DETERMINATION OF ELIGIBILITY TO UTILIZE STATUTORY EXEMPTION TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FOR THE 2354 CALLE DEL MUNDO (PARCEL 2) PROJECT

November 2020

1.1 PURPOSE OF MEMORANDUM

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

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

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

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

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

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

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified or the Negative Declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;
    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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

This memorandum analyzes the 2354 Calle Del Mundo (Parcel 2) Project to determine its eligibility for the Government Code Section 65457 statutory exemption. The proposed project would redevelop approximately 0.46 acres located within the western portion of the TESP area which is currently developed with a single-story, light industrial building and associated surface parking lot. The project would demolish the existing building and construct an eight-story building with up to 89 residential units (193 dwelling units per acre).

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

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

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

SECTION 2.0 PROJECT DESCRIPTION

2.1 PROJECT OVERVIEW

The project would redevelop approximately 0.46 acres (APN 097-46-002) of the western portion of the TESP area. The TESP area is approximately 46.0 acres of land within the City of Santa Clara that is currently developed with approximately 708,000 square feet of light industrial/commercial/office space in an existing industrial area. The TESP area is bounded by the former Santa Clara Golf & Tennis Club (which closed in 2019) to the north, Tasman Drive to the south, the Guadalupe River to the east, and Lafayette Street to the west. Refer to Figure 2.1-1 for an aerial photograph of the project site and surrounding land uses.

2.2 PROPOSED PROJECT

2.2.1 Proposed Development

The project site is currently developed with an approximately 6,712-square foot light industrial building and associated surface parking lot on the western side of the TESP area. As proposed, the project would demolish the existing building and construct an eight-story residential building as described below. Please refer to Figures 2.2-1 to 2.2-3 for the site plan and elevations.

The proposed building would consist of 89 residential units and would have a residential density of 193 dwelling units per acre (du/ac).[1] The proposed building would have a maximum height of 88 feet. A total of approximately 4,866 square feet of amenity space would be provided for the residents. The proposed amenities would be located on floors two and three and would include a lounge, courtyard, and fitness space.

Currently, the project site can be accessed via one driveway along Calle Del Mundo which would be removed and replaced with a new driveway along Calle Del Mundo. A total of 75 vehicular parking spaces and 53 bicycle parking spaces are proposed.

2.2.2 Green Building Measures

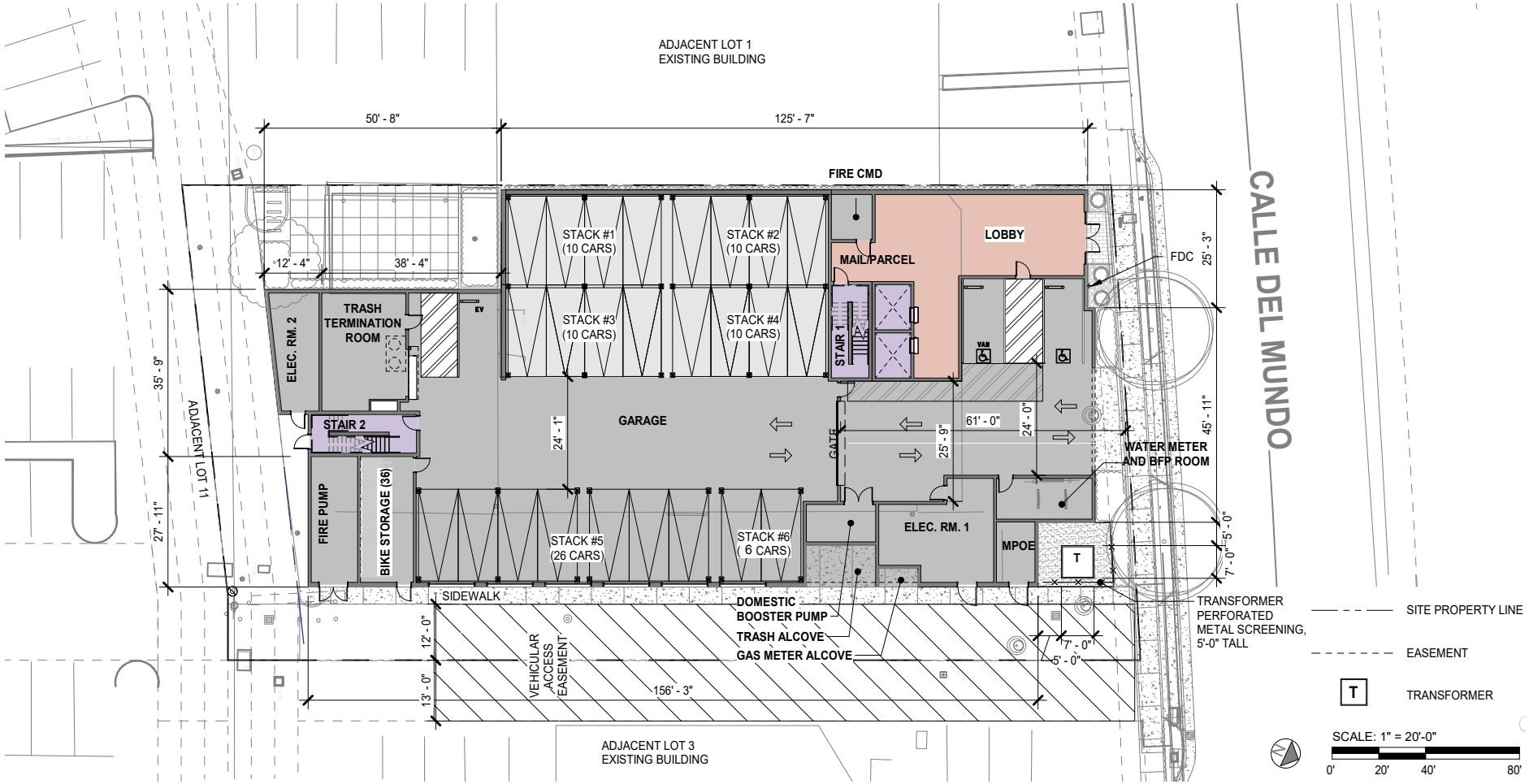
The proposed project would be required to be built in accordance with the California Green Building Standards Code (CALGreen), which includes design provisions intended to minimize wasteful energy consumption. The project would be designed to achieve the minimum Leadership in Energy and Environmental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

As proposed, the project would include the following green building design features:

- Stormwater treatment on-site
- Provide 100 percent electric-vehicle (EV) enabled parking spaces
- Provide 53 bicycle parking spaces on-site
- Provide unbundled parking
- Utilize materials on the roof and all hardscape areas that would reduce the heat island effect

[1] 89 proposed residential units in total / 0.46-acre = 193 du/ac.

AERIAL PHOTOGRAPH AND SURROUNDING LAND USES | FIGURE 2.1-1



SITE PLAN - GROUND LEVEL

FIGURE 2.2-1

ELEVATIONS - NORTH & SOUTH | FIGURE 2.2-2

EAST ELEVATION

WEST ELEVATION

ELEVATIONS - EAST & WEST | FIGURE 2.2-3

- Provide thermal comfort controls for all residential units
- Fifty percent construction and demolition waste management, consistent with the California Integrated Waste Management Board (CIWMB) requirements
- Energy Star appliances

2.2.3 Transportation Demand Management Plan

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

Table 2.2-1: Required/Proposed TDM Measures

Required TESP Measures
Limited parking supply; dedicated electric vehicle (EV) parking
Unbundled residential parking
Participation in the Tasman East Transportation Coordination Group (TETCG); includes transit passes, bikeshare programs, bicycle repair facilities, and commute information/marketing
Transportation coordinator; trip monitoring and reporting
Bicycle parking and amenities; electric scooter corrals
Project-Specific Measures
On-site amenities
Source: Gomez, Rob. Development Associate, Ensemble Real Estate Investments. October 3, 2019.

2.2.4 General Plan and Zoning Designations

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

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

The proposed project would have a density of 193 du/ac, consistent with the *Transit Neighborhood* General Plan and zoning designations.

SECTION 3.0 ENVIRONMENTAL IMPACTS OF THE PROPOSED PROJECT

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

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

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

The proposed project includes the construction of an eight-story building with 89 residential units. This Memorandum analyzes the impacts of the proposed project and consistency with the TESP FEIR in regard to the following environmental issues:

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

3.1 EXISTING SETTING

The project site is currently developed with an approximately 6,712-square foot light industrial building. The project site is bounded by light industrial buildings to the east, west, and south and Calle Del Mundo to the north. There has been no development or other changes to the existing environmental setting since approval of the TESP project in 2018.

3.2 AIR QUALITY

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

3.2.1 Findings of the Previously Certified FEIR

3.2.1.1 *Construction Emissions*

Construction activities from full build out of the TESP may generate dust and other particulate matter (PM_{10} and $PM_{2.5}$) that could temporarily impact nearby land uses, particularly sensitive receptors. In addition, construction equipment and associated heavy-duty truck traffic would generate diesel exhaust, a known toxic air contaminant (TAC) which would pose a community risk to nearby sensitive receptors. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to $PM_{2.5}$.

Construction exhaust emissions include those from equipment (i.e., off-road) and traffic (on-road vehicles and trucks). Off-road construction equipment is often diesel-powered and can be a substantial source of NO_X emissions, in addition to PM_{10} and $PM_{2.5}$ emissions. Architectural coatings and application of asphalt pavement are dominant sources of ROG emissions. The combination of temporary dust from activities and diesel exhaust from construction equipment and related traffic may exceed BAAQMD's project-level thresholds on a project-by-project basis. Additionally, NO_X emissions during grading and soil import/export may exceed the BAAQMD NO_X emission thresholds. The TESP FEIR identified the following air quality impact.

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

The following mitigation measures were included in the TESP FEIR to control dust and reduce construction TAC and criteria pollutant emissions during construction.

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

- All exposed unpaved surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the construction firm regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.
- The contractor shall install temporary electrical service whenever possible to avoid the need for independently powered equipment (e.g. generators).

MM AQ-1.2: Construction criteria pollutant and TAC quantification will be required on a project-level basis for individual development projects once those details are available through modeling to identify impacts and, if necessary, include measures to reduce emissions. The analysis must be submitted for City review and approval, once complete. Health risks from construction TACs shall be reduced below 10 in one million excess cancer cases, a hazard index of 1.0, and $PM_{2.5}$ emissions of 0.3 $\mu g/m^3$. Criteria pollutant emissions shall not exceed BAAQMD construction criteria pollutant emissions thresholds.

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

- Construction equipment selection for low emissions;
- Use of alternative fuels, engine retrofits, and added exhaust devices;
- Low-volatile organic compound paints;
- Modify construction schedule; and
- Implementation of BAAQMD Basic and/or Additional Construction Mitigation Measures for control of fugitive dust.

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

3.2.1.2 *Operational Emissions*

The TESP FEIR concluded that full build out of the TESP would result in long-term area and mobile source emissions from operation of subsequent development. Build out of the TESP would exceed the BAAQMD significance thresholds for reactive organic gases (ROGs) and nitrogen oxides (NO_x). The TESP FEIR identified the following air quality impact.

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

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

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

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

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

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

3.2.1.3 *Toxic Air Contaminants*

CEQA does not address the effects of existing environmental conditions on a project. Nevertheless, the City of Santa Clara addressed the effect of existing local emission sources on future residents in the TESP area as a planning consideration.

The TESP FEIR identified three sources of toxic air contaminants (TACs) and fine particulate matter ($PM_{2.5}$) emissions. The Union Pacific Railroad, Lafayette Street, and Tasman Drive would affect the western portion of the TESP area, within 270 feet of the rail line, and the southern portion of the site, within 110 feet of the Tasman Drive edge of travel lane. Any development proposed within the identified affected areas would expose future sensitive receptors on-site to elevated cancer risk and/or $PM_{2.5}$ concentrations. Therefore, the following Standard Conditions of Approval are included in the project.

Standard Conditions of Approval

- Design the site to limit exposure from sources of TACs and $PM_{2.5}$ emissions. The final site layout shall locate operable windows and air intakes as far as possible from the Union Pacific Railroad line/Lafayette Street and Tasman Drive.
- To the greatest degree possible, plant vegetation along the project site boundaries with Union Pacific Railroad line/Lafayette Street and Tasman Drive and around outdoor use areas. This barrier would include trees and shrubs that provide a dense vegetative barrier.
- Install air filtration at units that have predicted $PM_{2.5}$ concentrations above 0.3 micrograms per cubic meter ($\mu g/m^3$). Air filtration devices shall be rated MERV13 or higher. Alternatively, with the approval of the City, equivalent control technology may be used if it is shown by a qualified air quality consultant or heating, ventilation, and air conditioning (HVAC) engineer that it would reduce risk below significance thresholds.
- As part of implementing this measure, an ongoing maintenance plan for the building's HVAC air filtration system shall be required.
- Ensure that any lease agreements and other property documents (1) require cleaning, maintenance, and monitoring of the affected units for air flow leaks; (2) include assurance that new owners and tenants are provided information on the ventilation system; and (3) include provisions that fees associated with owning or leasing a unit(s) in the building include funds for cleaning, maintenance, monitoring, and replacements of the filters, as needed.
- Require that, prior to building occupancy, an authorized air pollutant consultant or HVAC engineer verify the installation of all necessary measures to reduce cancer risk below 10 chances per million from any source and $PM_{2.5}$ concentrations above 0.3 $\mu g/m^3$ for any source and 0.8 $\mu g/m^3$ for all sources.

3.2.2 Air Quality Impacts Resulting from the Proposed Project

An Air Quality Assessment[2] was prepared by *Illingworth & Rodkin, Inc.* in October 2020. A copy of this report is provided in Appendix A of this document.

3.2.2.1 *CEQA Thresholds of Significance*

Impacts from the Project

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the Lead Agency and must be based to the extent possible on scientific and factual data. The City of Santa Clara has carefully considered the thresholds updated by BAAQMD in May 2017 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and $PM_{2.5}$. The BAAQMD CEQA Air Quality thresholds used in this analysis are identified in Table 3.2-1 below.

Table 3.2-1: BAAQMD Air Quality Significance Thresholds

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

Source: *BAAQMD* CEQA *Thresholds Options and Justification Report (2009)* and *BAAQMD CEQA Air Quality Guidelines* (dated May 2017).

[2] The number of proposed residential units has decreased to 89 and the number of parking spaces has decreased to 75 parking spaces since the air quality analysis was completed. Since the original assessment modeled the larger project, the smaller land uses would result in less construction activity and less construction emissions and community risk impacts.

3.2.2.2 *Construction Emissions – Criteria Pollutants*

Construction period criteria pollutants were estimated using CalEEMod Version 2016.3.2. The proposed land uses were input into CalEEMod, which included 110 dwelling units and 85,425 square feet entered as "Apartments Mid-Rise" and 104 parking spaces entered as "Enclosed Parking with Elevator". Demolition of existing buildings on-site and soil export were also input into CalEEMod (refer to Appendix A).

Additionally, it is assumed that construction of the project would begin in January 2021 for an approximate period of 20 months. Table 3.2-2 below shows the average daily emissions from criteria pollutants during the construction period. The model, assumptions, and results are described further in Appendix A of this document.

Table 3.2-2: Construction Period Criteria Pollutant Emissions

Scenario	ROG	NO_x	PM_{10}	$PM_{2.5}$
Total Construction Emissions (tons)	0.9	2.5	0.1	0.1
Average daily emissions (pounds per day)*	3.5	9.7	0.4	0.4
BAAQMD Thresholds (pounds per day)	***54***	***54***	***82***	***54***
Exceed Threshold?	**No**	**No**	**No**	**No**

**Note: ***Assumes 504 construction workdays

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

3.2.2.3 *Construction – Community Risk Impacts*

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, a known TAC. The primary community risk impacts associated with construction are cancer risk and exposure to $PM_{2.5}$. The U.S. Environmental Protection Agency (EPA) AERMOD dispersion model was used to predict diesel particulate matter (DPM) and $PM_{2.5}$ concentrations at existing sensitive receptors in the vicinity of the project site. The model, assumptions, and results are described further in Appendix A. The maximum-modeled DPM and $PM_{2.5}$ concentrations were identified at nearby sensitive receptors as shown in Figure 3.2-1, below. The maximum-exposed individual (MEI) was located on the first floor of a single-family residence located south of the project site (circled in pink).

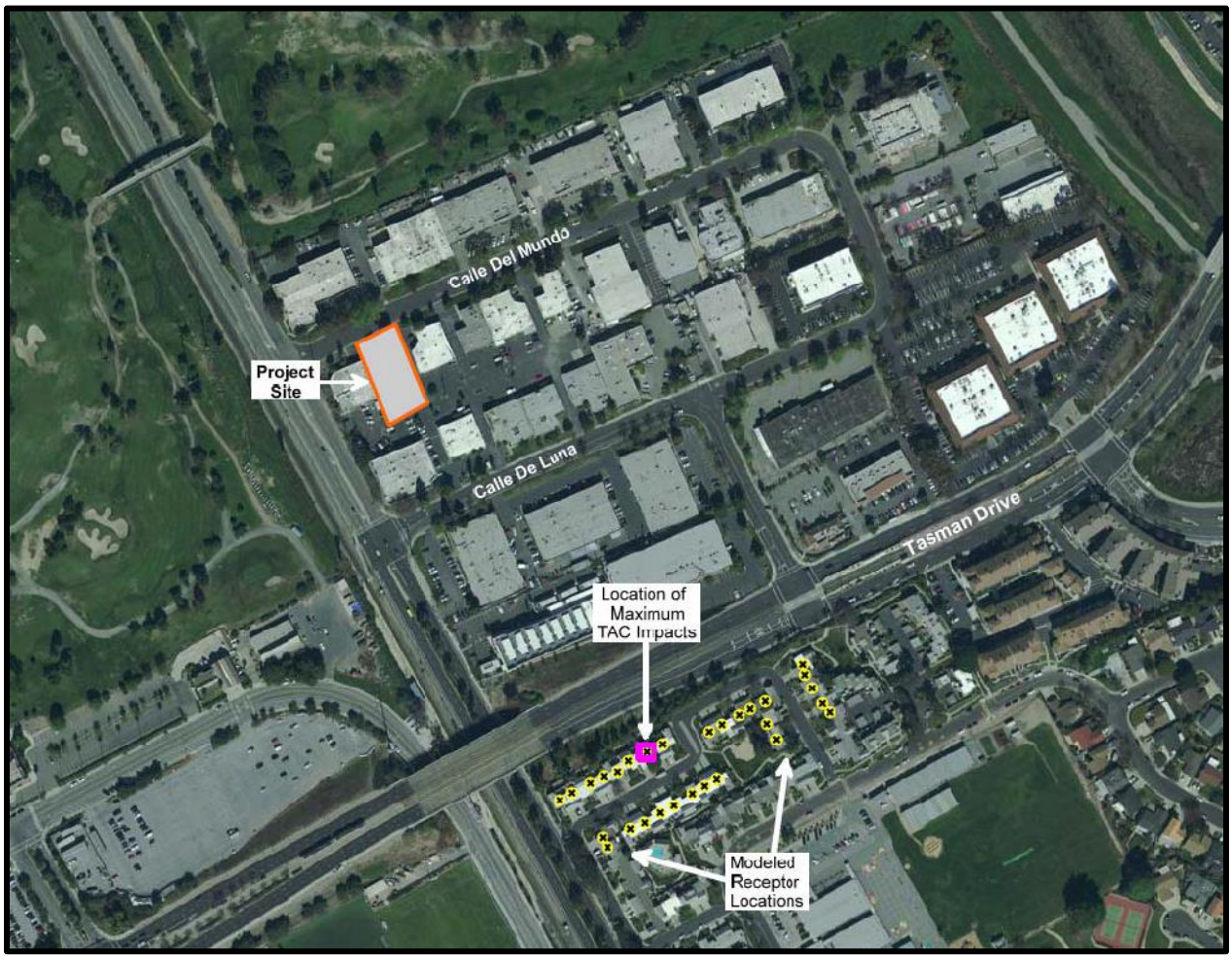


Figure 3.2-1: Location of Sensitive Receptors

Table 3.2-3 provides a summary of the maximum health risk impacts from project construction.

Table 3.2-3: Construction Risk Impacts at the MEI

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Construction (unmitigated)	7.5 (infant)	0.04	0.01
BAAQMD Single-Source Threshold	>10.0	>0.3	>1.0
Exceed Threshold? (unmitigated)	**No**	**No**	**No**

As shown above, the cancer risk and annual $PM_{2.5}$ concentration would not exceed BAAQMD's significance threshold. The proposed project would not result in any new impacts or substantially increase the severity of the previously identified air quality impacts.

Additionally, there are several projects proposed or recently approved within the TESP that could be operational while project construction occurs, depending on the timing of construction.[3] At this time, it is unknown what specific project sites could be occupied by sensitive receptors during the construction of this project. Nevertheless, if project construction were to occur when new residential

[3] No approved projects within the TESP area are currently under construction.

occupants or other sensitive receptors occupy the TESP area, the project shall include the following Condition of Project Approval.[4]

Condition of Project Approval

- All diesel-powered off-road equipment, larger than 25 horsepower, operating on-site for more than two days continuously shall, at a minimum, meet U.S. EPA particulate matter emissions standards for Tier 4 engines or equivalent. Alternatively, the use of equipment that is electrically powered or uses non-diesel fuels would meet this requirement.

While the location of any potential sensitive receptors within the TESP area is not currently known, the use of Tier 4 equipment, or equivalent, represents the most efficient equipment available. Therefore, with implementation of the identified Condition of Project Approval, the proposed project would not result in any new impacts or substantially increase the severity of the previously identified impact.

3.2.2.4 *Operational Emissions – Criteria Pollutants*

As proposed, the project would construct 110 dwelling units on the western portion of the TESP area. Based on the conclusions of the TESP FEIR, all residential development proposed would be required to implement a TDM program and incorporate green building measures into the project. Consistent with mitigation measure AQ-2.1 of the TESP FEIR, the proposed project includes project-specific TDM measures to reduce residential VMT as required by the City's CAP. The CAP requires a minimum 20 percent reduction in VMT, with half that amount (a minimum of 10 percent) being achieved through a TDM plan. Consistent with that mandate, the project applicant proposes the following TDM measures as shown in Table 3.2-4 below.

Table 3.2-4: Required/Proposed TDM Measures

Required TESP Measures
Limited parking supply; dedicated electric vehicle (EV) parking
Unbundled residential parking
Participation in the Tasman East Transportation Coordination Group (TETCG); includes transit passes, bikeshare programs, bicycle repair facilities, and commute information/marketing
Transportation coordinator; trip monitoring and reporting
Bicycle parking and amenities; electric scooter corrals
Project-Specific Measures
On-site amenities

Source: Gomez, Rob. Development Associate, Ensemble Real Estate Investments. October 3, 2019.

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

- Stormwater treatment on-site

[4] Divine, Casey. Illingworth & Rodkin, Inc. Personal Communication. November 26, 2019. Although the receptor locations are currently unknown, Tier 4 mitigation is the maximum control measure available for construction equipment engines.

- Provide 100 percent EV enabled parking spaces
- Provide 53 bicycle parking spaces on-site
- Provide unbundled parking
- Utilize materials on the roof and all hardscape areas that would reduce the heat island effect
- Provide thermal comfort controls for all residential units
- Fifty percent construction and demolition waste management (per the City's Construction and Demolition Debris Recycling Program)
- Energy Star appliances

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

3.2.2.5 *Combined Community Risk Impacts at Construction MEI*

Community health risk assessments typically look at all sources of TACs (including highways, streets, and stationary sources identified by BAAQMD) within 1,000 feet of a project site. Tasman Drive and Lafayette Street are mobile sources of TACs. The Union Pacific Railroad (UPRR) is also in proximity, which generates TAC and $PM_{2.5}$ emissions from diesel locomotives. Additionally, stationary sources identified in the TESP FEIR that could affect the plan area were also evaluated. Stationary sources that were deemed to pose no risk or would no longer pose a risk due to removal were not evaluated in the cumulative community risk impact assessment.

Roadway

Traffic on high volume roadways (10,000 average daily trips [ADT] or more) is a source of TAC emissions that may adversely impact sensitive receptors in close proximity to the roadways. The construction MEI is located approximately 90 feet south of Tasman Drive (45,000 ADT) and 270 feet east of Lafayette Street (30,000 ADT). The BAAQMD's *Roadway Screening Analysis Calculator* was used to assess whether the roadways would have a potentially significant effect on the construction MEI.

Railroad

The UPRR is located approximately 370 feet west of the construction MEI. Based on the TESP FEIR, the rail line was estimated to have a cancer risk of 22.0 cases per one million individuals, an annual $PM_{2.5}$ concentration of 0.03 $\mu g/m^3$, and an HI of less than 0.01 at 110 feet.

Stationary Sources

The Air Quality Assessment identified several stationary sources within the TESP area and within 1,000 feet of the project site. They are Plant #1642, Plant #1636, Plant #3037, Plant #22529, Plant #17251, Plant #5323, Plant #11297. Two of the identified facilities have been closed (Plant #5323

and Plant #11297) and are not discussed further. Another stationary source was identified that was not included in the TESP (Plant #20241).[5]

TESP Cumulative Projects

At the time the Air Quality Assessment was completed, five other projects proposed within the TESP area were identified. The projects are located at: 2200 Calle De Luna, 2300 Calle De Luna, 2233 Calle Del Mundo, 2354 Calle Del Mundo, and 5185 Lafayette Street. The construction impacts from the five TESP projects were analyzed at the project construction MEI and included in the cumulative health risk assessment (refer to Attachment 3 of Appendix A for more information). Figure 3.2-2 below shows the project site, nearby sources of TACs, and the five TESP projects. Table 3.2-4 summarizes the TAC sources near the project site.

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

[5] Divine, Casey. Illingworth & Rodkin, Inc. Personal Communication. November 26, 2019. The 2012 stationary source information database was used when the TESP was prepared. Since then, there has been a 2014 and 2017 database which identifies new or previously un-identified sources. Plant #20241, which is shown in the 2017 database, was not registered with BAAQMD until after the TESP EIR was completed.

Table 3.2-4: Stationary and Mobile Sources Community Risk Levels			
Source	**Maximum Cancer Risk (per million)**	**Maximum Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)**	**Maximum Hazard Index**
Project Construction Unmitigated	7.5 (infant)	0.04	0.01
Five TESP Construction Projects	6.0 (infant)	0.02	<0.01
Tasman Drive at 90 feet	11.3	0.42	<0.03
Lafayette Street at 270 feet	4.4	0.15	<0.03
UPRR Line at 370 feet[1]	<22.0	<0.03	<0.01
Megastor (Plant 1642) at 260 feet	-	<0.01	-
Alzeta Corporation (Plant 1636) >1,000 feet	<0.1	<0.01	<0.01
Italix Company, Inc. (Plant 3037) at >1,000 feet	<0.1	0.01	<0.01
Nu-Metal Finishing (Plant 22529) at >1,000 feet	<0.1	<0.01	<0.01
City of Santa Clara – Golf Course Storm[2] (Plant 17251) at 940 feet	0.3	<0.01	<0.01
RS Alameda, LLC. (Plant 20241) at 260 feet	1.5	<0.01	<0.01
Combined Total	<53.3	<0.72	<0.14
BAAQMD Threshold – Combined Sources	***>100***	***>0.8***	***>10.0***
Threshold Exceeded? (Unmitigated)	***No***	***No***	***No***

Notes: [1] The UPRR was previously analyzed in the TESP FEIR which determined that build out of the TESP site would result in a maximum cancer risk of 22.0 cases per one million. Therefore, any impacts at the construction MEIs would be less than 22.0 cases per one million.

[2] "City of Santa Clara - Golf Course Storm" is what BAAQMD has listed as the name of this facility. It is likely supposed to be "stormwater" and may be some equipment (not a generator) within a stormwater facility of the golf course.

As shown above, the project (without mitigation included) would be below BAAQMD's significance threshold for combined sources at the construction MEI, consistent with the findings of the TESP FEIR.

3.2.2.6 *Toxic Air Contaminants – Planning Considerations*

Due to the location of the proposed project, future residences would be exposed to an elevated cancer risk and/or $PM_{2.5}$ concentrations. Based on Figure 3.2-3 below or Figure 3.2-1 of the TESP FEIR[6], MERV13 (or higher) filters would be required for all areas affected by air pollutant sources as a Condition of Project Approval.

[6] City of Santa Clara. *Draft Environmental Impact Report Tasman East Specific Plan (SCH #2016122027)*. July 2018.

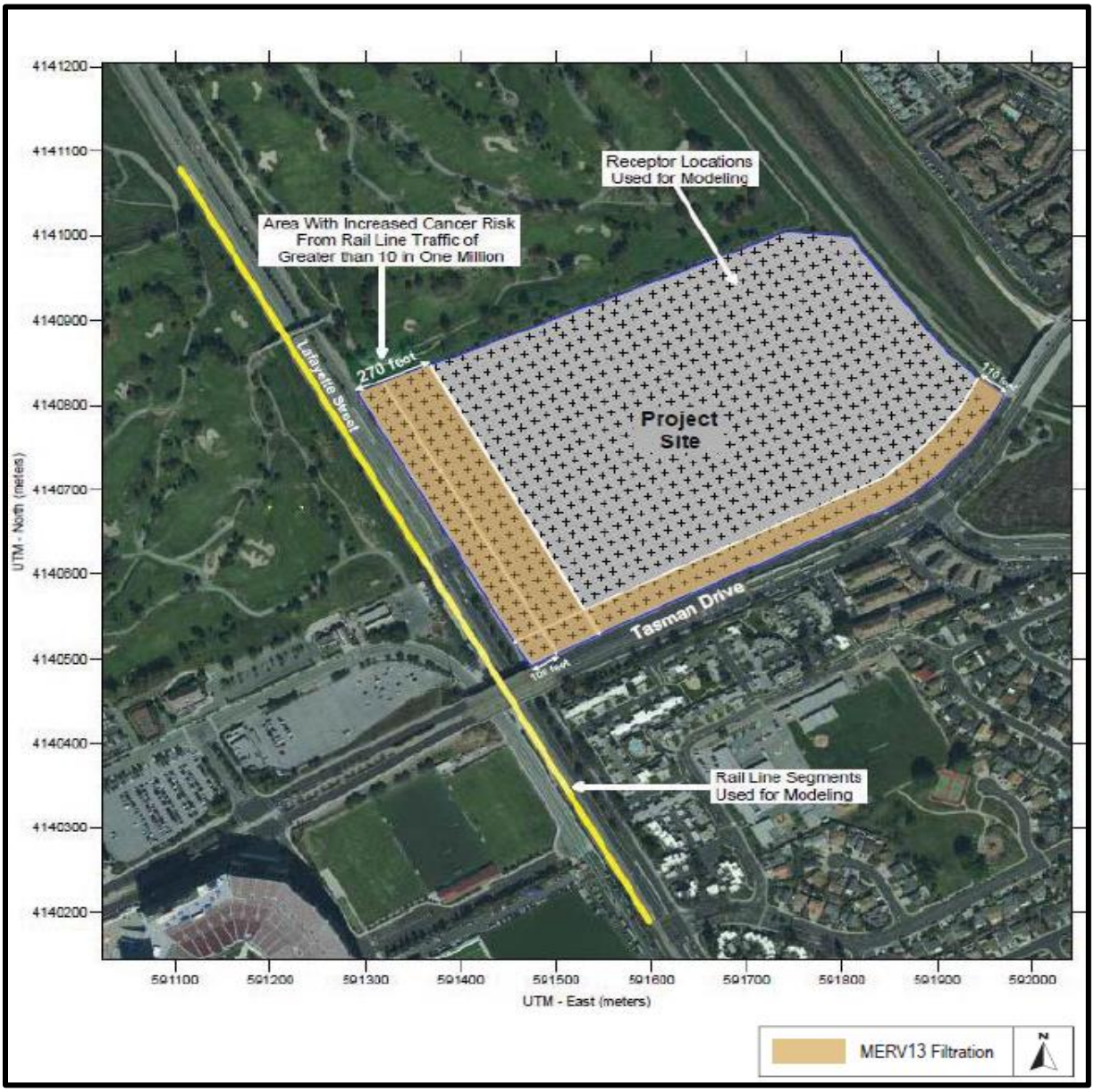


Figure 3.2-3: Residential Areas Requiring MERV12 Filtration

The TESP FEIR concluded that implementation of the Condition of Project Approval would reduce the cancer risk and $PM_{2.5}$ concentrations below BAAQMD's significance thresholds for sensitive receptors.

3.3 BIOLOGICAL RESOURCES

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

The project site is classified as developed land with no sensitive habitats or special-status species present and, as a result, implementation of the proposed project would not contribute to any identified impacts to protected habitats and special-status species and no further analysis of these resources is required.

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

3.3.1 Findings of the Previously Certified FEIR

3.3.1.1 *Bird Strikes*

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

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

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

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

- Reduce the extent of glass on the facades of new buildings and additions to the extent feasible.
- Reduce or eliminate the visibility of landscaped areas behind glass.
- No more than 10 percent of the surface area of a building's total exterior façade shall have untreated glazing between the ground and 60 feet above ground, unless located within 300 feet of the top of bank of the Guadalupe River within such boundary this requirement would extend to the entirety of the structure. Bird-safe glazing treatments may include fritting, netting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing or ultraviolet patterns visible to birds. Vertical elements of the window patterns should be at least 0.25 inches wide at a maximum spacing of four inches or have horizontal elements at least 0.125 inches wide at a maximum spacing of two inches. Any remaining untreated glazed areas will be broken up into sections no greater than 24 square feet in size by mullions or bird-safe glazing treatments.
- Avoid free-standing clear glass walls, skywalks, transparent building corners, glass enclosures (e.g., greenhouses) on rooftops, and balconies with unbroken glazed segments 24 square feet and larger where feasible.

If any such features are included in building designs, all glazing used in any such features will be 100 percent treated.

- Reduce glass at tops of buildings, especially when incorporating a green roof into the building design.
- If a green roof or green wall is incorporated into the building design, no more than 10 percent of the surface area of the building's combined facades within 12 vertical feet above and/or below the green roof or green wall shall have untreated glazing. Any remaining untreated glazed areas will be broken up into sections no greater than 24 square feet in size by mullions or bird-safe glazing treatments.
- Avoid the funneling of flight paths between buildings or trees towards a glazed building façade.
- Landscaping, including planted vegetation and water features, shall be designed to minimize the potential for collisions. For example, vegetation providing particularly valuable resources to birds (such as fruits) will be planted away from buildings with extensive glazing, and vegetation in general will be planted in such a way that it is not clearly reflected in windows. Water features would be located away from building exteriors to reduce the attraction of birds toward glazed facades.
- Minimize exterior lighting to the extent feasible, except as needed for safety. All exterior lights shall be directed toward facilities in the Plan Area (e.g., rather than directed upward or outward) and shielded to ensure that light is not directed outward toward the Guadalupe River or Ulistac Natural Area.
- Occupancy sensors or other switch control devices shall be installed on interior lights, with the exception of emergency lights or lights needed for safety purposes. On commercial buildings, these lights shall be programmed to shut off during non-work hours and between 10:00 p.m. and sunrise.

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

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

3.3.1.2 *Increased Lighting*

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

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

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

MM BIO-4.1: To the extent consistent with the normal and expected operations of commercial and/or residential uses under the TESP, take appropriate measures to avoid use of unnecessary lighting at night, especially during the bird migration season (February through May and August through November). Such measures may include the installation of motion-sensor lighting, automatic light shut-off mechanisms, downward-facing exterior light fixtures, and others. Exterior lighting within the Specific Plan area will be shielded as needed to block illumination from shining upward, or outward into the Guadalupe River to the east or Ulistac Natural Area to the south. Lighting plans for each development site shall be reviewed and approved by the Community Development Director prior to the issuance of building permits.

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

3.3.1.3 *Trees*

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

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

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

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

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

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

With implementation of the identified mitigation measures, development under the TESP area would have a less than significant impact related to trees.

3.3.2 Biological Resources Impacts Resulting from the Proposed Project

3.3.2.1 *Bird Strikes*

The project would construct an eight-story building on Parcel 2 with a maximum height of 88 feet. The proposed project is located approximately 1,680 feet west of the Guadalupe River and approximately 1,690 northwest of the Ulistac Natural Area. The project would be surrounded by urban development in the future and would not be located adjacent to any natural open space. Nevertheless, the TESP FEIR concluded that all new buildings proposed within the TESP area would have the potential for bird strikes and are required to incorporate bird safe design features.

In November 2020, *H.T. Harvey & Associates* prepared an Avian Collision Risk Assessment for the proposed project. A copy of this report is provided in Appendix B. The following analysis outlines the project's design elements and its compliance with mitigation measure BIO-3.1.

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

The building façades would be composed of opaque panels broken up by small windows. Most of the western building façade would have no windows, which helps reduce glazing on the building. The first floor of the building would have no glazing. As a result, the project design would comply with this requirement.

Prohibit the visibility of interior landscaped areas behind glass

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

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

No bird-safe glazing is currently proposed as part of the building design. As stated in MM BIO-3.1, the City may waive or reduce any of the bird-safe design requirements based on analysis by a qualified biologist indicating that proposed construction will not pose a collision hazard to birds. Based on the Avian Collision Risk Assessment prepared for the project, the frequency of avian collisions to the proposed building on-site would be lower compared to other sites within the TESP area due to its distance to the Ulistac Natural Area (approximately 1,690 feet southeast) and to the Guadalupe River (approximately 1,680 feet east). Since the project site is surrounded by development, any new landscape vegetation on-site would provide limited resources for native birds regardless of the tree species that would be used.

Per the assessment, no areas of high collision risk were identified on the proposed building. As a result, no bird-safe treatment would be necessary, and the project design would comply with this requirement.

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

No free-standing glass walls, skywalks, transparent building corners, glass enclosures on rooftops or balconies are proposed as part of the building design. The project design would comply with this requirement.

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

The façade below the roof and the third floor courtyard would have opaque wall panels broken up by small individual windows which reduces glazing at the top of the building where the green roofs (i.e., open space larger than balconies/patios) are proposed. As a result, the project design would comply with this requirement.

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

Based on a review of the plans, no green walls are proposed as part of the project. The project proposes a green roof on the third floor courtyard/flow-through planter, which could result in bird collisions due to the proposed vegetation. The façades within 12 feet above and/or below the third floor courtyard would, however, consist of opaque wall panels broken up by small individual windows and would reduce glazing 12 feet above and below the courtyard. As a result, no bird-safe treatments would be necessary, and the project design would comply with this requirement.

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

The proposed building does not include any features that would funnel birds toward a glazed surface. The project design would comply with this requirement.

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

No water features are proposed and no landscape plan has been provided at the time the assessment was prepared. For the purposes of this analysis, it is assumed that vegetation and trees may be planted in the proposed exterior open spaces. Any vegetation proposed is anticipated to produce food or flowers that are attractive to birds.

As mentioned previously, the building façades would consist of opaque wall panels broken up by small windows which would help reduce bird collisions even if vegetation is planted in adjacent areas. Nevertheless, consistent with mitigation measure BIO-3.1, the project shall be required to include the following measure as a Condition of Project Approval.

Condition of Project Approval

- Landscape vegetation with flowers and fruits shall be removed from any planted areas located immediately adjacent to untreated glazed areas.

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

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

To ensure that the project minimizes exterior lighting to the extent feasible, the project shall comply with the exterior Leadership in Energy and Environmental Design (LEED) Pilot Credit 55 lighting requirement as follows:

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

- Exterior up-lighting in the project design shall be avoided.

The proposed project is located approximately 1,680 feet west of the Guadalupe River and approximately 1,690 northwest of the Ulistac Natural Area. The Avian Collision Risk Assessment concluded that unshielded exterior lighting in public areas would not spill outwards into these natural areas. As a result, shielding and direct lighting on-site would not be needed to comply with this requirement.

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

As discussed above, the project would comply with the exterior LEED Pilot Credit 55 lighting requirement which would be adequate to minimize bird collisions with the building due to lighting.

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

3.3.2.2 *Increased Lighting*

The proposed project would include internal building lights, parking garage lights, security lights, and external building lights. While the TESP FEIR identified increased lighting on-site as an impact on bird species in the high value habitat areas on and adjacent to the TESP area, the project site is not located near these habitat areas and is already developed. Consistent with mitigation measure BIO-4.1, exterior lighting shall be directed downward (not upward into the sky) to the fullest extent feasible. Furthermore, the project will undergo architectural and site design review by the Community Development Director prior to issuance of building permits, consistent with Mitigation Measure BIO-4.1, to ensure that the project would not adversely impact bird species. As a result, the proposed project would not result in any new impacts or substantially increase the severity of the previously identified impact.

3.3.2.3 *Trees*

For the purposes of this analysis, it is assumed that the project would remove all existing trees on-site. A Tree Survey was prepared by David J. Powers & Associates in January 2020. The trees are listed in Table 3.3-1 below. Refer to Figure 3.3-1 for the tree location map.

TREE LOCATION MAP

FIGURE 3.3-1

Table 3.3-1: Trees Surveyed On-Site			
Tree Number	**Common Name**	**Scientific Name**	**Diameter (in inches)**
1	Blackwood Acacia	*Acacia melanoxylon*	13.5
2	Blackwood Acacia	*Acacia melanoxylon*	2.9
3	Blackwood Acacia	*Acacia melanoxylon*	6.0
4	Blackwood Acacia	*Acacia melanoxylon*	9.1
5	Blackwood Acacia	*Acacia melanoxylon*	4.6
6	Blackwood Acacia	*Acacia melanoxylon*	11.6
7	Blackwood Acacia	*Acacia melanoxylon*	14.6
8	Blackwood Acacia	*Acacia melanoxylon*	15.1
9	Blackwood Acacia	*Acacia melanoxylon*	27.1
10	Olive	*Olea europaea*	54.1

Consistent with mitigation measure BIO-10.2 and General Plan Policy 5.3.1-P10, any tree removed would be required to be replaced at a 2:1 ratio on-site, which would mandate at least 20 new trees for this project. The proposed project would not result in any new impacts or substantially increase the severity of the previously identified impact.

3.4 HAZARDS AND HAZARDOUS MATERIALS

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

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

3.4.1 Findings of the Previously Certified FEIR`

Based on the TESP FEIR, the project site historically consisted of agricultural land including row crops and orchards. A leaking underground storage tank (LUST) case located at 2200 Calle De Luna was discussed in the TESP FEIR. In addition, four facilities within the TESP area have been identified in the Regional Water Quality Control Board's (RWQCB) Spills, Leaks, Investigations, and Cleanup (SLIC) database. Of the four on-site facilities, three are currently identified as open cases as discussed below.

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

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

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

The two remaining SLIC cases at 2278 Calle De Luna (Coatek, Inc.) and 2200 & 2222 Calle De Luna (Air Flight Service) are being overseen by the Santa Clara County Department of Environmental Health (SCCDEH). The Air Flight Service property was found to have elevated levels of TPH as diesel (TPHd) that are unrelated to the prior film processing done on the property. The Coatek, Inc. property was found to have elevated nickel and copper concentrations related to the industrial land use activities on the southern portion of the TESP area. Oil, grease, trichloroethene (TCE), TPH as motor oil (TPHmo), hexavalent chromium, and benzene concentrations were also found to be elevated above residential screening levels. Both facilities have entered into Voluntary Cleanup Agreements with SCCDEH.

All Purpose Landfill

The former Santa Clara All Purpose Landfill (landfill) is a closed municipal landfill with a footprint of approximately 136 acres located adjacent to the TESP area. Portions of the landfill have been converted into a public golf course, although the golf course closed permanently in October 2019, and the remainder is open space. The landfill consists of four parcels: 1, 2, 3/6, and 4. Parcel 2 is located adjacent to the north of the TESP area and Parcel 4 is across Lafayette Street to the west. Parcels 1 and 3/6 are located further to the north and northwest.

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

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

MM HAZ-1.1: Prior to the start of any demolition or construction activity, a property-specific Phase I Environmental Site Assessment (ESA) shall be completed in accordance with American Society for Testing and Materials (ASTM) Standard Designation E 1527-13 (or most recent version) to identify Recognized Environmental Conditions, evaluate the property history, and establish if the property is likely to have been impacted by chemical releases.

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

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

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

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

- *Corrective Action Plan*. An appropriate corrective action plan (e.g. remedial action plan, removal action workplace, etc.) shall be prepared that reflects the results of the above investigations. Site cleanup levels presented in the plan shall be based on a target cancer risk of 0.00001 or, for non-carcinogens, a target hazard quotient (THQ) of 1.0. The lower of the then-current DTSC, RWQCB, or EPA residential screening levels shall be used to interpret the TR and THQ levels or, alternatively, a site-

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

- *Air Monitoring Plan*. This plan shall assess the potential for exposure of construction workers and neighboring occupants adjoining the property to COCs during construction activities; this plan shall specify measures to be implemented if COC concentrations exceed threshold values.

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

monitoring of the vapor intrusion mitigation system) and described in the OMMP.

MM HAZ-1.5: A Site Management Plan (SMP) and Health and Safety Plan (HSP) shall be developed to establish appropriate management practices for handling and monitoring of impacted soil, soil vapor, and groundwater that potentially may be encountered during construction activities. The SMP shall be prepared by an Environmental Professional and be submitted to the overseeing regulatory agency (e.g. RWQCB, DTSC and/or DEH) for review and approval prior to commencing construction activities. The SMP also shall be provided to the City of Santa Clara. Prior to the start of any construction activity that involves below ground work (i.e. mass grading, foundation construction, excavating or utility trenching), information regarding site risk management procedures, including copies of the HSP and SMP, shall be provided to the contractors for their review, and each contractor shall provide such information to its subcontractors. The SMP and HSP measures shall be incorporated into the project design documents:

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

be accepted. The DTSC's Clean Fill Advisory (October 2001 or latest version) provides useful guidance on evaluating imported fill;

- Methods to monitor excavations and trenches for the potential presence of VOC impacted vapors. Mitigation protocols shall be developed and implemented in the event elevated VOC vapors are released during excavation activities that may pose a risk to construction worker health and/or risk to the health of occupants of neighboring properties;
- Protocols to evaluate if the residual contaminants will adversely impact the integrity of below ground utility lines and/or structures (i.e. the potential for corrosion due to subsurface contamination)
- Measures to reduce soil vapor and groundwater migration through trench backfill and utility conduits. Such measures shall include placement of low-permeability backfill "plugs" at specified intervals on-site and at all locations where the utility trenches (within impacted soil or groundwater) extend off-site. In addition, utility conduits that are placed below groundwater shall be installed with water-tight fittings to reduce the potential for groundwater to migrate into the conduits.
- Measures to help reduce the potential for the downward migration of contaminated groundwater if deep foundation systems are proposed. These measures shall be identified in the geotechnical investigation report and implemented as part of the development plans.

MM HAZ-1.6: The project applicant's environmental professional shall assist in the implementation of the SMP and shall, at a minimum, perform part-time observation services during demolition, excavation, grading and trenching activities. Upon completion of construction activities, the environmental professional shall prepare a report documenting compliance with the SMP; this report shall be submitted to the oversight regulatory agency and the City of Santa Clara.

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

3.4.2 Hazards and Hazardous Materials Impacts Resulting from the Proposed Project

The project would demolish the existing building on-site and construct an eight-story building with up to 89 dwelling units on the western portion of the TESP area. Groundwater on-site has been encountered at a depth ranging from six to 12.5 feet below the ground surface (bgs) and flows in the north to northeast direction. Fluctuations in the groundwater level may occur due to seasonal changes, variations in rainfall, and underground drainage patterns.

Consistent with mitigation measures HAZ-1.1 and HAZ-1.2, a Phase I Environmental Site Assessment (ESA) and Phase II ESA dated February 2019, was completed by *Roux Associates, Inc.* for the project site. Copies of the reports are provided in Appendices C and D, respectively.

Phase I Environmental Site Assessment

On-Site Sources of Contamination

Based on a review of the project site, the site is listed within the Certified Unified Program Agency (CUPA) database for the generation of 100 kilograms and five tons of unknown material. The record was opened in 1996 and last updated 1999, however, no tonnage of material was associated with the site. The unknown material is likely associated with the off-site facility that was temporarily leased from 1996 through 1999 at 5191 Lafayette Street. Based on the records of the off-site facility at 5191 Lafayette Street and the activities associated with the existing building, this listing is not considered a recognized environmental concern (REC).

Off-Site Sources of Contamination

Within a one-mile radius of the project site, 52 off-site facilities were identified on various databases. None of the off-site facilities represent a significant environmental concern for the site because 1) no violation was reported and 2) the distance of the facility from the project site and/or the location of the release relative to groundwater flow.

Phase II Environmental Site Assessment

In February 2019, *Roux Associates* prepared a Phase II ESA to assess the potential impact of residual contamination from past agricultural operations. Six soil borings (RB-1 to RB-6) were advanced and analyzed for pesticides, metals, and semi volatile organic compounds (SVOCs). Additionally, a base rock sample (below the slab of the existing building) was analyzed for asbestos and a sub-slab soil vapor sample (below the slab of the existing building) was collected for VOCs. The results of the analysis were compared to RWQCB ESLs.

Based on the findings of the Phase II ESA, concentrations of 4,4'-DDD, 4,4'-DDE, 4,4'-DDT, arsenic, barium, beryllium, cadmium, chromium, cobalt, copper, lead, mercury molybdenum, nickel, vanadium, and zinc were found above laboratory reporting limits. Arsenic was the only chemical detected at concentrations that exceeded the commercial/industrial ESLs. The maximum detected concentration of arsenic was below the naturally occurring background concentration found in this region.

There are no ESLs established for total chromium. Total chromium was found in all soil samples ranging from 48 mg/kg to 100 mg/kg. Based on a review of chromium data at 2266 Calle De Luna, the total chromium concentrations represent background concentrations.

No asbestos was detected in the base rock sample. The sub-slab soil vapor detected concentrations of ethanol, hexane, and heptane above the laboratory limit. There are no established ESLs for these compounds. As a result, concentrations of ethanol, hexane, and heptane would not be a contaminant of concern.

Consistent with the TESP FEIR, the project would be required to implement mitigation measures HAZ-1.4 to HAZ-1.6 to ensure that the proposed development would not exacerbate any potentially existing hazardous materials contamination. The proposed development would not result in any new impacts or substantially increase the severity of the previously identified impact.

3.5 HYDROLOGY AND WATER QUALITY

The following analysis addresses the potential hydrology and water quality impacts that would result from implementation of the proposed project. Specifically, the following discussion addresses the potential for off-site flooding resulting from development of the project site. In addition, the analysis addresses the projects consistency with the Municipal Regional Stormwater NPDES Permit (MRP).

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

3.5.1 Findings of the Previously Certified FEIR

3.5.1.1 *Post-Construction Stormwater Treatment*

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

3.5.2 Hydrology and Water Quality Impacts Resulting from the Proposed Project

3.5.2.1 *Post-Construction Stormwater Treatment*

Consistent with the TESP FEIR, the proposed project would be required to comply with the MRP and NPDES requirements. The project proposes to treat runoff from the project site with a media filter and flow-through planter boxes. The final stormwater control plan will be reviewed and approved by the City at the development permit stage. Therefore, the proposed project would not result in any new impacts or substantially increase the severity of the previously identified hydrology and water quality impacts.

3.6 NOISE

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

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

3.6.1 Findings of the Previously Certified FEIR

CEQA does not address the effects of existing environmental conditions on a project. Nevertheless, the City of Santa Clara addressed the effect of existing noise sources on future residents in the TESP area as a planning consideration.

The predominant sources of noise that affect the noise environment within the TESP area and at nearby land uses results primarily from vehicular traffic along Lafayette Street and Tasman Drive. Traffic along the local streets within the TESP area which include Calle Del Mundo and Calle De Luna, also affect the ambient noise environment. Aircraft associated with Norman Y. Mineta San José International Airport and trains passing along the Lick Mill Light Rail Transit Station and Great America Station also contribute to the noise environment in the area. Levi's Stadium, approximately 1,937 feet away from the project area, periodically contributes to the noise environment during large events such as NFL games and concerts. Based on findings from the 2009 Stadium EIR[7], residences within 2,000 feet of the stadium would experience elevated exterior noise levels during events. In mid/high density residential developments, private terraces or balconies are not typically considered sensitive to exterior noise levels. Aircraft noise exposure throughout the TESP area exceeds 55 dBA CNEL, and it is not normally feasible to reduce aircraft noise in outdoor activity areas. The following Conditions of Approval were included in the TESP FEIR to reduce exterior noise levels at common outdoor activity areas consistent with the City's General Plan:

- Do not locate common outdoor activity areas immediately adjacent to Tasman Drive, Lafayette Street, or the future Lick Mill Boulevard extension.

- Utilize site planning by placing outdoor activity areas in courtyards, on shielded podium levels (sky gardens) or rooftops, or behind buildings adjoining Tasman Drive, Lafayette Street, and Lick Mill Boulevard. Development adjacent to existing and planned open space shall be designed to provide shielding of the open space from Tasman Drive, Lafayette Street, and Lick Mill Boulevard.

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

According to the TESP FEIR, future interior noise levels at the plan area would be up to 55 dBA CNEL, exceeding the 45 dBA CNEL threshold of the Santa Clara General Plan. The TESP FEIR includes the following Conditions of Approval to reduce interior noise levels to 45 dBA CNEL or less.

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

- Assuming a conservative estimated ratio of 30 percent windows/doors to total wall area, preliminary calculations indicate that the facades of high-density residential buildings having line-of-sight to Lafayette Street would require windows and doors with a minimum STC rating of 30 to meet the interior noise threshold established by the City.
- Along the façades having direct line-of-sight to Tasman Drive and Lick Mill Boulevard, the minimum required STC for windows and doors would be 26.
- Provide a suitable form of forced-air mechanical ventilation, as determined by the Community Development Director, for all residential units in the plan area so that windows can be kept closed at the occupant's discretion to control interior noise and achieve the interior noise standards.
- A qualified acoustical consultant shall review the final site plans, building elevations, and floor plans of the proposed residential buildings and make recommendations for noise insulation to reduce interior noise levels to 45 dBA CNEL or less. Treatments would include, but are not limited to, forced-air mechanical ventilation systems, sound-rated wall and window constructions, acoustical caulking, protected ventilation openings, etc. The specific determination of what noise insulation treatments are necessary shall be conducted during final design of the project. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City, along with the building plans and approved design, prior to issuance of a building permit.

3.6.2 Noise Impacts Resulting from the Proposed Project

In October 2020, *Illingworth & Rodkin, Inc.* prepared an Interior Noise Assessment[8] for the proposed project. A copy of this report is provided in Appendix E.

3.6.2.1 *Interior Noise Levels*

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

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

[8] The number of proposed residential units, amenity space, and number of parking spaces have decreased since the noise and vibration assessment was completed. The changes to the project would not change the conclusions of the analysis.

Conditions of Project Approval

- The west façade of the building shall have windows and doors with a STC rating of 33 or greater to meet the interior noise threshold established by the City.
- The remaining façades shall have windows and doors with a minimum STC rating of 28.
- A suitable form of force-air mechanical ventilation, as determined by the local building official, shall be provided to all residential units on-site so that windows can be kept closed at the occupant's discretion.
- If substantive changes are made to the design of the project prior to building department submittal, a qualified acoustical consultant shall confirm the noise insulation recommendations based on the final site plans, building elevations, and floor plans of the proposed residential buildings. Results of the analysis, including the description of the necessary noise control treatments, shall be submitted to the City, along with the building plans and approved design, prior to issuance of a building permit.

With implementation of the Conditions of Approval identified above, the proposed project would not result in any new impacts or substantially increase the severity of the previously identified impact.

3.6.2.2 *Exterior Noise Levels*

As proposed, a courtyard would be located on the third floor. No balconies are proposed. Consistent with the TESP FEIR, none of the common outdoor areas would be immediately adjacent to Tasman Drive, Lafayette Street, or the future Lick Mill Boulevard extension. Therefore, the project would meet the City's noise standards and would be consistent with the findings of the TESP FEIR.

3.7 CONCLUSION

Based on the above analysis and discussion, no substantive revisions are needed to the TESP FEIR, because no new significant impacts or impacts of substantially greater severity would result from the proposed project. There have been no changes in circumstance in the project area that would result in new significant environmental impacts or substantially more severe impacts, and no new information has come to light that would indicate the potential for new significant impacts or substantially more severe impacts than were discussed in the TSEP FEIR. Therefore, no further evaluation is required, and no Subsequent EIR is needed pursuant to Public Resources Code Section 21166, and the Project is eligible for the statutory exemption set forth in Government Code Section 65457.

APPENDICES

Appendix A: Air Quality Assessment
Appendix B: Avian Collision Risk Assessment
Appendix C: Phase I Environmental Site Assessment
Appendix D: Phase II Environmental Site Assessment
Appendix E: Interior Noise Assessment