cleanup agreement with the SCCDEH for oversight of future property assessment activities and mitigation, if required.

In 2018, soils with cyanide concentrations were excavated for off-site disposal under SCCDEH oversight. A completion report was submitted to the SCCDEH and the SCCDEH issued a case closure letter in November 2018. The case closure letter noted that residual contamination remains at the property and required that notification be provided prior to any changes in land use, grading activities, excavation, construction dewatering, and installation of water wells.

This site is currently being redeveloped into a mixed-use development. As required by the closure letter, the SCCDEH was notified of the planned land use in April 2022. The SCCDEH recommended that the property submit a new application for regulatory oversight.

2221-2251 Calle De Luna

The off-site facility at 2221-2251 Calle De Luna and 2232-2246 Calle Del Mundo are listed as an open case in the CPS database. Soil samples, sub slab soil vapor samples, deeper soil vapor samples, and groundwater samples were collected from the site in 2019 and 2020 to analyze potential impacts from former uses. Based on the samples collected, VOCs including TCE were identified in the groundwater. In 2021, the property owner entered into a voluntary oversight agreement with the Water Board for redevelopment of the site and additional soil vapor and groundwater sampling was collected from the site. VOC concentrations in soil vapor and groundwater were found to exceed the Water Board's ESLs and a Vapor Intrusion Mitigation System (VIMS) design summary was prepared and approved by the Water Board in 2022. An SMP was also prepared and approved by the Water Board in June 2022.

Consistent with the findings of the TESP FEIR, the proposed project would be required to implement mitigation measures HAZ-1.1 to HAZ-1.6 to ensure that the proposed development would not exacerbate any potentially existing hazardous materials contamination in the TESP area. The proposed project would not result in new or more substantive hazardous materials impacts than were previously identified in the TESP FEIR.

3.5 HYDROLOGY AND WATER QUALITY

The following analysis addresses the projects consistency with the Municipal Regional Stormwater NPDES Permit (MRP).

Because the proposed project is consistent with the development assumptions in the TESP FEIR, water quality impacts from construction would be consistent with the conclusions of the FEIR. Furthermore, the project would be consistent with the findings of the FEIR regarding groundwater, drainage, and inundation hazards. No further discussion of these issues is provided.

3.5.1 Findings of the Previously Certified FEIR

3.5.1.1 *Post-Construction Stormwater Treatment*

The TESP FEIR states that all projects within the TESP area are required to comply with the MRP and C.3 stormwater treatment regulations. The TESP FEIR concluded that compliance with regulatory requirements would result in a less than significant water quality impact.

3.5.2 Hydrology and Water Quality Impacts Resulting from the Proposed Project

3.5.2.1 *Post-Construction Stormwater Treatment*

The MRP requires all post-construction stormwater runoff to be treated by numerically sized low-impact development (LID) treatment controls unless the project is granted Special Project LID Reduction Credits, which would allow the project to implement non-LID measures for all or a portion of the site depending on the project characteristics.

The proposed project would qualify for 100 percent LID reduction credit and proposes bioretention basins and flow-through planters to treat stormwater runoff. Consistent with the TESP FEIR, the proposed project would comply with the MRP. The final stormwater control plan shall be reviewed

and approved by the City at the development permit stage. Therefore, the proposed project would not result in any new impacts or substantially increase the severity of the previously identified hydrology and water quality impacts.

3.6 NOISE

The following analysis addresses the potential operational noise impacts that would result from the proposed project. Because the project is consistent with the development assumptions in the TESP FEIR, construction noise and vibration would be consistent with the conclusions of the FEIR and all identified mitigation measures would be required and are incorporated by reference. No further discussion of construction noise and vibration is provided.

Operational noise issues pertaining to mechanical equipment, traffic noise, and aircraft noise was found to be less than significant in the TESP FEIR. Because the project is consistent with the development assumptions in the TESP FEIR, the proposed project would also have a less than significant impact. No further analysis is required.

3.6.1 Findings of the Previously Certified FEIR

With limited exceptions like airport noise, CEQA does not address the effects of existing environmental conditions on a project. The TESP FEIR analyzed aircraft noise as a CEQA impact and concluded that the impact would be less than significant, as the anticipated noise levels would be compatible with the proposed land uses with respect to the guidelines set forth in the Airport Master Plan. Since the proposed project is located within the TESP area and is consistent with the development projections in the TESP FEIR, the project's aircraft noise impacts would also be less than significant. For noise from sources other than aircraft, the City of Santa Clara addressed the effect of existing noise sources on future residents in the TESP area as a planning consideration.

The predominant sources of noise that affect the noise environment within the TESP area and at nearby land uses results primarily from vehicular traffic along Lafayette Street and Tasman Drive. Traffic along the local streets within the TESP area, which include Calle Del Mundo and Calle De Luna, also affect the ambient noise environment. Aircraft associated with Norman Y. Mineta San José International Airport and trains passing along the Lick Mill Light Rail Transit Station and Great America Station also contribute to the noise environment in the area. Levi's Stadium, approximately 1,175 feet away from the project area, periodically contributes to the noise environment during large events such as NFL games and concerts. Based on findings from the 2009 Stadium FEIR⁷, residences within 2,000 feet of the stadium would experience elevated exterior noise levels during events which would result in an unavoidable significant impact.

Future Exterior Noise Levels

Based on the long-term measurements made within the TESP area, future exterior noise levels would be 70 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) along Tasman Drive, 74 dBA CNEL along Lafayette Street, and up to 67 dBA CNEL along the future Lick Mill Boulevard extension. Residential development proposed along these roadways would be incompatible with noise levels established for residential outdoor activity areas. Additionally, the TESP includes open

⁷ City of Santa Clara. *49ers Stadium Project FEIR*. November 2009.

space areas through a distributed non-contiguous park system. Open space areas within the center of the TESP area could be as close as approximately 243 feet from Lafayette Street and 216 feet from Tasman Drive. At a distance of 243 feet from Lafayette Street, noise levels at a neighborhood park would be expected to be 64 dBA CNEL (without building shielding). At a distance of 216 feet from Tasman Drive, noise levels at a neighborhood park would be approximately 64 dBA CNEL (without building shielding). These levels would be below the 65 dBA CNEL threshold (refer to Table 4.14-5 of the Santa Clara General Plan FEIR).

The following conditions of approval were included in the TESP FEIR to reduce exterior noise levels at common outdoor activity areas consistent with the City's General Plan:

- Do not locate common outdoor activity areas immediately adjacent to Tasman Drive, Lafayette Street, or the future Lick Mill Boulevard extension.
- Utilize site planning by placing outdoor activity areas in courtyards, on shielded podium levels (sky gardens) or rooftops, or behind buildings adjoining Tasman Drive, Lafayette Street, and Lick Mill Boulevard. Development adjacent to existing and planned open space shall be designed to provide shielding of the open space from Tasman Drive, Lafayette Street, and Lick Mill Boulevard.

Future Interior Noise Levels

The City of Santa Clara requires that interior noise levels be maintained at 45 dBA CNEL or less for residences. Interior noise levels would vary depending upon the design of the buildings (relative window area to wall area) and the selected construction materials and methods. Standard residential construction provides approximately 15 dBA of exterior to interior noise reduction, assuming the windows are partially open for ventilation. Standard construction with the windows closed provides approximately 20 to 25 dBA of noise reduction in interior spaces. Where exterior noise levels range from 60 to 65 dBA CNEL, the inclusion of adequate forced-air mechanical ventilation is often the method selected to reduce interior noise levels to acceptable levels by closing the windows to control noise. Where noise levels exceed 65 dBA CNEL, forced-air mechanical ventilation systems and sound-rated construction methods are normally required. Such methods or materials may include a combination of smaller window and door sizes as a percentage of the total building façade facing the noise source, sound-rated windows and doors, sound rated exterior wall assemblies, and mechanical ventilation so windows may be kept closed at the occupant's discretion.

According to the TESP FEIR, sound levels would range from 72 to 74 dBA CNEL at a distance of 50 feet from the southern and western border of the TESP area. Future interior noise levels at the plan area would be up to 55 dBA CNEL, exceeding the 45 dBA CNEL threshold of the Santa Clara General Plan. The TESP FEIR includes the following conditions of approval to reduce interior noise levels to 45 dBA CNEL or less:

- Assuming a conservative estimated ratio of 30 percent windows/doors to total wall area, preliminary calculations indicate that the facades of high-density residential buildings having line-of-sight to Lafayette Street would require windows and doors with a minimum STC rating of 30 to meet the interior noise threshold established by the City.

- Along the façades having direct line-of-sight to Tasman Drive and Lick Mill Boulevard, the minimum required Sound Transmission Class (STC) rating for windows and doors would be 26.
- Provide a suitable form of forced-air mechanical ventilation, as determined by the Community Development Director, for all residential units in the plan area so that windows can be kept closed at the occupant’s discretion to control interior noise and achieve the interior noise standards.
- A qualified acoustical consultant shall review the final site plans, building elevations, and floor plans of the proposed residential buildings and make recommendations for noise insulation to reduce interior noise levels to 45 dBA CNEL or less. Treatments would include, but are not limited to, forced-air mechanical ventilation systems, sound-rated wall and window constructions, acoustical caulking, protected ventilation openings, etc. The specific determination of what noise insulation treatments are necessary shall be conducted during final design of the project. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City, along with the building plans and approved design, prior to issuance of a building permit.

3.6.2 Noise Impacts Resulting from the Proposed Project

In December 2022, Illingworth & Rodkin, Inc. prepared an Interior Noise Assessment for the proposed project. A copy of this report is provided in Appendix E.

3.6.2.1 *Exterior Noise Levels*

Future noise levels along Calle De Luna, the future Lick Mill Boulevard extension, and Tasman Drive were calculated as part of the TESP Traffic/Construction Noise Update Memorandum.⁸ At a distance of 50 feet from the southern border of the TESP area, noise levels are expected to be up to 72 dBA CNEL. Noise levels are expected to range from 62 to 67 dBA CNEL throughout the remainder of the site due to vehicular traffic along Calle De Luna, Calle Del Mundo, and the future Lick Mill Boulevard extension, as well as aircraft associated with Norman Y. Mineta San José International Airport.

The project site would be subject to noise generated primarily by vehicular traffic along Tasman Drive and the light rail along Tasman Drive. The worst-case noise exposure would occur along the southern building façades, approximately 90 to 200 feet from the Tasman Drive centerline and the light rail. At these distances, future exterior noise levels would range from 66 to 69 dBA CNEL. Where exterior noise levels range from 60 to 65 dBA CNEL, adequate forced-air mechanical ventilation can reduce interior noise levels to acceptable levels by allowing occupants the option of closing the windows to reduce noise. Where noise levels exceed 65 dBA CNEL, adequate forced-air mechanical ventilation systems and sound-rated construction methods (e.g., a combination of smaller window and door sizes as a percentage of the total building façade facing the noise source, sound-rated windows and doors, sound-rated exterior wall assemblies, and/or mechanical ventilation) would be required.

⁸ Illingworth & Rodkin, Inc. *Tasman East SEIR Traffic/Construction Noise Update Memo*. December 2, 2022.

As proposed, both buildings would include private balconies. Per the TESP FEIR, private terraces or balconies within mid/high density residential developments are not typically considered sensitive to exterior noise levels. Consistent with the conditions of project approval included in the TESP FEIR, the proposed outdoor activity areas would not be located in proximity to Tasman Drive or the future Lick Mill Boulevard extension. These outdoor activity areas would be shielded by the proposed buildings. Therefore, the project would meet the City's noise standards and would be consistent with the findings of the TESP FEIR.

3.6.2.2 Interior Noise Levels

Standard residential construction provides approximately 15 dBA of exterior to interior noise reduction, assuming the windows are partially open for ventilation. Standard construction with the windows closed provides approximately 20 to 25 dBA of noise reduction in interior spaces.

Consistent with the conditions of project approval in the TESP FEIR, the proposed site plan and building elevations were reviewed and interior noise levels from exterior noise sources were calculated by Illingworth & Rodkin, Inc. to determine the necessary building treatments to meet the City's interior noise standard. To maintain a habitable interior environment, all dwelling units should be mechanically ventilated so that windows and doors can be kept closed at the occupant's discretion. The following noise insulation features shall be incorporated, as conditions of project approval, to reduce interior noise levels to meet the City's interior noise threshold.

Conditions of Project Approval:

- The southern façades of Buildings 4A and 4B shall have windows and doors with a minimum STC rating of 32.
- The remaining façades shall have windows and doors with a minimum STC rating of 28.
- A suitable form of force-air mechanical ventilation, as determined by the local building official, shall be provided to all residential units on-site so that windows can be kept closed at the occupant's discretion.
- If substantive changes are made to the design of the project prior to building department submittal, a qualified acoustical consultant shall confirm the noise insulation recommendations based on the final site plans, building elevations, and floor plans of Buildings 4A and 4B. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City, along with the building plans and approved design, prior to issuance of a building permit.

With implementation of the conditions of project approval identified above, the proposed project would meet the City's interior noise standards.

3.7 CONCLUSION

Based on the above analysis and discussion, no substantive revisions are needed to the TESP FEIR, because no new significant impacts or impacts of substantially greater severity would result from the proposed project. There have been no changes in circumstance in the project area that would result in new significant environmental impacts or substantially more severe impacts, and no new information has come to light that would indicate the potential for new significant impacts or substantially more severe impacts than were discussed in the TSEP FEIR. Therefore, no further evaluation is required,

and no Subsequent EIR is needed pursuant to Public Resources Code Section 21166. Consequently, this project is eligible for the statutory exemption to CEQA review under Government Code Section 65457.

APPENDICES

Appendix A: Construction Air Quality and Health Risk Assessment

Appendix B: Avian Collision Risk Assessment

Appendix C: Certified Tree Inventory

Appendix D: Phase I Environmental Site Assessment and Appendices

Appendix E: Interior Noise Assessment