

Freedom Circle Focus Area Plan/Greystar General Plan Amendment MMRP

Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<i>AESTHETICS</i>				
Impact 4-1: Effects on Scenic Vistas—Plan Area	LS	N/A	N/A	N/A
Impact 4-2: Effects on Scenic Vistas—Greystar Project	LS	N/A	N/A	N/A
Impact 4-3: Impacts on Existing Visual Character and Quality—Plan Area. New development throughout the Plan Area could include a combination of residential, retail, office, and open space uses. New uses could include combinations of, for example, residential, retail, restaurant, and office uses in single or mixed-use buildings. The Freedom Circle Focus Area Plan is, by definition, a generalized plan. As stated in the General Plan, a comprehensive planning study is required for future focus areas, which would include, among other items, "...appropriate design guidelines for private development, public facilities, streetscapes and transitions to adjacent land uses" (Prerequisite Policy 5.1.1-P8). Although the Focus Area Plan includes goals and policies intended to provide direction for minimizing visual impacts from future development, these general goals and policies lack the detail and enforceability that would be	S	Mitigation 4-3. As required by the City of Santa Clara General Plan, the City shall prepare a future comprehensive planning study for the Freedom Circle Focus Area Plan (whether a specific plan or another type of plan) and it shall include the following performance and design standards and guidelines that apply to all future individual development proposals in the Plan Area to minimize visual impacts by: (a) those enhancing form and design in the Plan Area; (b) those incorporating land use densities and associated changes in intensity consistent with the General Plan; (c) those encouraging street trees and landscaping along corridors to beautify the streetscape; (d) those coordinating signage color, shape, and graphic styles with the City's signage system; (e) those including standards to ensure compatibility of new development with nearby existing and planned development; (f) those establishing standards related to building form, mass, and scale that enhance the	City	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
included in the comprehensive planning study, and therefore present potential conflicts with applicable General Plan policies governing scenic quality. This represents a potentially significant impact .		pedestrian realm and provide transitions to adjacent lower-density development and public spaces; (g) those including guidelines and standards for pedestrian amenities; and (h) those fostering site design so that building height and massing would not overshadow new parks and plazas and/or interfere with solar collectors. Incorporation of such performance and design standards and guidelines in the required comprehensive planning study for the Plan Area would minimize conflicts with General Plan policies pertaining to visual character. Therefore, implementation of this mitigation would reduce this impact to a less-than-significant level .		
Impact 4-4: Impacts on Existing Visual Character and Quality—Greystar Project	LS	N/A	N/A	N/A
Impact 4-5: Project Light and Glare Effects—Plan Area	LS	N/A	N/A	N/A
Impact 4-6: Project Light and Glare Effects—Greystar Project	LS	N/A	N/A	N/A
<i>AIR QUALITY</i>				
Impact 5-1: Conflict with 2017 Clean Air Plan – Freedom Circle Focus Area Plan	LS	N/A	N/A	N/A

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Impact 5-2: Conflict with 2017 Clean Air Plan – Greystar General Plan Amendment	LS	N/A	N/A	N/A
Impact 5-3: Result in a Cumulatively Considerable Net Increase in Criteria Pollutants for which the Region is Non-Attainment – Freedom Circle Focus Area Plan. Implementation of the Freedom Circle Focus Area Plan could result in growth in the Plan Area that exceeds the level of growth accounted for in the City’s General Plan and, therefore, could generate a cumulatively considerable net increase in criteria air pollutants for which the region is in non-attainment. This represents a <i>potentially significant impact</i> .	S	<p>Mitigation Measure 5-3A: Implement BAAQMD Basic Construction Mitigation Measures. The City shall require new development projects occurring under implementation of the Freedom Circle Focus Area Plan to implement the BAAQMD’s Basic Control Mitigation Measures to address fugitive dust emissions that would occur during earthmoving activities associated with project construction. These measures include:</p> <ol style="list-style-type: none"> 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. 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. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid 	City; Individual project applicants	SU

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		<p>as soon as possible after grading unless seeding or soil binders are used.</p> <p>6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.</p> <p>7. 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.</p> <p>8. Post a publicly visible sign with the telephone number and person to contact at the City 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.</p>		
		<p>Mitigation Measure 5-3B: Require a Project-level Construction Assessment for New Development Proposed Under Implementation of the Freedom Circle Focus Area Plan. The City shall require applicants to</p>	<p>City; Individual project applicants</p>	<p>SU</p>

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		<p>submit a quantitative project-level construction criteria air pollutant and toxic air contaminant emissions analysis for future development proposed under implementation of the Freedom Circle Focus Area Plan. The estimated construction criteria air pollutant and toxic air contaminant emissions shall be compared against the thresholds of significance maintained by the Bay Area Air Quality Management District (BAAQMD) and, if emissions are shown to be above BAAQMD thresholds, the City shall require the implementation of mitigation to reduce emissions below BAAQMD thresholds or to the maximum extent feasible. Mitigation measures to reduce emissions could include, but are not limited to:</p> <ul style="list-style-type: none"> ▪ Selection of specific construction equipment (e.g., specialized pieces of equipment with smaller engines or equipment that will be more efficient and reduce engine runtime); ▪ Requiring equipment to use alternative fuel sources (e.g., electric-powered and liquefied or compressed natural gas), meet cleaner emission standards (e.g., U.S. EPA Tier IV Final emissions standards for equipment greater than 50-horsepower), and/or utilizing added exhaust devices (e.g., Level 3 Diesel Particular Filter); ▪ Minimizing the idling time of diesel-powered construction equipment to two minutes; 		

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		<ul style="list-style-type: none"> ▪ Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM; ▪ Requiring all contractors use equipment that meets CARB's most recent certification standard for off-road heavy-duty diesel engines; and ▪ Application of Low-VOC paints to interior and/or exterior surfaces (e.g., paints that meet SCAQMD Rule 1113 "Low-VOC" or "Super-Compliant" requirements). 		
		<p>Mitigation Measure 5-3C: Use Low- and Super Compliant VOC Architectural Coatings During Operational Activities. The City shall require the use of Low- and Super-Compliant VOC Architectural Coatings in maintaining buildings in Freedom Circle Focus Area Plan through Covenants Conditions and Restrictions (CC&Rs) and Ground Lease. Developed parcels shall require within their CC&Rs and/or ground leases requirements for all future interior and exterior spaces to be repainted with architectural coatings that meet the "Low-VOC" or "Super-Compliant" requirements. "Low-VOC" refers to paints that meet the more stringent regulatory limits of South Coast Air Quality Management District AQMD Rule 1113. "Super-Compliant" refers to paints that have been reformulated to levels well below the "Low-VOC" limits.</p>	City; Individual project applicants	SU

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		<p>Mitigation Measure 5-3D: Implement TDM Program. Proposed residential and office land uses within the Freedom Circle Focus Area Plan shall prepare and implement Transportation Demand Management (TDM) programs that achieve a minimum reduction in vehicle miles traveled (VMT) of 20 percent compared to baseline conditions (i.e., without internal or external reductions accounted for, such as geographic location, land use interconnectivity, etc.), with at least 10 percent of the reduction coming through project-specific TDM measures (e.g., transit subsidies, telecommuting options, etc.).</p> <p>Even with implementation of these measures, this impact would remain significant and unavoidable.</p>	City; Individual project applicants	SU
<p>Impact 5-4: Result in a Cumulatively Considerable Net Increase in Criteria Pollutants for which the Region is Non-Attainment – Greystar General Plan Amendment. Implementation of the Greystar General Plan Amendment / Project could result in the emission of criteria air pollutants that have the potential to exceed BAAQMD thresholds of significance. These activities represent a potentially significant impact.</p>	S	<p>Mitigation Measure 5-4A: See Mitigation Measure 5-3A.</p> <p>Mitigation Measure 5-4B: Use Low- and Super Compliant VOC Architectural Coatings During Construction. During construction, the City shall require the Greystar Project use architectural coatings for exterior applications that meet “Low-VOC” or “Super-Compliant” standards, as defined in South Coast Air Quality Management District AQMD Rule 1113. “Super-Compliant” refers to paints that have been reformulated to levels well below the “Low-VOC”</p>	Greystar project applicant	LS

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		limits. This impact would be <i>less than significant with mitigation incorporated.</i>		
Impact 5-5: Generate Toxic Air Contaminant Emissions that Expose Sensitive Receptors to Substantial Pollutant Concentrations During Construction – Freedom Circle Focus Area Plan. Implementation of the Freedom Circle Focus Area Plan would result in construction activities over the next approximately 20 years that generate toxic air contaminant emissions and could expose sensitive receptors to substantial pollutant concentrations. These activities represent a <i>potentially significant impact.</i>	S	Mitigation Measure 5-5: See Mitigation Measure 5-3B. Even with implementation of these measures, this impact would remain <i>significant and unavoidable.</i>	City; Individual project applicants	SU
Impact 5-6: Expose Sensitive Receptors to Substantial Operational Pollutant Concentrations – Freedom Circle Focus Area Plan	LS	N/A	N/A	N/A
Impact 5-7: Expose Sensitive Receptors to Substantial Pollutant Concentrations – Greystar General Plan Amendment	LS	N/A	N/A	N/A
Impact 5-8: Odors – Freedom Circle Focus Area Plan	LS	N/A	N/A	N/A
Impact 5-9: Odors – Greystar General Plan Amendment	LS	N/A	N/A	N/A

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<i>BIOLOGICAL RESOURCES</i>				
Impact 6-1: Impacts on Special-Status Species, Riparian Habitat, Sensitive Natural Communities, and Wetlands	LS	N/A	N/A	N/A
<p>Impact 6-2: Potential Impacts on Threatened and Endangered Species Habitat. Because biological resources are mobile and may colonized or relocate, even within built structures, before project work begins, the City would evaluate whether each individual, future project application (with the exception of the Greystar site [Ground-truthing of the biological resources on the Greystar property site on the December 12, 2020 site visit provided no evidence that further biological surveys would be required to be in compliance with this EIR’s mitigation measures, as the site contained no vegetation, no aquatic resources, is regularly disked, and did not contain any small mammal burrows.]) would be required to prepare a biological resource survey for City review prior to approval of any development. This is to ensure that any future project activities within the Focus Plan Area that have the potential to degrade the habitat of any threatened or endangered species are evaluated according to Policy 5.10.1-P1 of the Santa Clara General Plan (see “Regulatory Setting” above). Disregarding City evaluation of the need for</p>	S	<p>Mitigation 6-2. Upon receiving applications for projects within the project area, the City shall evaluate the need for a specific biological resource survey of the project area and adjacent area that may be indirectly impacted by project work. If no biological resources are determined to be at risk for an individual project (i.e., potential for bird and bat species, within and directly adjacent to the project area, to occur and/or be affected by project activities is negligible), no further survey shall be required. However, if the City determines that biological resources within the proposed project area require further analysis, the project proponent shall be required to conduct a biological resource survey of the habitat and special-status species that may be impacted by project activities, either directly or indirectly. A report shall be provided to the City detailing survey methods, results, performance standards, and avoidance and minimization measures required to protect any special-status species with potential to be impacted, consistent with the regulatory agency protocols. Implementation of this measure would reduce the impact to a less-than-significant level.</p>	City; Individual project applicants	LS

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<p>further biological resource surveys would be in violation of City policy and is therefore considered a potentially significant impact.</p> <p>Impact 6-3: Potential Impacts on Special-Status Plants. There is a low potential for Congdon’s tarplant (<i>Centromadia parryi</i> ssp. <i>congdonii</i>; California Rare Plant Rank 1B.2) and arcuate bush mallow (<i>Malacothamnus arcuatus</i>; California Rare Plant Rank 1B.2) to occur within the project area (with the exception of the Greystar site, which has been confirmed not to contain these plant species) , especially if the area is left undisturbed for a long period of time (i.e., a year or longer) and plants are able to colonize the project site. Without a proactive mitigation procedure in place, Plan implementation and any future projects planned within the Focus Area Plan could inadvertently result in the removal of special-status plants. This is considered a potentially significant impact.</p>	S	<p>Mitigation 6-3. Before any project work within the project area, including the Greystar project site, a qualified botanist shall conduct site-specific, focused surveys according to CDFW guidelines to determine presence or absence of special-status plant species on the individual project site and any adjacent potential area of disturbance. A comprehensive, site-wide survey should be conducted within May to September before project work begins, to encompass the Congdon’s tarplant and arcuate bush mallow’s blooming periods. Following the completion of the surveys, a survey results report shall be prepared and provided to the City. This report should include, but should not be limited to, the following: (1) a description of the survey methodology; (2) a discussion of the survey results; and (3) a map showing the survey area and the location of any special-status plants encountered. If no rare plants are found, then no further mitigation would be required.</p> <p>If rare plants are found during the survey, the number of individuals present shall be documented, and the limits of population shall be marked with flagging. The flagged border of the population shall be avoided by construction personnel for the duration of the project. If the</p>	City; Individual project applicants	LS

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		<p>species cannot be avoided or may be indirectly impacted, the applicant shall notify CDFW to discuss avoidance, minimization, and other measures as appropriate for each species population, including measures to be taken and protocols to be followed if special-status plants are inadvertently disturbed during construction activities.</p> <p>CDFW may require the preparation and implementation of a mitigation plan that details avoidance, preservation, and/or compensation for the loss of individual special-status plant species. Mitigation may include the purchase of mitigation bank credits, preserving and enhancing existing on-site populations, creation of off-site populations through seed collection and/or transplantation and monitoring these populations to ensure their successful establishment, and/or preserving occupied habitat off-site in perpetuity. Specific amount and method of mitigation and/or credits shall be determined in formal consultation with CDFW and/or USFWS.</p> <p>Implementation of this measure would reduce the impact to a <i>less-than-significant level</i>.</p>		
<p>Impact 6-4: Potential Impacts on Nesting Birds or Roosting Bats. The Federal Migratory Bird Treaty Act and California Fish and Game Code sections 3503, 3503.5, 3513,</p>	S	<p>Mitigation 6-4. The demolition of any buildings, disturbance of gravel substrate, and/or removal of trees, shrubs, or weedy vegetation shall be avoided during the February 1 through August</p>	<p>City; Individual project applicants</p>	LS

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<p>3800, and 4150 protect migratory and nesting birds, as well as roosting bats. Although the project does not specify which trees or buildings might be removed under individual projects facilitated by the Plan, trees (potential nesting and roosting habitat) or buildings could be disturbed or removed by Plan implementation. The possibility of removing trees and/or buildings that contain nests or roosting bats is identified here as a potentially significant impact. Any direct removal of trees or indirect disturbance by construction or operational activities during the nesting season that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a "take."</p> <p>There is a low potential for burrowing owl (<i>Athene cunicularia</i>; California species of special concern), white-tailed kite (<i>Elanus leucurus</i>; California Fully-Protected Species), pallid bat (<i>Antrozous pallidus</i>), and Townsend's big-eared bat (<i>Corynorhinus townsendii</i>; California species of special concern) to utilize the landscaped habitat within the project area for roosting and/or nesting, especially if the area is left undisturbed for a long period of time. In addition, many common bird species without a special status, though protected by the MBTA, MBPA, and California Fish and Game Code (CFGC), may utilize buildings, gravel</p>		<p>31 bird nesting period to the extent possible. If no demolition, gravel disturbance, vegetation, or tree removal is proposed during the nesting period, no further action is required. If it is not feasible to avoid the nesting period, the project applicant shall retain a qualified wildlife biologist to conduct a survey for nesting birds at most 14 days prior to the start of removal of trees, shrubs, grassland vegetation, or buildings, including prior to grading or other construction activity. If demolition of buildings, disturbance of gravel substrate, or vegetation removal efforts do not begin within the 14 days following the nesting bird survey, another survey shall be required. The area surveyed shall include all construction sites, access roads, and staging areas, as well as reasonably accessible areas within 150 feet outside the boundaries of the areas to be cleared or as otherwise determined by the biologist and dependent on species' life history requirements.</p> <p>If an active nest is discovered in the areas to be directly physically disturbed, or in other habitats within the vicinity of construction boundaries and may be disturbed by construction activities (as determined by the qualified biologist), clearing and construction shall be postponed within a species-specific no-work buffer (to be determined by the qualified biologist and based on the species life history and regulatory requirements) until the biologist has determined</p>		

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<p>substrates, and the landscaped vegetation within the project area for nesting, foraging, and roosting. Common bat species protected by the CFGC may also rarely utilize vegetation or roof tiles within the project area for individual roosting. Without a proactive mitigation procedure in place, Plan implementation could inadvertently result in the removal of existing trees containing nests or eggs of migratory birds, raptors, or bird species during the nesting season, or roosting bats, which would be considered unlawful take under the MBTA and the CFGC (see Regulatory Setting above). This is considered a <i>potentially significant impact</i>.</p>		<p>that the young have fledged (left the nest), the nest fails, or the nest is otherwise determined to be inactive by the biologist (i.e., predation).</p> <p>To avoid impacts to roosting bats that may rarely utilize the project area vegetation, roof tiles, and/or vacant buildings for day roosting, the project applicant shall retain a qualified wildlife biologist to conduct a survey for roosting bats no sooner than 14 days prior to the start of demolition of any vacant buildings left with entry and egress points accessible to bats or removal of suitable bat roosting vegetation. If demolition of buildings or vegetation removal efforts do not begin within the 14 days following the roosting bat survey, another survey shall be required. If roosting bats are detected, the biologist shall enact a minimum of a 150-foot no-work buffer and confer with CDFW to determine potential roost protection or roost eviction practices. After conferring with CDFW, the protective buffer may be adjusted based on specific roost needs. Once bats have been suitably protected by a buffer and/or safely evicted from roosting sites (as approved by CDFW, avoiding take as defined by CESA and the CFGC), construction may resume outside the buffered area.</p> <p>A nesting bird and roosting bat survey report of the methods and results of the pre-project survey will be submitted to the City for review and approval prior to commencement of</p>		

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		<p>construction activities for individual projects. Any additional construction monitoring, as determined through any necessary coordination/discretionary approvals with the resource agencies, will be documented per requirements set forth in an approved mitigation monitoring and reporting program for the entirety of the project.</p> <p>Implementation of this measure would reduce the impact to a less-than-significant level.</p>		
Impact 6-5: Potential Impacts on Protected Trees, Plants, and Shrubs	LS	N/A	N/A	N/A

CULTURAL AND HISTORIC RESOURCES

Impact 7-1: Destruction/Degradation of Historic Resources—Plan Area. There may be one or more properties or features within the Focus Area Plan Area, now or in the future, that meets the CEQA definition of a historic resource, including properties or features eligible for listing in a local, State, or Federal register of historic resources. Future development projects in the Focus Area Plan Area, which would be required to be consistent with the standards and guidelines incorporated in a subsequent comprehensive planning study (such as a specific plan) adopted by the City to guide Plan Area development, may ultimately cause substantial adverse changes in the

Mitigation 7-1. For any individual discretionary project under the subsequent comprehensive planning study (such as a specific plan) adopted by the City to guide Plan Area development that the City determines may involve a property that contains a potentially significant historic resource, the resource shall be assessed by a professional who meets the Secretary of the Interior's Professional Qualifications Standards to determine whether the property is a significant historic resource and whether or not the project may have a potentially significant adverse effect on the historic resource. If, based on the recommendation of the qualified professional, the City determines that the project may have a

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Individual
project
applicants

SU

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<p>significance of one or more such historic resources. Substantial adverse changes that may occur include physical demolition, destruction, relocation, or alteration of one or more historic resources or its immediate surroundings such that the resource is "materially impaired." The significance of a historic resource would be considered potentially "materially impaired" when and if an individual future development project proposes to demolish or materially alter the physical characteristics that justify the determination of its significance (CEQA Guidelines section 15064.5[b]). Such adverse changes in the significance of a CEQA-defined historic resource would be a significant impact.</p>		<p>potentially significant effect, the City shall require the applicant to implement the following mitigation measures:</p> <p>(a) Adhere to at least one of the following Secretary of the Interior's Standards:¹</p> <ul style="list-style-type: none"> ▪ Secretary of Interior's <i>Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings</i>; or ▪ Secretary of Interior's <i>Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings</i>. <p>The qualified professional shall make a recommendation to the City as to whether the project fully adheres to the Secretary of the Interior's Standards, and any specific modifications necessary to do so. The final determination as to a project's adherence to the Standards shall be made by the City body with final decision-making authority over the project. Such a determination of individual project adherence to the Secretary of the Interior's Standards will constitute mitigation of the project</p>		

¹Under the CEQA Guidelines (section 15064.5[b][3]), a project's adverse impact on a historic resource generally can be mitigated to a less-than-significant level by following either of these standards.

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		<p>historic resource impacts to a less-than-significant level (CEQA Guidelines section 15064.5).</p> <p>(b) If the City determines that measure (a) is not feasible, the historic resource shall be moved to a new location compatible with the original character and use of the historic resource, and its historic features and compatibility in orientation, setting, and general environment shall be retained, such that a substantial adverse change in the significance of the historic resource is avoided.¹ Implementation of measure (b) would reduce the impact to a less-than-significant level.</p> <p>If the City determines that neither measure (a) nor measure (b) is feasible, to the extent required by CEQA, additional analysis shall be conducted in accordance with CEQA Guidelines Section 15064.5 and 15162, particularly in order for specific project alternatives to be designed and evaluated. If the City determines that</p>		

¹One example of a substantial adverse change would be the loss of eligibility for listing on the California Register. The State Historical Resources Code encourages the retention of historic resources on-site and discourages the non-historic grouping of historic buildings into parks or districts. However, it is recognized that moving a historic building, structure, or object is sometimes necessary to prevent its destruction. Therefore, a moved building, structure, or object that is otherwise eligible may be listed in the California Register if it was moved to prevent its demolition at its former location and if the new location is compatible with the original character and use of the historic resource. A historic resource should retain its historic features and compatibility in orientation, setting, and general environment.

(California Office of Historic Preservation, *California Register and National Register: A Comparison*, Technical Assistance Series 6; Sacramento, CA: California Department of Parks and Recreation, 2001)

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		<p>neither measure (a) nor (b) is found to be feasible, then the City shall, as applicable and to the extent feasible, implement the following measures in the following order:</p> <p>(c) Document the historic resource before any changes that would cause a loss of integrity and loss of continued eligibility. The documentation shall adhere to the Secretary of the Interior's <i>Standards for Architectural and Engineering Documentation</i>. The level of documentation shall be proportionate with the level of significance of the resource. The documentation shall be made available for inclusion in the Historic American Building Survey (HABS) or the Historic American Engineering Record (HAER) Collections in the Library of Congress, the California Historical Resources Information System (CHRIS), and the Bancroft Library, as well as local libraries and historical societies.</p> <p>(d) Retain and reuse the historic resource to the maximum feasible extent and continue to apply the Secretary of the Interior's Standards to the maximum feasible extent in all alterations, additions, and new construction.</p> <p>(e) Through careful methods of planned deconstruction to avoid damage and loss, salvage character-defining features and materials for educational and interpretive use on-site, or for reuse in new construction on the site</p>		

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		<p>in a way that commemorates their original use and significance.</p> <p>(f) Interpret the historical significance of the resource through a permanent exhibit or program in a publicly accessible location on the site or elsewhere within the Plan Area.</p> <p>Implementation of measures (b), (c), (d), (e), and/or (f) would reduce a significant impact on historic resources, but not to a less-than-significant level. Without knowing the characteristics of the potentially affected historic resource or of the future individual development proposal, the City cannot determine with certainty that measure (a) or (b) above would be considered feasible. Consequently, this impact is currently considered significant and unavoidable.</p>		
Impact 7-2: Destruction/Degradation of Historic Resources—GreyStar Project	LS	N/A	N/A	N/A
Impact 7-3: Potential for Disturbance of Buried Archaeological Resources, Including Human Remains, and Tribal Cultural Resources—Plan Area. Development facilitated by the subsequent comprehensive planning study (such as a specific plan) could disturb unrecorded sensitive archaeological resources or tribal cultural resources in the	S	Mitigation 7-3. During the City’s standard project-specific review process for all future, discretionary, public improvement and private development projects under the subsequent comprehensive planning study (such as a specific plan) adopted by the City to guide development in the Plan Area, the City shall determine the possible presence of, and the	City; Individual project applicants	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<p>Plan Area. This possibility represents a <i>potentially significant impact</i>.</p>		<p>potential for new or substantially more severe impacts of the action on, archaeological resources and tribal cultural resources. The City shall require individual project applicants or environmental consultants to contact the California Historical Resources Information System (CHRIS) to determine whether the particular project is located in a sensitive area. Future discretionary development projects that CHRIS determines may be located in a sensitive area – i.e., on or adjoining an identified archaeological site – shall proceed only after the project applicant contracts with an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards, to conduct a determination in regard to cultural values remaining on the site and warranted mitigation measures, as described directly below.</p> <p>In general, to make an adequate determination in these instances, the archaeologist shall conduct a preliminary field inspection to (1) assess the amount and location of visible ground surface, (2) determine the nature and extent of previous impacts, and (3) assess the nature and extent of potential impacts. Such field inspection may demonstrate the need for some form of additional subsurface testing (e.g., excavation by auger, shovel, or backhoe unit) or, alternatively, the need for on-site monitoring of subsurface activities (i.e., during grading or trenching).</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>In addition, the City shall continue to notify the Native American tribes traditionally and culturally affiliated with the Plan Area of the discretionary, public improvement and private development projects if those proposed improvements or projects are subject to a CEQA Negative Declaration (including Mitigated Negative Declaration) or Environmental Impact Report (EIR), in accordance with California Assembly Bill 52, and if a Native American tribe requests consultation, conduct a good faith consultation.</p> <p>Following field inspection and completion of all necessary phases of study as determined by the archaeologist and the City, damage to any identified archaeological resources shall be avoided or mitigated to the maximum extent possible. Preservation in place to maintain the relationship between the artifact(s) and the archaeological context is the preferred manner of mitigating impacts on an archaeological site. Preservation may be accomplished by:</p> <ul style="list-style-type: none"> ▪ Planning construction to avoid the archaeological or tribal cultural site; ▪ Incorporating the site within a park, green space, or other open space element; ▪ Covering the site with a layer of chemically stable soil; or 		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
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- Deeding the site into a permanent conservation easement.

When in-place mitigation is determined by the City to be infeasible, a *data recovery plan*, which makes provisions for adequate recovery of culturally or historically consequential information about the site (including artifacts discovered on the site), subject to review and approval by the City, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be submitted to the CHRIS Northwest Information Center. If Native American artifacts are indicated, the studies shall also be submitted to the Native American Heritage Commission (NAHC). CHRIS and NAHC are recognized as experts in their respective disciplines.

Identified cultural resources shall be recorded on form DPR 422 (archaeological sites). Mitigation measures recommended by these two groups (CHRIS and NAHC), as reviewed and approved by the City, shall be undertaken prior to and during construction activities. Although the precise details of the mitigation measures would be specific to the particular project site, the measures shall be consistent with the avoidance and mitigation strategies described in this programmatic mitigation measure.

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>A <i>data recovery plan</i> and data recovery for a historic resource shall not be required if the City determines that testing or studies already completed have adequately recovered the necessary data, provided that the data have already been documented in an EIR or are available for review at the CHRIS Northwest Information Center (CEQA Guidelines section 15126.4[b]).</p> <p>Resource identification training procedures shall be implemented for construction personnel, conducted by an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards. In the event that subsurface cultural resources are otherwise encountered during approved ground-disturbing activities for a Plan Area construction activity, work within 50 feet shall be stopped and a qualified archaeologist retained to evaluate the finds following the procedures described above. Project personnel shall not collect cultural resources. Although work may continue beyond 50 feet, the archaeologist shall be empowered to temporarily halt or redirect construction activities to ensure avoidance of adverse impacts to archaeological resources.</p> <p>If human remains are found, the rules set forth in State Health and Safety Code section 7050.5 and CEQA Guidelines section 15126.4(b) apply and shall be followed.</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		Implementation of this measure would reduce the impact to a <i>less-than-significant level</i> .		
Impact 7-4: Potential for Disturbance of Buried Archaeological Resources, Including Human Remains and Tribal Cultural Resources—Greystar Project. Development of the Greystar project could disturb unrecorded sensitive archaeological resources or tribal cultural resources on the project site. This possibility represents a <i>potentially significant impact</i> .	S	<p>Mitigation 7-4. Prior to construction activities, resource identification training procedures shall be implemented for construction personnel, conducted by an archaeologist who meets the Secretary of the Interior’s Professional Qualifications Standards. The qualified professional archaeologist shall be retained by the applicant and approved by the City and shall meet U.S. Secretary of the Interior’s Professional Qualifications and Standards. Training shall include a written handout and focus on how to identify cultural/Native American resources that may be encountered during earth-moving activities, including the procedures to be followed in such an event. On-site archaeological monitor duties and the general steps a qualified professional archaeologist would follow in conducting a salvage investigation shall also be explained, in case either or both becomes necessary.</p> <p>During ground-disturbing project construction activities, if subsurface cultural resources are encountered, work within 50 feet shall be stopped and a qualified archaeologist retained to evaluate the finds following the procedures described below. Project personnel shall not collect cultural resources. Although work may</p>	City; Greystar project applicant	LS

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See Table 1.1 for definitions.

Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>continue beyond 50 feet, the archaeologist shall be empowered to temporarily halt or redirect construction activities to ensure avoidance of adverse impacts to archaeological resources.</p> <p>All cultural/archaeological resources unearthed by project construction activities shall be evaluated by the qualified professional archaeologist. Should the newly discovered artifacts be determined to be prehistoric, Native American Tribes and/or Individuals shall be contacted and consulted, and Native American construction monitoring shall be initiated if requested by the Tribes and/or Individuals. The City shall coordinate with the archaeologist to develop an appropriate treatment plan that avoids or mitigates, to the maximum extent possible, damage to any identified resources. Preservation in place to maintain the relationship between the artifact(s) and the archaeological context is the preferred manner of mitigating impacts on an archaeological site. Preservation may be accomplished by:</p> <ul style="list-style-type: none"> ▪ Planning construction to avoid the archaeological or tribal cultural site; ▪ Incorporating the site within a park, green space, or other open space element; ▪ Covering the site with a layer of chemically stable soil; or 		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<ul style="list-style-type: none"> ▪ Deeding the site into a permanent conservation easement. <p>If in-place mitigation is determined by the City to be infeasible, a <i>data recovery plan</i>, which makes provisions for adequate recovery of culturally or historically consequential information about the site (including artifacts discovered on the site), subject to review and approval by the City, shall be prepared and adopted prior to any excavation being undertaken. The study shall be submitted to the CHRIS Northwest Information Center, and if Native American artifacts are indicated, the study shall also be submitted to the Native American Heritage Commission (NAHC). CHRIS and NAHC are recognized as experts in their respective disciplines.</p> <p>Identified cultural resources shall be recorded on form DPR 422 (archaeological sites). Any additional mitigation measures recommended by these two groups (CHRIS and NAHC), as reviewed and approved by the City, shall be undertaken prior to and during construction activities. Although the precise details of those measures would be based on the nature and extent of the resource(s) uncovered on the site, the measures shall be consistent with the avoidance and mitigation strategies described above in this mitigation measure.</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>In addition, if the qualified archaeologist determines that construction excavations have exposed, or have a high probability of exposing, cultural and/or archaeological artifacts, construction monitoring for cultural and/or archaeological resources shall be required. The City shall retain a qualified archaeological monitor, who meets the qualifications set forth by the U.S. Secretary of the Interior's Professional Qualifications and Standards, who will work under the guidance and direction of a professional archaeologist. The archaeological monitor shall be present during all construction excavations (e.g., grading, trenching, or clearing/grubbing) into non-fill sediments. Multiple earth-moving construction activities may require multiple archaeological monitors.</p> <p>The frequency of monitoring shall be based on the rate of excavation and grading activities, proximity to known archaeological resources, the materials being excavated (native versus artificial fill soils), the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring can be reduced to part-time inspections if determined adequate by the project archaeologist.</p> <p>If human remains are found, the rules set forth in State Health and Safety Code section 7050.5 and CEQA Guidelines section 15126.4(b) apply</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		and shall be followed, in consultation with the Native American Heritage Commission (as appropriate).		
		Implementation of this measure would reduce the impact to a <i>less-than-significant level</i> .		
<i>GEOLOGY AND SOILS</i>				
Impact 8-1: Effects of Strong Seismic Ground Shaking—Plan Area	LS	N/A	N/A	N/A
Impact 8-2: Effects of Strong Seismic Ground Shaking—Greystar Project	LS	N/A	N/A	N/A
Impact 8-3: Potential Soil Erosion and Loss of Topsoil—Plan Area	LS	N/A	N/A	N/A
Impact 8-4: Potential Soil Erosion and Loss of Topsoil—Greystar Project	LS	N/A	N/A	N/A
Impact 8-5: Potential Ground Instability Impacts—Plan Area. The potential for ground instability can depend on specific, highly localized underlying soil conditions. Determination of differential settlement, liquefaction, lateral spreading, and subsidence potential in the Plan Area would require site-specific geotechnical studies for future individual development proposals. Possible ground instability conditions, if not properly	S	Mitigation 8-5. Subject to City review and approval, complete and implement the geotechnical mitigation recommendations identified in the required individual project- and site-specific geotechnical investigations and engineering studies for site-specific proposals, in coordination with City grading permit and building permit performance standards. Such recommendations could address design- and construction-level details regarding the type of	City; Individual project applicants	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<p>engineered for, could result in associated significant damage to project buildings, other improvements, and adjacent property, with direct or indirect risks to life or property, representing a potentially significant impact.</p>		<p>building foundation, the extent of subsurface excavation, the details of retaining structures, any need for subsurface water extraction, and other engineering issues and solutions. Incorporation of this mitigation requirement would reduce this impact to a less-than-significant level.</p>		
<p>Impact 8-6: Potential Ground Instability Impacts—Greystar Project. The potential for ground instability would depend on specific, highly localized underlying soil conditions. As discussed in section 8.1.4, the Rockridge geotechnical report concluded that although no major geotechnical or geological issues would prevent development of the proposed project on the site, the following issues would need to be addressed:</p> <ul style="list-style-type: none"> ▪ adequate foundation support for the structures; ▪ weaker, more compressible zones of clay above about 30 feet below ground surface (bgs); ▪ moderately to highly expansive near-surface soil and susceptibility to large volume changes with moisture changes; and 	S	<p>Mitigation 8-6. The City shall require the applicant to provide a final geotechnical report, prepared by a geotechnical engineer, for City review and approval. The final geotechnical report (as discussed in Impact 8-2 above) shall include a supplemental field investigation that includes: (1) new borings as necessary to confirm subsurface conditions; (2) review of final project plans and specifications with recommendations based on professional geotechnical engineering (such as final foundation design recommendations and potential need for piles); (3) any other engineering studies to address design- and construction-level details related to type of building foundation, the extent of subsurface excavation, details of retaining structures or subsurface water extraction, and other engineering issues and solutions as may be determined necessary in consultation with the City; and (4) observation of site preparation, foundation installation, shoring installation, and</p>	City; Greystar project applicant	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<ul style="list-style-type: none"> liquefaction-induced settlement potential at one location in the southwestern part of the site. <p>Possible ground instability conditions, if not properly engineered for, could result in associated significant damage to project buildings, other improvements, and adjacent property, with direct or indirect risks to life or property, representing a potentially significant impact.</p>		<p>the placement and compaction of fill during construction by a professional geotechnical engineer.</p> <p>The mitigations and recommendations in the final geotechnical report, subject to review and approval by the City, shall be complied with and would provide reasonable, professional assurances that the project incorporates design and engineering refinements to reduce the degree of impacts to less-than-significant levels by either avoiding identified soil and geologic impact areas altogether (i.e., basic project design changes) or by rectifying the impact through conventional engineering and construction procedures (e.g., suitable foundation design and construction). Incorporation of these measures into project final plans prior to issuance of permits and City inspection and verification procedures prior to project operation is required and would reduce this impact to a less-than-significant level.</p>		
<p>Impact 8-7: Potential for Disturbance of Paleontological Resources—Plan Area. Development facilitated by the Freedom Circle Focus Area Plan could disturb unrecorded paleontological resources in the Plan Area. This possibility represents a potentially significant impact.</p>	S	<p>Mitigation 8-7. For all public improvement and private development projects in the Freedom Circle Focus Area Plan Area, the following measures shall be implemented:</p> <p>(1) <i>Education Program.</i> Project applicants shall implement a program that includes the following elements:</p>	City; Individual project applicants	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<ul style="list-style-type: none"> ▪ Resource identification training procedures for construction personnel, conducted by a paleontologist who meets the Secretary of the Interior’s Professional Qualifications Standards; ▪ Spot-checks and monitoring by a qualified paleontologist of all excavations deeper than seven feet below ground surface; and ▪ Procedures for reporting discoveries and their geologic context. <p><i>(2) Procedures for Resources Encountered.</i> If subsurface paleontological resources are encountered, excavation shall halt within a buffer area of at least 50 feet around the find, where construction activities will not be allowed to continue until the project paleontologist evaluates the resource and its stratigraphic context. Work shall be allowed to continue outside the buffer area; however, the paleontologist shall be empowered to temporarily halt or redirect construction activities to ensure avoidance of adverse impacts to paleontological resources. During monitoring, if potentially significant paleontological resources are found, “standard” samples shall be collected and processed by a qualified paleontologist to recover micro vertebrate fossils. If significant fossils are found and collected, they shall be prepared to a reasonable point of identification.</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>Excess sediment or matrix shall be removed from the specimens to reduce the bulk and cost of storage.</p> <p>Itemized catalogs of material collected and identified shall be provided to a local museum repository with the specimens. Significant fossils collected during this work, along with the itemized inventory of these specimens, shall be deposited in a local museum repository for permanent curatorship and storage. A report documenting the results of the monitoring and salvage activities, and the significance of the fossils, if any, shall be prepared. The report and inventory, when submitted to the City, shall signify the completion of the program to mitigate impacts on paleontological resources.</p> <p>Implementation of this measure would reduce the impact to a less-than-significant level.</p>		
<p>Impact 8-8: Potential for Disturbance of Paleontological Resources—Greystar Project. Similar to Impact 8-7, development of the Greystar project could disturb unrecorded paleontological resources in the Plan Area. This possibility represents a potentially significant impact.</p>	S	<p>Mitigation 8-8. The Greystar project shall be required, as a condition of project approval, to implement the following measures:</p> <p>(1) <i>Education Program.</i> The project applicant shall implement a program that includes the following elements:</p> <ul style="list-style-type: none"> ▪ Resource identification training procedures for construction personnel, conducted by a paleontologist who meets the Secretary of 	City; Greystar project applicant	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>the Interior’s Professional Qualifications Standards;</p> <ul style="list-style-type: none"> ▪ Spot-checks and monitoring by a qualified paleontologist of all excavations deeper than seven feet below ground surface; and ▪ Procedures for reporting discoveries and their geologic context. <p><i>(2) Procedures for Resources Encountered.</i> If subsurface paleontological resources are encountered, excavation shall halt within a buffer area of at least 50 feet around the find, where construction activities will not be allowed to continue until the project paleontologist evaluates the resource and its stratigraphic context. Work shall be allowed to continue outside the buffer area; however, the paleontologist shall be empowered to temporarily halt or redirect construction activities to ensure avoidance of adverse impacts to paleontological resources. During monitoring, if potentially significant paleontological resources are found, “standard” samples shall be collected and processed by a qualified paleontologist to recover micro vertebrate fossils. If significant fossils are found and collected, they shall be prepared to a reasonable point of identification. Excess sediment or matrix shall be removed from the specimens to reduce the bulk and cost of storage.</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>Itemized catalogs of material collected and identified shall be provided to a local museum repository with the specimens. Significant fossils collected during this work, along with the itemized inventory of these specimens, shall be deposited in a local museum repository for permanent curatorship and storage. A report documenting the results of the monitoring and salvage activities, and the significance of the fossils, if any, shall be prepared. The report and inventory, when submitted to the City, shall signify the completion of the program to mitigate impacts on paleontological resources.</p> <p>Implementation of this measure would reduce the impact to a <i>less-than-significant level</i>.</p>		
GREENHOUSE GAS EMISSIONS AND ENERGY				
<p>Impact 9-1: GHG Emissions and Plan Consistency – Freedom Circle Focus Area Plan. Implementation of the Freedom Circle Focus Area Plan could generate GHG emissions that have a significant effect on the environment and/or conflict with a plan, policy, or regulation adopted for the purposes of reducing GHG emissions. This represents a <i>potentially significant impact</i>.</p>	S	<p>Mitigation Measure 9-1A: See Mitigation Measure 5-3D.</p> <p>Mitigation Measure 9-1B: Utilize GHG-Free Electricity. The City shall require new development projects occurring under implementation of the Freedom Circle Focus Area Plan to source 100% of their electricity from GHG-free sources. GHG-free electricity may come from on-site renewable electricity generation (e.g., photovoltaic systems),</p>	City; Individual project applicants	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		enrollment in a GHG-free electricity program (e.g., Silicon Valley Power’s <i>Santa Clara Green Power</i> program), or any combination of measures that ensure electricity consumed by projects subject to discretionary approval come entirely from GHG-free sources, as determined by the City.		
		This impact would be <i>less than significant with mitigation incorporated.</i>		
Impact 9-2: GHG Emissions and Plan Consistency – Greystar General Plan Amendment	LS	N/A	N/A	N/A
Impact 9-3. Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources – Freedom Circle Focus Area Plan	LS	N/A	N/A	N/A
Impact 9-4. Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources – Greystar General Plan Amendment	LS	N/A	N/A	N/A
Impact 9-5. Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency – Freedom Circle Focus Area Plan	LS	N/A	N/A	N/A

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
Impact 9-6. Conflict with or Obstruct a State or Local Plan for Renewable Energy or Energy Efficiency – Greystar General Plan Amendment	LS	N/A	N/A	N/A
<i>HAZARDS AND HAZARDOUS MATERIALS</i>				
Impact 10-1: Project-Related Potential Impacts Due to Hazardous Materials Transport, Use, Storage, and Disposal—Plan Area	LS	N/A	N/A	N/A
Impact 10-2: Project-Related Potential Impacts Due to Hazardous Materials Transport, Use, Storage, and Disposal—Greystar Project	LS	N/A	N/A	N/A
Impact 10-3: Potential Exposure to Existing Hazardous Materials Contamination—Plan Area	LS	N/A	N/A	N/A
Impact 10-4: Potential Exposure to Existing Hazardous Materials Contamination—Greystar Project	LS	N/A	N/A	N/A
Impact 10-5: Project-Related Potential Asbestos and PCB Exposure—Plan Area	LS	N/A	N/A	N/A
Impact 10-6: Project-Related Potential Asbestos and PCB Exposure—Greystar Project	LS	N/A	N/A	N/A

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
Impact 10-7: Project-Related Potential Lead-Based Paint Exposure—Plan Area	LS	N/A	N/A	N/A
Impact 10-8: Project-Related Potential Lead-Based Paint Exposure—Greystar Project	LS	N/A	N/A	N/A
Impact 10-9: Potential for Hazardous Materials Near Schools—Plan Area	LS	N/A	N/A	N/A
Impact 10-10: Potential for Hazardous Materials Near Schools—Greystar Project	LS	N/A	N/A	N/A
Impact 10-11: Protocols for Government Code Section 65962.5 Sites—Plan Area	LS	N/A	N/A	N/A
Impact 10-12: Protocols for Government Code Section 65962.5 Sites—Greystar Project	LS	N/A	N/A	N/A
Impact 10-13: Consistency With San Jose Airport Comprehensive Land Use Plan—Plan Area	LS	N/A	N/A	N/A
Impact 10-14: Consistency With San Jose Airport Comprehensive Land Use Plan—Greystar Project	LS	N/A	N/A	N/A

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<i>HYDROLOGY AND WATER QUALITY</i>				
Impact 11-1: Construction Period and Post-Construction Water Quality Impacts—Plan Area	LS	N/A	N/A	N/A
Impact 11-2: Construction Period and Post-Construction Water Quality Impacts—Greystar Project	LS	N/A	N/A	N/A
Impact 11-3: Long-Term Water Quality Impacts from Project Operation—Plan Area	LS	N/A	N/A	N/A
Impact 11-4: Long-Term Water Quality Impacts from Project Operation—Greystar Project	LS	N/A	N/A	N/A
Impact 11-5: Effects on Groundwater Recharge and Groundwater Management—Plan Area	LS	N/A	N/A	N/A
Impact 11-6: Effects on Groundwater Recharge and Groundwater Management—Greystar Project	LS	N/A	N/A	N/A
Impact 11-7: Drainage Patterns and Risk of Flooding—Plan Area	LS	N/A	N/A	N/A
Impact 11-8: Drainage Patterns and Risk of Flooding—Greystar Project	LS	N/A	N/A	N/A

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<i>LAND USE AND PLANNING</i>				
Impact 12-1: Project Effects on the Physical Arrangement of the Community—Plan Area	LS	N/A	N/A	N/A
Impact 12-2: Project Effects on the Physical Arrangement of the Community—Greystar Project	LS	N/A	N/A	N/A
Impact 12-3: Project Consistency with Land Use Plans, Policies, and Regulations Adopted for the Purpose of Avoiding or Mitigating Environmental Effects—Plan Area	LS	N/A	N/A	N/A
Impact 12-4: Project Consistency with Land Use Plans, Policies, and Regulations Adopted for the Purpose of Avoiding or Mitigating Environmental Effects—Greystar Project	LS	N/A	N/A	N/A
<i>NOISE</i>				
Impact 13-1: Temporary Construction Noise Levels – Freedom Circle Focus Area Plan. The implementation of the Freedom Circle Focus Area Plan could result in construction and development activities in the Plan Area that generate noise levels above City standards and/or otherwise result in a	S	Mitigation 13-1: Reduce Potential Freedom Circle Focus Area Plan Construction Noise Levels. To reduce potential noise levels from Focus Area Plan related construction activities, the City shall ensure future development projects within the Plan Area:	City; Individual project applicants	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<p>substantial, temporary increase in ambient noise levels in the vicinity of the Plan Area. This represents a potentially significant impact.</p>		<p>1) <i>Notify Residential and Commercial Land Uses of Planned Construction Activities.</i> This notice shall be provided at least one week prior to the start of any construction activities, describe the noise control measures to be implemented by the Project, and include the name and phone number of the designated contact for the Applicant/project representative and the City of Santa Clara responsible for handling construction-related noise complaints (per Section 8). This notice shall be provided to: A) The owner/occupants of residential dwelling units within 500 feet of construction work areas; and B) The owner/occupants of commercial buildings (including institutional buildings) within 200 feet of construction work areas or within 400 feet of construction work areas if pile driving equipment will be used.</p> <p>2) <i>Notify San Tomas Aquino Creek Trail Users of Construction Activities.</i> Prior to the start of construction activities within 500 feet of the San Tomas Aquino Creek Trail, signs shall be posted along the trail warning of potential temporary elevated noise levels during construction. Signs shall be posted within 250 feet of impacted trail segments (i.e., portions of the trail within 500 feet of a work area) and shall remain posted throughout the duration of all substantial noise generating construction activities (typically demolition, grading, and initial foundation installation activities).</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>3) <i>Restrict Work Hours.</i> All construction-related work activities, including material deliveries, shall be subject to the requirements of City Municipal Code Section 9.10.230. Construction activities, including deliveries, shall occur only during the hours of 7:00 AM to 6:00 PM, Monday through Friday, and 9 AM to 6 PM on Saturday, unless otherwise authorized by City permit. The applicant/project representative and/or its contractor shall post a sign at all entrances to the construction site informing contractors, subcontractors, construction workers, etc. of this requirement.</p> <p>4) <i>Control Construction Traffic and Site Access.</i> Construction traffic, including soil and debris hauling, shall follow City-designated truck routes and shall avoid routes (including local roads in the Plan Area) that contain residential dwelling units to the maximum extent feasible given specific project location and access needs.</p> <p>5) <i>Construction Equipment Selection, Use, and Noise Control Measures.</i> The following measures shall apply to construction equipment used in the Plan Area: A) To the extent feasible, contractors shall use the smallest size equipment capable of safely completing work activities; B) Construction staging shall occur as far away from residential and commercial land uses as possible; C) All stationary noise-</p>		

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See Table 1.1 for definitions.

Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>generating equipment such as pumps, compressors, and welding machines shall be shielded and located as far from sensitive receptor locations as practical. Shielding may consist of existing vacant structures or a three- or four-sided enclosure provide the structure/ barrier breaks the line of sight between the equipment and the receptor and provides for proper ventilation and equipment operations; D) Heavy equipment engines shall be equipped with standard noise suppression devices such as mufflers, engine covers, and engine/mechanical isolators, mounts, etc. These devices shall be maintained in accordance with manufacturer's recommendations during active construction activities; E) Pneumatic tools shall include a noise suppression device on the compressed air exhaust; F) The applicant/project representative and/or their contractor shall connect to existing electrical service at the site to avoid the use of stationary power generators (if feasible); G) No radios or other amplified sound devices shall be audible beyond the property line of the construction site.</p> <p>6) <i>Implement Construction Activity Noise Control Measures:</i> The following measures shall apply to construction activities in the Plan Area: A) Demolition: Activities shall be sequenced to take advantage of existing shielding/noise reduction provided by existing buildings or parts of buildings and methods that minimize noise</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>and vibration, such as sawing concrete blocks, prohibiting on-site hydraulic breakers, crushing, or other pulverization activities, shall be employed to the maximum extent feasible; B) Demolition Site Preparation, Grading, and Foundation Work: During all demolition, site preparation, grading, and structure foundation work activities within 500 feet of a residential dwelling unit or 400 feet of a commercial building (including institutional buildings), a physical noise barrier capable of achieving the construction noise level standards set forth in Section 7 below shall, if required pursuant to Section 7, be installed and maintained around the site perimeter to the maximum extent feasible given site constraints and access requirements. Potential barrier options capable of reducing construction noise levels could include, but are not limited to: i) A concrete, wood, or other barrier installed at-grade (or mounted to structures located at-grade, such as a K-Rail), and consisting of a solid material (i.e., free of openings or gaps other than weep holes) of sufficient height (determined pursuant to Section 7) that has a minimum rated transmission loss value of 20 dB; ii) Commercially available acoustic panels or other products such as acoustic barrier blankets that have a minimum sound transmission class (STC) or transmission loss value of 20 dB; iii) any combination of noise barriers and commercial products capable of achieving</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>required construction noise reductions during demolition, site preparation, grading, and structure foundation work activities; iv) The noise barrier may be removed following the completion of building foundation work (i.e., it is not necessary once framing and typical vertical building construction begins provided no other grading, foundation, etc. work is still occurring on-site); and C) Pile Driving: If pile driving activities are required within 500 feet of a residential dwelling unit or 400 feet of a commercial building, the piles shall be pre-drilled with an auger to minimize pile driving equipment run times.</p> <p>7) <i>Prepare Project-Specific Construction Noise Evaluation.</i> Prior to the start of any specific construction project lasting 12 months or more, the City shall review and approve a project-specific construction noise evaluation prepared by a qualified acoustical consultant that: A) Identifies the planned project construction sequence and equipment usage; B) Identifies typical hourly average construction noise levels for project construction equipment; C) Compares hourly average construction noise levels to ambient noise levels at residential and commercial land uses near work areas (ambient noise levels may be newly measured or presumed to be consistent with those levels shown in Table 13-2 and 13-3 of the Freedom Circle Focus Area Plan/Greystar General Plan</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>Amendment Draft Environmental Impact Report (EIR); and D) Identifies construction noise control measures incorporated into the project that ensure: i) activities do not generate noise levels that are above 60 dBA L_{eq} at a residential dwelling unit and exceed the ambient noise environment by at least 5 dBA L_{eq} for more than one year; and ii) activities do not generate noise levels that are above 70 dBA L_{eq} at a commercial property (including institutional land uses) and exceed the ambient noise environment by at least 5 dBA L_{eq} for more than one year. Such measures may include but are not limited to: a) The requirements of Sections 4, 5, 6, and 8; b) Additional project and/or equipment-specific enclosures, barriers, shrouds, or other noise suppression methods. The use of noise control blankets on building facades shall be considered only if noise complaints are not resolvable with other means or methods.</p> <p>8) <i>Prepare a Construction Noise Complaint Plan.</i> The Construction Noise Complaint Plan shall: A) Identify the name and/or title and contact information (including phone number and email) for a designated project and City representative responsible for addressing construction-related noise issues; B) Includes procedures describing how the designated project representative will receive, respond, and resolve construction noise complaints; C) At a</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>minimum, upon receipt of a noise complaint, the project representative shall notify the City contact, identify the noise source generating the complaint, determine the cause of the complaint, and take steps to resolve the complaint; D) The elements of the Construction Noise Complaint Plan may be included in the project-specific noise evaluation prepared to satisfy Section 7 or as a separate document.</p> <p>9) <i>Owner/Occupant Disclosure:</i> The City shall require future occupants/tenants in the Plan Area receive disclosure that properties in the Plan Area may be subject to elevated construction noise levels from development in the Plan Area. This disclosure shall be provided as part of the mortgage, lease, sub-lease, and/or other contractual real-estate transaction associated with the subject property.</p> <p>With implementation of these measures, this impact would be <i>less than significant</i>.</p>		
<p>Impact 13-2: Temporary Construction Noise Levels – Greystar General Plan Amendment. The Greystar project could result in construction and development activities in the Plan Area that generate noise levels above City standards and/or otherwise</p>	S	<p>Mitigation 13-2: Reduce Greystar Project Construction Noise Levels. To reduce potential noise levels from Greystar Project construction activities, the City shall ensure the Applicant:</p>	City; Greystar project applicant	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<p>result in a substantial, temporary increase in ambient noise levels in the vicinity of the Plan Area. This represents a potentially significant impact.</p>		<ol style="list-style-type: none"> 1) <i>Notify Residential and Commercial Land Uses of Planned Construction Activities.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft Environmental Impact Report (EIR) Mitigation Measure 13-1, Section 1. 2) <i>Notify San Tomas Aquino Creek Trail Users of Construction Activities.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Mitigation Measure 13-1, Section 2. 3) <i>Restrict Work Hours.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Mitigation Measure 13-1, Section 3. 4) <i>Control Construction Traffic and Site Access.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Mitigation Measure 13-1, Section 4. 5) <i>Construction Equipment Selection, Use, and Noise Control Measures.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Mitigation Measure 13-1, Section 5. 6) <i>Implement Construction Activity Noise Control Measures:</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment 		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>Draft EIR Mitigation Measure 13-1, Section. The project will not require pile driving and, therefore, pile driving control measures identified in Mitigation Measure 13-1, Section 6 C) are not applicable. See below for noise barrier mitigation requirements per Mitigation Measure 13-1, Section 6 B).</p> <p>7) <i>Prepare Project-Specific Construction Noise Evaluation.</i> Not applicable. The construction noise analysis presented in the Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft Environmental Impact Report constitutes the Project-specific construction noise evaluation per Mitigation Measure 13-1, Section 7.</p> <p>8) <i>Prepare a Construction Noise Complaint Plan.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Mitigation Measure 13-1, Section 8.</p> <p>9) <i>Owner/Occupant Disclosure:</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Mitigation Measure 13-1, Section 9.</p> <p>Per Mitigation Measure 13-1, Section 6 B), the following noise barriers shall be installed and maintained around the perimeter of active work areas: A) For all demolition, site preparation, grading, and foundation work within 100 feet of</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>the commercial property (Pedro’s Restaurant and Cantina) that borders the site’s southwest perimeter: i) a 6-foot-tall barrier shall be installed starting at Freedom Circle and extending south along the property boundary to the site’s southern property line (approximately 640 linear feet). B) For all demolition, site preparation, grading, and foundation work within 150 feet of commercial properties across Freedom Circle: i) a 6-foot-tall barrier shall be provided along the length of the property line that fronts Freedom Circle, excepting construction access points as needed (approximately 1,130 linear feet). C) Noise barriers shall consist of ½” plywood or any other material weighing 4 pounds per square foot or more or having a minimum documented transmission loss value of 20 dBA. The barriers may be erected on temporary retaining walls or temporary K-rails or other solid structures (which shall be considered as part of the total height of the barrier). Boards shall be staggered one over two, or joints otherwise fastened and sealed, to prevent sound transmission through joints. There shall be no openings or gaps in the barrier. The barrier shall be regularly inspected (e.g., weekly) and maintained during construction activities (e.g., warped or cracked boards shall be replaced upon discovery). D) The noise barrier may be removed following the completion of building foundation work within the distances specific above (i.e., it is not necessary once framing and typical vertical building construction</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		begins provided no other grading, foundation, etc. work is still occurring on-site).		
		With implementation of these measures, this impact would be less than significant .		
<p>Impact 13-3: Temporary Construction Vibration Levels – Freedom Circle Focus Area Plan. The implementation of the Freedom Circle Focus Area Plan could result in construction and development activities in the Plan Area that generate vibration levels above City standards and/or otherwise result excessive ground-borne vibration levels. This represents a potentially significant impact.</p>	S	<p>Mitigation 13-3: Reduce Potential Freedom Circle Focus Area Plan Construction Vibration Levels. To reduce potential vibration-related structural damage and other excessive vibration levels from Focus Area Plan related construction activities, the City shall ensure future development projects within the Plan Area:</p> <p>1) <i>Notify Residential and Commercial Land Uses of Planned Construction Activities.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft Environmental Impact Report (EIR) Mitigation Measure 13-1, Section 1.</p> <p>2) <i>Restrict Work Hours.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Mitigation Measure 13-1, Section 2.</p> <p>3) <i>Prohibit Vibratory Equipment.</i> The use of large vibratory rollers, vibratory/impact hammers, and other potential large vibration-generating equipment (e.g., hydraulic breakers/hoe rams) shall be prohibited within 100 feet of any</p>	City; Individual project applicants	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>residential building façade and 50 feet of any commercial building façade during construction activities. Plate compactors and compactor rollers are acceptable, and deep foundation piers or caissons shall be auger drilled.</p> <p>4) <i>Prepare Project-Specific Construction Vibration Evaluation Plan.</i> If it is not feasible to prohibit vibratory equipment per Section 3) due to site- or project-specific conditions or design considerations, the City shall review and approve a project-specific construction vibration evaluation that: A) Identifies the project’s planned vibration-generating construction activities (e.g., demolition, pile driving, vibratory compaction); B) Identifies the potential project-specific vibration levels (given project-specific equipment and soil conditions, if known) at specific building locations that may be impacted by the vibration-generating work activities (generally buildings within 50 feet of the work area); C) Identifies the vibration control measures incorporated into the project that ensure equipment and work activities would not damage buildings or result in vibrations that exceed Caltrans’ strongly perceptible vibration detection threshold for peak particle velocity (PPV) of 0.1 inches/second (in/sec). Such measures may include, but are not limited to: i) the requirements of Sections 1, 2, and 3; ii) the use of vibration monitoring to measure actual vibration levels; iii) the use of photo monitoring</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>or other records to document building conditions prior to, during, and after construction activities; and iv) the use of other measures such as trenches or wave barriers; D) Identifies the name (or title) and contact information (including phone number and email) of the Contractor and City-representatives responsible for addressing construction vibration-related issues; and E) Includes procedures describing how the construction contractor will receive, respond, and resolve to construction vibration complaints. At a minimum, upon receipt of a vibration complaint, the Contractor and/or City representative described in the first condition D) above shall identify the vibration source generating the complaint, determine the cause of the complaint, and take steps to resolve the complaint by reducing ground-borne vibration levels to peak particle velocity levels that do not exceed accepted guidance or thresholds for structural damage that are best applicable to potentially impacted buildings (e.g., see Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Table 13-6) and Caltrans' strongly perceptible vibration detection threshold (PPV of 0.1 in/sec, see Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Table 13-7).</p> <p>With implementation of these measures, this impact would be less than significant.</p>		

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<p>Impact 13-4: Temporary Construction Vibration Levels – Greystar General Plan Amendment. The Greystar project could result in construction and development activities in the Plan Area that generate vibration levels above City standards and/or otherwise result excessive ground-borne vibration levels. This represents a potentially significant impact.</p>	S	<p>Mitigation 13-4: Reduce Greystar Project Construction Vibration Levels. To reduce potential vibration-related structural damage and other excessive vibration levels from Greystar project construction activities, the City shall require the Applicant:</p> <p>1) <i>Notify Residential and Commercial Land Uses of Planned Construction Activities.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft Environmental Impact Report (EIR) Mitigation Measure 13-1, Section 1.</p> <p>2) <i>Restrict Work Hours.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Mitigation Measure 13-1, Section 2.</p> <p>3) <i>Prohibit Vibratory Equipment.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Mitigation Measure 13-3, Section 3.</p> <p>4) <i>Prepare Project-Specific Construction Vibration Evaluation Plan.</i> See Freedom Circle Focus Area Plan/Greystar General Plan Amendment Draft EIR Mitigation Measure 13-1, Section 3. Mitigation Measure 13-3, Section 4 A) – C) are not applicable because the construction vibration analysis presented in the Freedom Circle Focus Area Plan/Greystar General Plan</p>	City; Greystar project applicant	LS

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See Table 1.1 for definitions.

Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>Amendment Draft EIR constitutes the Project-specific construction vibration evaluation per Mitigation Measure 13-3, Section 4.</p> <p>With implementation of these measures, this impact would be <i>less than significant</i>.</p>		
<p>Impact 13-5: On-site Noise Levels from Focus Area Plan Development. The implementation of the Freedom Circle Focus Area Plan could result in new residential, office, and other land uses that generate noise from on-site equipment, activities, or other operations in excess of applicable City standards. This represents a <i>potentially significant impact</i>.</p>	S	<p>Mitigation 13-5: Control Fixed and Other On-site Noise-Generating Sources and Activities in the Freedom Circle Area Plan. To ensure on-site, operations-related equipment and activities associated with the Focus Area Plan do not generate noise levels that exceed City standards or otherwise result in a substantial permanent increase in ambient noise levels, future development projects shall submit a project-specific operational noise analysis to the City for review and approval prior to the issuance of the first building permit for the project, or as otherwise determined by the City. The noise analysis shall be prepared by a qualified acoustical consultant and shall identify all major fixed machinery and equipment, non-residential truck docks/dedicated loading zones, waste collection areas, and above ground parking garages included in the final project design/site plan. The noise analysis shall also document how project noise sources and activities will comply with the exterior sound limits established in Municipal Code Section 9.10.040, Schedule A and the noise compatibility guidelines in General Plan Table 8.14-1. Fixed machinery and</p>	<p>City; Individual project applicants</p>	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
		<p>equipment may include, but is not limited to, pumps, fans (including air intake or exhaust fans in parking garages), compressors, air conditioners, generators, and refrigeration equipment. The control of noise from such equipment may be accomplished by selecting quiet equipment types, siting machinery and equipment inside buildings, within an enclosure (e.g., equipment cabinet or mechanical closets, or behind a parapet wall or other barrier/shielding. Truck docks/dedicated loading zones consist of a loading dock or other dedicated area for the regular loading and unloading of retail, commercial, or other non-residential goods from delivery trucks. The control of noise from such truck docks/loading areas, waste collection areas, and parking garages may be accomplished by placing such areas away from sensitive land uses, restricting activities or operating hours for certain areas, or other design means.</p> <p>With implementation of these measures, this impact would be <i>less than significant</i>.</p>		
<p>Impact 13-6: On-site Noise Levels from Greystar Project. The implementation of the Greystar project could result in new residential, park, and retail land uses that could generate noise from on-site equipment, activities, or</p>	S	<p>Mitigation 13-6: Control Greystar Project Parking Garage Ventilation System Noise Levels. To ensure potential parking garage ventilation systems do not generate noise levels that exceed City standards or otherwise result in</p>	City; Greystar project applicant	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<p>other operations in excess of applicable City standards. This represents a potentially significant impact.</p>		<p>a substantial permanent increase in ambient noise levels, the City shall require the Applicant to prepare an acoustical study that identifies the final type, location, and sound power level of all parking garage ventilation systems. The study shall also document how project noise sources and activities will comply with the exterior sound limits established in Municipal Code Section 9.10.040, Schedule A. The control of noise from ventilation systems may be accomplished by selecting quiet equipment types, siting machinery and equipment inside buildings, within an enclosure (e.g., equipment cabinet or mechanical closets), the installation of louvres or baffles, or other design means.</p> <p>With implementation of these measures, this impact would be less than significant.</p>		
<p>Impact 13-7: Increases in Traffic Noise Levels – Freedom Circle Focus Area Plan. The implementation of the Freedom Circle Focus Area Plan could generate vehicle trips that substantially increase existing and future No Project traffic noise levels and/or exceed City noise and land use compatibility standards. This represents a potentially significant impact.</p>	S	<p>Mitigation 13-7. No feasible mitigation is available.</p>	City; Individual project owners	SU
<p>Impact 13-8: Increases in Traffic Noise Levels – GreyStar Project</p>	LS	N/A	N/A	N/A

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
Impact 13-9: Operational Vibrations – Freedom Circle Focus Area Plan	LS	N/A	N/A	N/A
Impact 13-10: Operational Vibrations – Greystar Project	LS	N/A	N/A	N/A
Impact 13-11: Exposure to Airport-Related Noise – Freedom Circle Focus Area Plan and Greystar Project	LS	N/A	N/A	N/A
<i>POPULATION AND HOUSING</i>				
Impact 14-1: Effects on Population Growth—Plan Area	LS	N/A	N/A	N/A
Impact 14-2: Effects on Population Growth—Greystar Project	LS	N/A	N/A	N/A
Impact 14-3: Population and Housing Displacement Effects—Plan Area	LS	N/A	N/A	N/A
Impact 14-4: Population and Housing Displacement Effects—Greystar Project	LS	N/A	N/A	N/A
Impact 14-5: Temporary Employment Impacts—Plan Area	LS	N/A	N/A	N/A
Impact 14-6: Temporary Employment Impacts—Greystar Project	LS	N/A	N/A	N/A

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<i>PUBLIC SERVICES</i>				
Impact 15-1: Increase in Fire Protection/Emergency Medical Service (EMS) Demands—Plan Area	LS	N/A	N/A	N/A
Impact 15-2: Impacts on Fire Protection/Emergency Medical Service (EMS) Demands-- Greystar Project	LS	N/A	N/A	N/A
Impact 15-3: Increase in Police Service Demands—Plan Area	LS	N/A	N/A	N/A
Impact 15-4: Impacts on Police Service Demands--Greystar Project	LS	N/A	N/A	N/A
Impact 15-5: Impacts on Public Schools—Plan Area	LS	N/A	N/A	N/A
Impact 15-6: Impacts on Public Schools--Greystar Project	LS	N/A	N/A	N/A
Impact 15-7: Impacts on Parks and Recreational Facilities—Plan Area	LS	N/A	N/A	N/A
Impact 15-8: Impacts on Parks and Recreational Facilities--Greystar Project	LS	N/A	N/A	N/A
Impact 15-9: Impacts on Other Public Facilities—Plan Area	LS	N/A	N/A	N/A

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
Impact 15-10: Impacts on Other Public Facilities—Greystar Project	LS	N/A	N/A	N/A
Impact 15-11: Construction Period Impacts—Plan Area	LS	N/A	N/A	N/A
Impact 15-12: Construction Period Impacts—Greystar Project	LS	N/A	N/A	N/A
<i>RECREATION</i>				
Impact 16-1: Impacts on Parks and Recreational Facilities—Plan Area	LS	N/A	N/A	N/A
Impact 16-2: Impacts on Parks and Recreational Facilities—Greystar Project	LS	N/A	N/A	N/A
Impact 16-3: Construction Period Impacts—Plan Area	LS	N/A	N/A	N/A
Impact 16-4: Construction Period Impacts—Greystar Project	LS	N/A	N/A	N/A
<i>TRANSPORTATION</i>				
Impact 17-1: Conflict With Adopted Policies, Plans, or Programs Regarding Roadways—Plan Area	LS	N/A	N/A	N/A

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
Impact 17-2: Conflict With Adopted Policies, Plans, or Programs Regarding Roadways—Greystar Project	LS	N/A	N/A	N/A
Impact 17-3: Impacts on Transit Related to Conflicts with Adopted Policies, Plans, or Programs—Plan Area	LS	N/A	N/A	N/A
Impact 17-4: Impacts on Bicycle Facilities—Plan Area	LS	N/A	N/A	N/A
Impact 17-5: Impacts on Pedestrian Facilities—Plan Area	LS	N/A	N/A	N/A
Impact 17-6: Impacts on Transit Related to Conflicts with Adopted Policies, Plans, or Programs—Greystar Project	LS	N/A	N/A	N/A
Impact 17-7: Impacts on Bicycle Facilities—Greystar Project	LS	N/A	N/A	N/A
Impact 17-8: Impacts on Pedestrian Facilities—Greystar Project	LS	N/A	N/A	N/A
Impact 17-9: Impacts Related to Vehicle Miles Traveled—Plan Area	LS	N/A	N/A	N/A
Impact 17-10: Impacts Related to Vehicle Miles Traveled—Greystar Project	LS	N/A	N/A	N/A

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
Impact 17-11: Hazards Due to Design Features or Incompatible Uses—Plan Area	LS	N/A	N/A	N/A
Impact 17-12: Hazards Due to Design Features or Incompatible Uses—Greystar Project	LS	N/A	N/A	N/A
Impact 17-13: Emergency Access—Plan Area	LS	N/A	N/A	N/A
Impact 17-14: Emergency Access—Greystar Project	LS	N/A	N/A	N/A
<i>UTILITIES AND SERVICE SYSTEMS</i>				
Impact 18-1: Focus Area Plan Inconsistency with General Plan and UWMP Growth Projections. The WSA prepared for the proposed Focus Area Plan includes development in the Plan Area that has not been identified in the General Plan (i.e., exceeds the General Plan land use projections for 2035, the General Plan horizon year), and therefore, because the 2015 Urban Water Management Plan (UWMP) was based on General Plan buildout projections, this WSA is inconsistent with General Plan and UWMP buildout projections. Until the Focus Area Plan development exceeding General Plan growth projections is included in the General Plan and the UWMP (i.e., the 2020 UWMP), the Focus	S	Mitigation 18-1. The WSA prepared for the proposed Focus Area Plan includes development in the Plan Area that has not been identified in the General Plan (i.e., exceeds the General Plan land use projections for 2035, the General Plan horizon year), and therefore, because the 2015 Urban Water Management Plan (UWMP) was based on General Plan buildout projections, this WSA is inconsistent with General Plan and UWMP buildout projections. Until the Focus Area Plan development exceeding General Plan growth projections is included in the General Plan and the UWMP (i.e., the 2020 UWMP), the Focus Area Plan is inconsistent with the General Plan/Urban Water Management Plan, and this	City; Individual project applicants	LS

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Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
Area Plan is inconsistent with the General Plan/Urban Water Management Plan, and this inconsistency would represent a <i>potentially significant project and cumulative impact</i> .		inconsistency would represent a <i>potentially significant project and cumulative impact</i> .		
Impact 18-2: Greystar Project Inconsistency with General Plan and UWMP Growth Projections	LS	N/A	N/A	N/A
Impact 18-3: Project and Cumulative Need for Water, Wastewater, and Storm Drainage System Infrastructure—Plan Area	LS	N/A	N/A	N/A
Impact 18-4: Project and Cumulative Need for Water, Wastewater, and Storm Drainage System Infrastructure—Greystar Project	LS	N/A	N/A	N/A
Impact 18-5: Cumulative Wastewater Pump Station Capacity Impacts—Plan Area. As noted in the Woodard & Curran technical memo conducted for the Focus Area Plan (and discussed above), future wastewater generated by anticipated development in the Focus Area Plan Area is projected to exceed the current combined wastewater capacity of the Northside and Rabello pump stations (46.1 mgd) by 0.2 mgd (for a total of 46.3 mgd), which represents a <i>cumulative wastewater impact</i> . Therefore, the proposed Freedom Circle Focus Area Plan contribution to cumulative pump station capacity at the Northside and Rabello pump	S	Mitigation 18-5. The City shall require individual projects implemented under the Freedom Circle Focus Area Plan (and the future, required comprehensive planning study – e.g., specific plan) to make a fair-share contribution to the wastewater pump station improvements necessary to accommodate cumulative development in Santa Clara. The fair-share contributions for future projects developed under the Focus Area Plan and required comprehensive planning study shall be determined based on a detailed wastewater pump station engineering study prepared by the City and each project’s percent of wastewater	City; Individual project applicants	LS

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See Table 1.1 for definitions.

Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
<p>stations would be a significant cumulative impact.</p>		<p>contribution to cumulative flow capacity needs above the current pump capacity. This mitigation would provide funding for wastewater pump station upgrades, which would reduce the Plan’s contribution to the cumulative impact to a less-than-significant level. The City would be required to plan and construct the improvements. Because the timing of these improvements cannot be guaranteed or estimated at this time (spring 2021), the combined wastewater capacity of the two pump stations could be exceeded by development proposals already under consideration. Therefore, the City shall continually monitor pump station capacity in order to coordinate the pump station improvements with development proposals. Until pump station capacity improvements adequate to accommodate the incremental increases in wastewater flows are completed, the City shall delay individual project building permits. In addition, as a standard condition of approval, each individual project would need to provide sanitary sewer information to the City, and no project would be approved by the City until the City determines that sufficient sewer capacity exists. Implementation of this mitigation measure would reduce Plan cumulative wastewater pump capacity impacts to a less-than-significant level.</p>		

See Table 1.1 for definitions.

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- S = Significant
 - LS = Less than significant
 - SU = Significant unavoidable impact
 - NA = Not applicable

Impacts	Significance Without Mitigation	Mitigation Measures	Mitigation Responsibility	Significance With Mitigation
Impact 18-6: Cumulative Wastewater Pump Station Capacity Impacts—Greystar Project	LS	N/A	N/A	N/A
Impact 18-7: Wastewater Treatment Capacity Impacts—Plan Area	LS	N/A	N/A	N/A
Impact 18-8: Wastewater Treatment Capacity Impacts—Greystar Project	LS	N/A	N/A	N/A
Impact 18-9: Impacts on Solid Waste Disposal and Recycling Service—Plan Area	LS	N/A	N/A	N/A
Impact 18-10: Impacts on Solid Waste Disposal and Recycling Service—Greystar Project	LS	N/A	N/A	N/A
Impact 18-11: Electricity, Natural Gas, and Telecommunications Infrastructure—Plan Area	LS	N/A	N/A	N/A
Impact 18-12: Electricity, Natural Gas, and Telecommunications Infrastructure—Greystar Project	LS	N/A	N/A	N/A

S = Significant
 LS = Less than significant
 SU = Significant unavoidable impact
 NA = Not applicable

See Table 1.1 for definitions.