ADDENDUM

to the 2018 Tasman East Specific Plan Final Environmental Impact Report City of Santa Clara

June 2020

1.1 PURPOSE OF ADDENDUM

The California Environmental Quality Act (CEQA) recognizes that between the date an environmental document is certified and the date the project is fully implemented, one or more of the following changes may occur: 1) the project may change; 2) the environmental setting in which the project is located may change; 3) laws, regulations, or policies may change in ways that impact the environment; and/or 4) previously unknown information can arise. Before proceeding with a project, CEQA requires the lead agency to evaluate these changes to determine whether or not they affect the conclusions in the environmental document, consistent with relevant case law.

The EIR for the Tasman East Specific Plan analyzed a change in land use classification from *High Density Residential* to a *Transit Neighborhood* classification for an existing industrial neighborhood, in order to create a Transit-Oriented Development mixed-use neighborhood. The EIR also included analysis of circulation improvements intended to create "complete streets" within the neighborhood. The Plan Area, 46 gross acres in size, is bounded by the City's Santa Clara Golf & Tennis Club to the north, the Guadalupe River to the east, Tasman Drive to the south, and Lafayette Street to the west. The Plan Area includes approximately 36 parcels currently developed with light industrial and commercial uses, including one City-owned utility parcel, and has a total net land acreage of 41.4 acres with approximately 4.6 acres of public right-of-way.

Since the certification of the Tasman East Specific Plan Final EIR in 2018 (TESP EIR), the City is proposing changes to the Specific Plan, which are the subject of this Addendum. The purpose of this Addendum is to address the project's likelihood to result in new significant impacts that were not addressed in the TESP EIR.

The CEQA Guidelines Section 15162 states that when an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more 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 have not been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete 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 measures or alternative.

The CEQA Guidelines Section 15164 states that the lead or responsible agency shall prepare an addendum to a previously certified EIR if changes or additions are necessary but none of the conditions described in Section 15162 (see above) calling for preparation of a subsequent EIR have occurred.

1.2 PROJECT BACKGROUND

General Plan Land Use Classification and Zoning District

The Specific Plan created a framework for the development of a high-density transit-oriented neighborhood with supportive retail services. The zoning of the Plan Area was reclassified from *Light Industrial* to *Transit Neighborhood*, to allow for development of a high-density residential neighborhood with a mix of uses at the ground floor. The previously intended *High Density Residential* land use classification under Phase II (2015-2023) of the General Plan was reclassified as *Transit Neighborhood* to allow for mid- and high-rise mixed-use development in proximity to existing transit infrastructure and increase the density from 37-50 du/ac to 100-350 du/ac. The classification applies only within the Tasman East Specific Plan boundaries (Plan Area).

Development Summary

The Specific Plan allows construction of up to 4,500 dwelling units and up to 106,000 square feet of retail space including a 25,000 square foot grocery store. The Specific Plan allows for a variety of uses including high-rise towers, mixed-use buildings with ground floor retail space, and live-work spaces. Residences would be allowed at minimum densities of 60 dwelling units per acre (du/ac) on sites smaller than one acre, and 100 du/ac on sites that are one acre or larger. The Specific Plan would also allow, upon issuance of a conditional use permit, an urban school for up to 600 students on two acres. The Plan also proposes 10 acres of non-contiguous parkland, open space, paseos, and private open space, as well as a two-acre, 600 student school, upon issuance of a conditional use permit.

Surrounding Development

The Related Santa Clara (formerly CityPlace) mixed-use development project comprises five parcels adjacent to the Plan Area and west adjacent to Lafayette Street. The Related Santa Clara project includes up to 1,680 residential units, 700 hotel rooms, approximately 5.7 million square feet of office space, and approximately 1.1 million square feet of retail, restaurant and entertainment uses. In June 2016, the City certified the Final Environmental Impact Report and Master Community Plan for the Related Santa Clara project. The 240-acre mixed-use development will be developed in phases. Construction of the first phase is anticipated to begin in early 2021 and is anticipated to conclude in 2023. Future phases are expected to be developed over a period of 10-15 years subject to market demand. For the purposes of the TESP EIR, Phases 1-3 of Related Santa Clara were included in the background scenario. As part of the cumulative scenario, full buildout of Related Santa Clara (Phase 1-8) was analyzed in the TESP EIR.

Circulation Improvements

The Specific Plan would maintain the existing roadway network and vehicular connections to Tasman Drive and Lafayette Street. Streets within the Plan Area would be designed as "Complete Streets". As "complete streets", internal roadways would be accessible for, and balance the mobility of, all users, in addition to supporting local land uses. According to the Tasman East Specific Plan, the transportation network should incorporate safe and convenient pedestrian and bicycle connections to existing transit facilities and neighboring trails. In addition to creating complete streets, the primary roadway network modifications in the Specific Plan involve the extension of Lick Mill Boulevard and Calle Del Sol. Lick Mill Boulevard would be extended through the Plan Area to connect with the existing roadway network and Related Santa Clara to the north. Planned improvements to Calle Del Sol consist of widening the right-of-way by six feet and extension of the roadway north from Calle De Luna to Calle Del Mundo. Calle Del Sol north of Calle De Luna would be a local street and include one vehicular travel lane in each direction. The proposed northerly ROW would accommodate a seven-foot sidewalk, five-foot landscape strip, and street parking in both directions.

1.3 DESCRIPTION OF THE PROPOSED PROJECT

Since the certification of the TESP EIR and adoption of the Specific Plan the City has identified minor modifications to the TESP to facilitate pedestrian and bicycle movement through the Plan Area. Additionally, the City is seeking to clarify the EIR traffic analysis of the retail space to identify equivalent co-working and preschool trip generation which are allowed uses in the TESP. Under the revised project, co-working space would also be allowed on the second and third floors of proposed residential buildings.

The northern extension of Calle Del Sol, between Calle De Luna and Calle Del Mundo, will be designed as a pedestrian and bicycle paseo (refer to revised Figures 2.0-3 to 2.0-6). A public easement will be provided through four affected properties to facilitate a privately owned public open space to be developed incrementally in conjunction with the development of each affected property. At the Primavera Pump Station adjacent to Calle De Luna, an additional setback will be required to

allow for continued operation and enclosure of the pump station. The paseo will also serve as an emergency vehicle access (EVA) lane with electronically retractable bollards to allow emergency vehicles and prevent private vehicle access.

1.4 ENVIRONMENTAL IMPACTS OF THE PROPOSED CHANGE

The discussion below describes the environmental impacts of the currently proposed project, as they compare with the impacts of the previously approved project analyzed in the Tasman East Specific Plan EIR (TESP EIR). Also noted are any changes that have occurred in the environmental setting that may result in new impacts or impacts of greater severity than those identified in the previously circulated EIR.

1.4.1.1 Aesthetics

The project is not located within a scenic viewshed or along a scenic highway. The Plan Area is not located within a designated scenic area, based on the Santa Clara General Plan. The Specific Plan area and the surrounding area are relatively flat with the exception of the elevated golf course to the north, and are, therefore, not visible from surrounding areas.

The Specific Plan EIR concluded the buildout of the Specific Plan would not substantially degrade the visual character or quality of the Plan Area or its immediate vicinity, block any designated scenic views or resources, or result in a substantial source of additional light or glare. The changes to the proposed project would not result in any new or more severe impacts than those identified in the EIR, because the only physical changes involve the conversion of the northern extension of Calle del Sol from a two-lane road into a pedestrian and bicycle paseo.

1.4.1.2 *Air Quality*

The Plan Area is located in the San Francisco Bay Area Air Basin. The air basin is considered a nonattainment area for ground-level O₃ and PM_{2.5} under both the federal Clean Air Act and the California Clean Air Act. The area is also considered non-attainment for PM₁₀ under the California Clean Air Act, but not the federal act. The area has attained both state federal ambient air quality standards for CO. Sensitive receptors are located approximately 150 feet south of the Plan Area. The additional kinds of proposed uses for the second and third floors of buildings would not exceed the equivalent amount of allowed retail square footage and, therefore, would not result in new or more severe air quality impacts from operational emissions (refer to Section 1.4.14 Transportation/Traffic). Modification of the roadway network to construct a paseo would encourage non-vehicular travel within the Plan Area and would not result in substantial additional operational emissions. Construction related criteria pollutant, dust, or TAC emissions would be essentially unchanged for redevelopment within the Plan Area. For both operational and construction emissions, mitigation measures identified in the TESP EIR would be implemented and the changes to the proposed project would not result in new or more severe air quality impacts than those identified in the TESP EIR.

1.4.1.3 Biological Resources

The TESP EIR identified biological resource impacts to western pond turtles, burrowing owls, migrant birds, nesting birds, wetlands, riparian woodland, riparian buffer, other sensitive habitats,

mature trees, and bird species generally due to increased lighting and predation. Properties located adjacent to the Guadalupe River were generally more likely to have impacts to these biological resources. The proposed roadway network modifications are not located near sensitive habitats and, as with any redevelopment in the Plan Area, would be subject to the mitigation measures identified in the TESP EIR. The proposed changes to the Specific Plan would not result in new or more substantial biological resources impacts than those identified in the TESP EIR, because the changes to the Specific Plan do not involve changes to the overall height or intensity of the project, and do not include additional lighting near riparian areas.

1.4.1.4 *Cultural Resources*

The TESP EIR concluded the Plan Area does not contain known archaeological resources, but due to the presence of adjacent archaeological resources, has a moderate-to-high potential to contain prehistoric cultural resources.

SB 18 (2005) requires local governments to consult with tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process, including amendments to General Plans and Specific Plans. Consistent with this mandate, the City contacted local Native American tribes for consultation on this Specific Plan amendment regarding any tribal cultural resources known to be present in the Plan Area. None of the local tribes have responded to notification of the proposed Specific Plan. There are also no known tribal cultural resources within the Plan Area.

Based on the presence of Pleistocene sediments underlying the Plan Area at depths of 25 feet below ground surface (bgs), there is a high potential for subsurface paleontological resources within the site. The Plan Area does not contain any historic buildings. There is a low potential for historic-era archaeological resources to occur within the Plan Area.

The proposed changes to the Specific Plan, which include the conversion of the proposed Calle del Sol roadway extension to a pedestrian paseo, would not result in new or more severe impacts to cultural resources than those identified in the TESP EIR.

1.4.1.5 *Energy*

Modification of the roadway network to construct a paseo would encourage non-vehicular travel within the Plan Area and would not result in substantial additional fuel use. The additional kinds of proposed uses for the second and third floors of buildings, including co-working and daycare, would not exceed the equivalent amount of allowed retail square footage for the Plan Area and, therefore, would not result in increased energy use from implementation of the TESP (refer to Section 1.4.14 Transportation/Traffic). Co-working and daycare use would adhere to all applicable policies for building energy efficiency and, therefore, are assumed to operate with comparable energy demands to the previously analyzed retail use. For these reasons, consistent with implementation of energy efficiency measures, the updated Specific Plan would not result in new or more severe energy impacts than those identified in the TESP EIR.

1.4.1.6 Geology and Soils

The TESP EIR concluded the Specific Plan, in conformance with existing regulations, would not result in significant geologic and soils impacts. The proposed changes to the Specific Plan would not result in new or more severe geology and soils impacts than those identified in the TESP EIR.

1.4.1.7 Greenhouse Gas Emissions

The TESP EIR concluded the Specific Plan would be consistent with the City's Climate Action Plan and would not result in greenhouse gas (GHG) emissions exceeding efficiency metrics required to reach state mandated emission reductions in 2030.

The changes to the Specific Plan relevant to the greenhouse gas emissions of the project are the altered circulation network resulting from construction of the Calle Del Sol extension as a pedestrian and bicycle paseo. The use of the planned retail square footage for co-working and daycare uses would not substantially increase greenhouse gas emissions because they would not exceed the equivalent trip generation resulting from the planned retail space. The extension of Calle Del Sol as a paseo would also encourage non-vehicular travel in the Plan Area. The proposed changes to the Specific Plan, with previously identified Climate Action Plan consistency measures, would not result in new or more severe GHG impacts than those identified in the TESP EIR.

1.4.1.8 Hazards and Hazardous Materials

The 46-acre Plan Area was utilized for agriculture between the 1930s and 1970s. Between the 1970s and the present, the site has been developed with industrial uses. The project site contains hazardous materials both for ongoing industrial processes and as residual contamination from past use.

The TESP EIR concluded that the proposed Specific Plan would ensure contaminated sites are remediated such that redevelopment of the Plan Area would result in a less than significant hazardous materials impact. The proposed Specific Plan was determined to not result in other significant hazards, including wildfire hazards. The proposed changes to the Specific Plan would not result in new or more severe hazard or hazardous material impacts than those identified in the TESP EIR.

1.4.1.9 *Hydrology and Water Quality*

The TESP EIR concluded that implementation of the proposed Specific Plan, in conformance with existing regulations and mitigation measures implemented in the northwest corner of the Plan Area to address flooding, would result in less than significant hydrology impacts. The proposed changes to the Specific Plan would not modify anticipated fill levels or the planned storm drainage system. The proposed changes to the Specific Plan, therefore, would not result in new or more severe impacts to hydrology or water quality than those identified in the TESP EIR.

1.4.1.10Land Use and Planning

The TESP EIR found implementation of the Specific Plan would not create new land use compatibility impacts due to substantially increasing residential development in this area of Santa Clara. Development of the Plan Area would conform to the *Transit Neighborhood* land use

classification adopted by the City. The proposed changes to the Specific Plan would not result in new or more severe land use or planning impacts than those identified in the TESP EIR.

1.4.1.11 Noise and Vibration

Construction related noise and vibration impacts of the Specific Plan were identified in the TESP EIR and would be reduced to less than significant levels with implementation of mitigation measures. The proposed changes to the Specific Plan roadway network would not result in new or more significant noise and vibration impacts than those identified in the TESP EIR.

1.4.1.12 Public Services

The TESP EIR concluded the Specific Plan, as analyzed, would result in less than significant impacts to public services. The proposed modifications to the planned roadway network would continue to allow adequate emergency vehicle access to all development within the Plan Area and would not result in new or more severe public service impacts than those identified in the TESP EIR.

1.4.1.13 Recreation

The Plan Area is currently not served by neighborhood parkland within a 10-minute walk from the site. The 2018 EIR concluded that the provision of on-site park and recreational space, and payment of parkland dedication fees would ensure impacts to recreational facilities would be less than significant. The proposed changes to the Specific Plan roadway network would provide additional connectivity for pedestrians and bicycles to planned park uses and would not result in new or more severe impacts to parkland or recreational facilities than those identified the TESP EIR.

1.4.1.14 Transportation/Traffic

The TESP EIR analyzed transportation and traffic impacts of the proposed project in accordance with the VTA's Congestion Management Program (CMP) guidelines, due to the project's estimated generation of greater than 100 peak hour trips. The Traffic Impact Analysis (TIA) was included in Appendix G of the TESP EIR and analyzed 4,500 residential units, 106,000 square feet of retail space, and a 600-student school. Co-working space and daycare uses are allowed uses under the Specific Plan that may be incorporated in proposed development in the Plan Area. The equivalent retail and school trip generation resulting from co-working space and daycare uses is provided in a trip generation memo prepared by Fehr & Peers in Attachment 1. Based upon the trip generation rates included in Attachment 1 and described above, future development within the Plan Area that proposes co-working and daycare uses would not significantly exceed the retail square footage and student assumptions analyzed in the TESP EIR.

Although VMT is currently the adopted metric for analyzing traffic impacts under CEQA, the City did not have an adopted VMT policy at the time of the adoption of the Specific Plan. The proposed changes to the planned circulation network are part of an existing approval and per the City's recently-adopted VMT Policy, do not require further environmental review. The TESP EIR analyzed traffic conditions using level of service (LOS) consistent with the City's then-current LOS standards. The TESP EIR concluded the project as proposed would result in significant unavoidable or cumulatively considerable impacts to traffic and transportation at 15 study intersections. The trip

generation memo analyzes the proposed changes to the Specific Plan in light of the conclusions reached and mitigation measures proposed in the adopted EIR.

The proposed change relevant to transportation or traffic impacts is the Calle Del Sol extension being converted from a "local street" to a pedestrian paseo. The TESP EIR analyzed the Calle Del Sol extension as a vehicle-accessible "local street", which would feature up to three vehicular travel lanes, be generally designed to calm traffic, and would be pedestrian focused. Under the newly proposed circulation plan for the Plan Area, the northern extension of Calle Del Sol would be closed to private vehicle use and would serve as a pedestrian paseo with designated pathways for bicycles and pedestrians.

The Traffic Impact Analysis, Appendix G of the TESP EIR, included an Internal Streets Sensitivity Analysis (TIA Appendix I) that analyzed various roadway network alternatives and their effects on intersection LOS. Development of the Plan Area without the Calle Del Sol extension was analyzed and found a limited increase in traffic at the Lafayette Street and Lick Mill Boulevard intersections, due to vehicles being diverted east- and westbound rather than northbound. The analysis concluded, however, any increased traffic would not measurably increase unacceptable LOS at Plan Area intersections.¹ In addition, under the Specific Plan, any northern Calle Del Sol extension was anticipated to be completed as part of Phase Two construction, in order to serve development in the Plan's Center District. For this reason, vehicular access to the northern Calle Del Sol extension is not critical to overall circulation within the Plan Area. Given the emphasis of the previous "local street" designation on pedestrian use, inclusion of a fully pedestrian serving paseo is not a significant deviation from the objectives of the original plan. Considering the pedestrian focus of the original "local street" designation, the secondary importance of the Calle Del Sol extension to the overall development of the Plan Area, and the less than significant traffic impact of a "no extension" alternative, conversion from a pedestrian focused roadway to paseo would not cause a new or more significant traffic impact than those identified in the TESP EIR.

1.4.1.15 Utilities and Service Systems

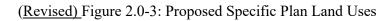
The TESP EIR concluded the proposed specific plan would require upsizing of a water main in Lafayette Street that would be subject to mitigation measures related to ground-disturbing activities. A new stormwater catch basin within the Plan Area would have similar impacts due to ground disturbing activities and would also be subject to mitigation measures. The proposed Specific Plan would not result in significant impacts to water supply, sewage treatment or conveyance facilities, and solid waste facility capacity. As part of the proposed changes to the Plan Area circulation improvements, construction of the Calle Del Sol extension as a paseo would allow the retention of the Primavera sewer pump station in its current location on-site, and avoid impacts arising from the relocation or undergrounding of the station. Therefore, the proposed changes to the Specific Plan would not result in new or more severe impacts to utilities or service systems than those identified in the TESP EIR.

1.5 CONCLUSION

¹ Fehr & Peers. Traffic Impact Analysis for the Tasman East Specific Plan area: Appendix I. Internal Streets Sensitivity Analysis. June 2018.

Based on the above analysis, no significant impacts would result from the proposed changes to the Tasman East Specific Plan. The proposed roadway network modifications would not result in new significant environmental 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 TESP EIR; therefore, no further evaluation or Subsequent EIR is required. An EIR Addendum has therefore been appropriately prepared, pursuant to Section 15164.

Pursuant to CEQA Guidelines Section 15164(c), this Addendum need not be circulated for public review, but will be included in the public record file for the Tasman East Specific Plan.







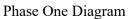
(Revised) Figure 2.0-4: Proposed Circulation Network

(Revised) Figure 2.0-5: Planned Open Space Network



(Revised) Figure 2.0-6: Potential Specific Plan Phasing







Phase Two Diagram

Attachment 1: Fehr & Peers Memo

Fehr & Peers

Memorandum

Subject:	Land Use Equivalencies for Proposed Tasman East Specific Plan Revisions		
From:	Matt Haynes, Fehr & Peers		
То:	Dennis Dornan, Perkins + Will Will Burns, David J. Powers & Associates, Inc.		
Date:	June 11, 2020		

SJ16-1669.03

Fehr & Peers conducted a trip generation equivalency analysis for a proposed change to the Tasman East Specific Plan (TESP) in Santa Clara, California. The TESP, as originally evaluated, included 4,500 residential units, 106,000 square feet of retail space (including a 25,000 square foot grocery store), and a 600 student school. Currently proposed uses include co-working and day care space, which do not fit into any of these land use categories. The purpose of this analysis is to determine the retail and school land use equivalencies for the proposed co-working and day care uses, based on expected vehicle trip generation rates.

Analysis Approach

Daily, AM peak hour, and PM peak hour vehicle trip generation estimates were developed for the proposed co-working and day care uses using rates from the Institute of Transportation Engineers (ITE), *Trip Generation Manual*, 10th Edition. Co-working space is not specifically identified in the *Trip Generation Manual*, so general office trip generation rates are used.

The co-working vehicle trip rates were then divided by trip generation rates for shopping center (to represent retail space) from the *Trip Generation Manual* to obtain equivalent square feet (sf) of retail space.

Additionally, day care vehicle trip generation rates were divided by the rates for schools used in the TESP to obtain an equivalent student conversion rate.

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Analysis Results

The trip generation rates for the co-working and day care uses are presented in **Table 1**. Rates are shown per thousand square feet of floor area for co-working space and per student for day care space.

Table 1: Vehicle Trip Generation Rates for Proposed Co-Working and Day CareUses

Use	Daily	AM Peak Hour	PM Peak Hour
Co-Working (per thousand square feet)	9.74	1.16	1.15
Day Care (per student)	4.09	0.78	0.79

Source: Institute of Transportation Engineers, *Trip Generation Manual*, 10th Edition, September 2017.

Retail trip rates were divided by the trip rates above to estimate equivalent amounts of retail space. The results are presented in **Table 2**. There is a range of equivalencies depending on whether daily, AM peak hour, or PM peak hour trips are used as the basis. The conversion rate to retail space therefore ranges from 0.81 to 3.88 for every 1,000 square feet of retail space.

Table 2: Retail Vehicle Trip Generation Rates and Conversions

Land Use	Daily	AM Peak Hour	PM Peak Hour			
Trip Generation Rates						
Retail	37.75	0.94	3.81			
Equivalent Conversion Rate (per 1,000 of square feet of retail space)						
Retail to Co-Working	3.88	0.81	3.31			

Source: Institute of Transportation Engineers, *Trip Generation Manual*, 10th Edition, September 2017.

School trip rates were divided by the trip rates above to estimate an equivalent student conversion rate. The results are presented in **Table 3**. The student conversion rate ranges from 0.39 to 1.27 for every student depending on whether daily, AM peak hour, or PM peak hour trips are used.



Land Use	Daily	AM Peak Hour	PM Peak Hour		
Trip Generation Rates					
School ¹	1.61	0.99	0.62		
Equivalent Conversion Rate (per student)					
School to Day Care	0.39	1.27	0.78		

Table 3: School Vehicle Trip Generation Rates and Conversions

Source: Institute of Transportation Engineers, *Trip Generation Manual*, 10th Edition, September 2017; Tasman East Specific Plan *Trip Generation Estimates Memorandum*, November 2017

Notes: ¹ Rates used in the Tasman East Specific Plan are based only on the total number of students assumed to arrive by car. Of the total school size of 600 students, about 390 students (65%) are assumed to arrive via car. The remaining students would arrive on foot or by bike.

Conclusions

Based on the results shown in **Table 2**, the AM peak hour would yield the lowest trip conversion rate. Using the lowest conversion rate values to be conservative, one could construct 810 square feet of co-working space for every 1,000 square feet of retail space.

In addition, based on **Table 3** results, the daily rate would yield the lowest trip conversion rate for school trips. One could therefore allow 0.39 day care students for every general school student.