COUNCIL AGENDA: 08/09/22

FILE: 22-1146 ITEM: 10.4



# Memorandum

**TO:** HONORABLE MAYOR AND CITY COUNCIL

**FROM:** Planning Commission

SUBJECT: SEE BELOW DATE: July 19, 2022

**COUNCIL DISTRICT: 9** 

SUBJECT: FILE NOS. CAMBRIAN NO. 37 & PDC17-040. ANNEXATION OF TWO UNINCORPORATED PARCELS AND PORTIONS OF CAMDEN AVENUE AND UNION AVENUE TOTALING APPROXIMATELY 19.92 ACRES FROM THE COUNTY OF SANTA CLARA INTO THE CITY OF SAN JOSÉ. PLANNED DEVELOPMENT PREZONING TO CHANGE THE ZONING TO CP(PD) PLANNED DEVELOPMENT ZONING DISTRICT TO ALLOW A MIXED-USE PROJECT WITH UP TO 428 DWELLING UNITS, AND UP TO 350,000 SQUARE FEET OF COMMERCIAL SPACE, INCLUDING A HOTEL, ASSISTED LIVING, AND GROUND-FLOOR RETAIL, WITH A MINIMUM OF 4.0 ACRES OF PRIVATELY OWNED PUBLICLY-ACCESSIBLE OPEN SPACE (POPOS) AND ASSOCIATED PARKING, LANDSCAPING, AND SITE AMENITIES, LOCATED ON THE SOUTHEAST CORNER OF UNION AVE AND CAMDEN AVE (14200 UNION AVENUE).

# **RECOMMENDATION**

The Planning Commission voted 8-0-1 (Young absent) to recommend that the City Council take all of the following actions:

- 1. Adopt a Resolution certifying the Environmental Impact Report (EIR) for the Cambrian Park Mixed-Use Village Project (SCH #2018022034), and make certain findings concerning mitigation measures and alternatives, and adopting a mitigation monitoring and reporting program, all in accordance with the California Environmental Quality Act (CEQA), as amended.
- 2. Approve an ordinance pre-zoning an approximately 18.13-gross acre site in Santa Clara County unincorporated territory designated as Cambrian No. 37 into the CP(PD) Planned Development Zoning District, including clarifications to the draft Development Standards attached to this memorandum.
- 3. Adopt a resolution initiating proceedings and scheduling September 13, 2022, for City Council consideration of the reorganization of territory designated as Cambrian No. 37, which involves the annexation to the City of San José of approximately 19.92-gross acres of land from Santa Clara County unincorporated territory and the detachment of the same

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from the appropriate special districts.

# **OUTCOME**

If the City Council approves all the actions listed above as recommended by the Planning Commission, the City will be able to continue the process to annex two unincorporated parcels and portions of Camden Avenue and Union Avenue totaling 19.92 acres from the County of Santa Clara into the City of San José and the 18.13-gross acre site will be pre-zoned into the CP(PD) Planned Development Zoning District to allow a mixed-use project with up to 428 dwelling units, and up to 350,000 square feet of commercial space, including a hotel, assisted living, and ground-floor retail, with a minimum of 4.0 acres of privately owned publicly-accessible open space (POPOS) and associated parking, landscaping, and site amenities, located on the southeast corner of Union Ave and Camden Ave (14200 Union Avenue). The zoning of the site will not take effect until certification of the annexation by the Local Agency Formation Commission (LAFCO).

# **BACKGROUND**

On July 13, 2022, the Planning Commission held a Public Hearing to consider the Environmental Impact Report (EIR), Annexation, and Pre-Zoning. The Planning Commission recommended that the City Council adopt the resolution certifying the Environmental Impact Report (EIR) for the Cambrian Park Mixed-Use Village Project and related Mitigation Monitoring and Reporting Plan and approve the subject Annexation and Pre-Zoning.

#### Staff Presentation

Laura Meiners, Planning Project Manager, provided a brief oral presentation of the proposed project. Staff presentation included an overview of the project's conformance with the General Plan, Signature Project Criteria, San José Municipal Zoning Code, and City Council Policy 6-30: Public Outreach. Kara Hawkins, Environmental Planning Project Manager, provided a brief oral presentation regarding the environmental review process and project conformance with the California Environmental Quality Act (CEQA).

# Applicant Presentation

The applicant's representatives, Sean Morley and Ken Rodriguez, provided a presentation covering the details of the project, including a brief history of the site, design goals, conceptual site layout, and project design, underground parking, public open space, and public improvements. The applicants also stated that there are 600 residents who have registered support of the project on the project's website.

#### Public Hearing

Chair Oliverio opened the public comment portion of the agenda.

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Twenty-seven members of the public spoke on the proposed project. Of the 27 public speakers, seven spoke in opposition to the project, and twenty spoke in support of the project. The comments of the speakers are summarized below:

- Doug Chesshire, a labor union representative for Carpenter's Local 405 in San José, stated that he has engaged with the applicant and is in support of the project. He said the project has the potential to put a lot of local professionals to work during the build-out and would also provide a pathway into the construction industry through apprenticeships.
- Three members of the Silicon Valley Residents for Responsible Development, including Tara Rengifo, Will Smith, and Antonio Rodriguez, stated that the Commission cannot recommend approval until the project fully complies with CEQA and meets the Signature Project requirements. They said the group prepared comments on the draft EIR with the assistance of three experts and concluded that the project would have significant impacts on air quality and public health, greenhouse gas emissions, noise, and transportation that were not adequately disclosed or mitigated in the draft EIR. They said the City also failed to analyze the energy and water supply impacts, and the City must revise and recirculate the EIR. Additionally, they said the project does not comply with the Signature Project Policy requirements, since the project falls short of the job growth needed to qualify for a Signature Project
- Lalo Mendez with Catalyze SV said she liked the community engagement but would like more on-site affordable units and an increase in the affordability from 100% AMI to 60% AMI.
- Gregg Bunker said he was a 50-year resident and commercial property owner who is in support of the project. He said the project is very exciting and will increase residential and commercial property values, and that it is a good-looking project.
- Mark Chiu, a community resident, said that he attended the November 2020 outreach
  meeting, and brought up the issue that there are only two crosswalks at the intersection of
  Charmeran Avenue and Union Avenue. He said although he realizes that this intersection
  is within the County's jurisdiction, he didn't feel he received a response about when this
  issue would be addressed.
- Alex Melendrez, organizing manager for South Bay YIMBY, stated he is in strong support of the project because San José needs the housing options this project would provide.
- Evelin Meza with Bay Area Council stated that the City has an underproduction of
  housing and this project is an opportunity to add much-needed housing and public open
  spaces to the community. She said due to the COVID crisis, the new normal includes a
  lot more people working from home, and it is critical that adaptation to this new normal
  begins immediately.
- Ali Sapirman with the Housing Action Coalition said she was in strong support of the
  project. She said housing advocates believe the project has excellent land use with a mix
  of housing, commercial, and parklands. She said she is eager to see the impact of the
  project on the community.

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• Rebecca Haggerty, a community resident, said she is in favor of the project. She stated the existing shopping center is old and run down and she is looking forward to something new there and is excited about the open space and playgrounds.

- Carl Norum stated he is in support of the project because it is a better use of space than the existing shopping center, and the design presented is exceptional.
- Jeffrey Hertman said he came to San José in 2017 but has been priced out of several
  apartments and some friends have had to move out of the area. He said he is concerned
  about also being priced out and forced to move to another city. He expressed support for
  this project to help bring more homes to the area with more public space, transit options,
  and more jobs.
- Vince Rocha, Vice President of Housing and Community Development with the Silicon Valley Leadership Group, said the project will not only provide much-needed housing, including rental, ownership, and assisted living options, but will also contribute to the City's tax base with the new hotel and the commercial space. He said the project is consistent with the General Plan goals of the City, including the Signature Project requirements.
- Alex Dersh, a resident of Willow Glen, said he was skeptical that he can live in San José
  in the future due to rising housing costs but supports this project since it will bring
  housing options to the area. He commented positively on the plaza shopping area.
- Ryan Globus, a resident of San José, said he supported the project since there is a current housing shortage, and that the lack of affordability is pushing community members, including friends and family, out of the area.
- Jordan Grimes with the Greenbelt Alliance expressed strong support for the project and
  that he sees the project as a significant opportunity to convert the existing sea of surface
  parking into badly needed homes and green spaces, and commercial space that will
  provide a vibrant mixed-use center that will benefit the entire community. He said adding
  homes near jobs reduces VMT and greenhouse gas emissions and will help to address the
  climate crisis.
- Adam Sweeney, a homeowner in San José for the last 18 years, expressed support for the high density of the project since Union and Camden are major thoroughfares. He said this beautiful mixed-use project has taken too long to get started.
- Alex Shoor with Catalyze SV expressed support for the project but would like to see an increased provision for units for lower income levels. He stated Catalyze SV scored the project a 5 out of 5 for their criteria.
- Annie Wang, a community resident, said she drives by the shopping center regularly. She
  expressed support for the project because the existing space has been underutilized for
  many years. She expressed disappointment that it has taken this long to move the project
  forward.
- Maurya is a Cambrian resident and said she does not support the project because there
  will be a negative effect on the area and the neighborhood, including traffic and
  congestion. She stated that the density of the project is too high, and the project doesn't
  need the density, it just needs a makeover of the existing shopping center.

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- Sara Day, a Cambrian resident, expressed support for the project. She said she is looking forward to seeing the space redeveloped. She said she drives by the existing shopping center often and would love to see the project as a destination instead of a parking lot.
- Elizabeth Conlan said she is a San José resident and a renter, and a member of the South Bay YIMBY. She expressed support for the project. She said she moved here with her partner and his elderly mother, and it was a challenge to find ADA-compliant housing, and that this new development will include ADA-compliant units and will be a benefit to those people in similar situations.
- Ken Koen, a community resident, expressed concern about the two nearby Robson Homes projects. He said the homes on those projects would cost approximately two million dollars and would not be affordable. He said he was concerned that this project will also not be affordable.
- Gabriel (no last name given) said she was a long-time resident of San José and an advocate for affordable housing and sustainable design and said she supported the project. She said the project includes community impact and is not the typical 10-story development in the middle of existing single-family homes. She said this is truly an urban village with a good mix of residential with a gradual progression of height, and that we needed this project "built yesterday."
- Colette and Dave Stratman, community residents, expressed support of the project, have been waiting for the project for years, and are excited and hopeful about the project, especially the walkability and open spaces.
- Peter Clarke, a representative on behalf of the Friends of Cambrian Park Plaza, said the group has engaged productively with the applicant for over two years. He said they are looking for a win for everyone including the community. He said the group has 1,500 resident members, and they have reviewed and commented on the EIR. He said the community still has concerns about traffic, lack of parking and transit, and the high density, and although there are some affordable units, most are still market rate. He said all those people will own cars, will not work in the Urban Village and they will commute, which will stress the local infrastructure. He said the community believes that the traffic analysis in the EIR is inadequate, and there is no account of Los Gato's developments, which is about a mile and a half away.

After the public comment, the applicant's representatives, Sean Morley and Ken Rodrigues continued with their slide presentation, including conceptual renderings of the mixed-use plaza area, the single-family residential use, the hotel, and the townhomes with an adjacent park where the historic carousel sign will be relocated. Surrounding the site, both along Camden and Union, will be a dedicated raised and protected bike lane. The applicants continued by addressing and confirming the thorough and complete project review and EIR process. The project includes vertical mixed-use with four acres of public open space. The applicants reached out and addressed a lot of the community concerns during the process. They also noted that the renderings are exactly the same as the Planned Development Permit that will be heard at a later date.

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Laura Meiners reiterated to the Commission that the hearing is to recommend approval or denial of the annexation and the pre-zoning to the City Council and does not include a recommendation regarding the Planned Development Permit. As to the project's conformance with the Signature Project Policy requirements, the City allocates job growth for each urban village based on an assumption of one job per 300 square feet of commercial space, consistent with the evaluation of how we calculate jobs for Urban Villages and other Signature Projects. The project provides 349,310 square feet of commercial use when they are required to provide 272,565 square feet of commercial and therefore meet the requirements of the Signature Project Policy. The EIR also assumes one worker per 300 square feet of commercial use as analyzed on page 112 of the EIR.

Principal Planner David Keyon responded that the EIR analysis is consistent with all other development projects that the City analyzes, including consistent approaches to evaluating construction air quality impacts, construction noise impacts, and vehicle miles traveled (VMT) impacts pursuant to City Council Policy 5-1, which is the current City Development Policy for Transportation Analysis. This is consistent with how we analyze all other infill development projects in the City, and there are no unique issues with this project that would raise new significant and unavoidable impacts, therefore staff stands by the analysis that is presented in the EIR.

#### Commissioner Discussion

Chair Oliverio asked about the density of the project, specifically why it was so much less than the recently approved El Paseo de Saratoga project. Laura Meiners replied that although the General Plan requires a minimum of 55 dwelling units per acre (du/ac) in areas within Urban Villages, it also allows for lower density adjacent to single-family homes, and the City and the applicant wanted to be sensitive to the community in that regard. This project has 39 du/ac.

Commissioner Lardinois had some process questions about the steps the project has to take to get the site annexed and the project approved, referencing Laura Meiners' comment above that the subject hearing is for recommendation to City Council for the annexation and the pre-zoning. Specifically, when the Planned Development Permit comes to hearing, will it come to the Planning Commission. Laura Meiners replied that as of now, the process is that it will be heard at Director's Hearing. There may be a process to get it heard at City Council, and we're looking into that, but it will not come to the Planning Commission unless it does go to Director's Hearing and gets appealed. The next hearing will be to the City Council for the initiation of the annexation, then it will be heard by City Council again to order the annexation, then LAFCO certifies the annexation, and the hearing for the Planned Development Permit will be hearing #4. The commissioner then commented that this was the first time an annexation had been heard by the Planning Commission since he's been on the Commission. He asked staff to confirm that a pre-zoning is assigning a zone to a parcel that has not yet been annexed into the City. Laura Meiners confirmed the correctness of the statement. Robert Manford, Deputy Director, clarified that the City legally cannot approve a development that is not within the City's jurisdiction, so we have to proceed with the annexation and pre-zoning first. The commissioner followed up with a question about if the land gets annexed, would it be possible for the development to be denied at a future hearing. Laura Meiners confirmed that that scenario is a possibility.

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Commissioner Ornelas-Wise believes it's about time for the City to annex this parcel and redevelop it. She's in support of the annexation. As a mom walking to the park with two kids and a stroller, Camden and Union Avenues are large throughways. She would like to see off-site improvements to the streets to improve pedestrian safety, public art, and signage for parking and access to the park. Approving projects this size can create a lot of jobs and improve the quality of life for its residents.

Commissioner Barocio asked about when there's an EIR, what is the next step if the public still doesn't feel that it is sufficient. It's clear that staff addressed the public comments in a timely manner as to the project impacts, but if there are still concerns, what recourse does the public have. Robert Manford confirmed that staff prepared an EIR, which is the most detailed and thorough documentation to analyze CEQA impacts. Staff has prepared the EIR in a way that is consistent with other similar projects, and staff has responded to all public comments. Anyone can challenge an EIR and say that it is not adequate, but staff will determine whether there is substantial evidence to require recirculation of an EIR, and at this point, there isn't any such evidence. Johnny Phan from the City Attorney's Office also responded that as far as process, the Planning Commission is making a recommendation on the EIR to the City Council. The City Council will then make a decision on the EIR. Once they make that decision, that decision from the City Council is final. If any member of the public is unhappy with the mitigation or analysis in the EIR, the next step would be for them to file a lawsuit against the City challenging the EIR. Also, Johnny Phan clarified for the record that although there has been some discussion that there is not a project before the Planning Commission, that's not correct. There is a project before the Planning Commission, including an EIR and a pre-zoning. In the pre-zoning, it's not just a change of color on the map, there's a specific project. You have a plan set that is Exhibit J and Development Standards which sets out the uses, the minimum amount of commercial required, and maximum height, for example. The Planned Development Permit, which is the design of the project, will be heard later. But there is a project before you, and the EIR analyzed the project. Chair Oliverio further added that there are a lot of projects with CEQA analysis that come before the Planning Commission, and there is always the potential for there to be someone who disagrees with it, and you have to ascertain if the public concern is greater than the expertise of staff.

Commissioner Cantrell had a question about the total number and percentage of affordable housing. Applicant representative Sean Morley responded that per the City's Inclusionary Housing Ordinance, applicants must provide either 15% of the housing units as affordable onsite or pay an in-lieu housing fee that is separate from the Commercial Linkage Fee. The ordinance does allow for hybrid compliance, which means the applicant can provide on-site units as well as in-lieu housing fees in combination. The current Housing Compliance Plan filed with the Housing Department two weeks ago has three components. The first is on-site affordable housing, which we are providing in the mixed-use building on the corner. That building has 305 apartments, and the applicant is proposing 30 of the units as affordable on-site, deed-restricted units. The applicant will also be paying significant fees which total approximately nine million dollars to the affordable housing in-lieu funds, which the City can use to support approximately 70 additional units within the City. The applicants are also including 27 accessory dwelling units (ADUs), which while they are not deed-restricted, are incorporated within the single-family homes and can be rented out. These ADUs are affordable by design.

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Commissioner Barocio asked if it was up to the discretion of the applicant or the City what percentage of AMI they will provide. Sean Morley responded that the Inclusionary Housing Ordinance offers options, and there are different fee structures for each of the AMI percentages available. The project has included affordable units at the 100% AMI level, given the basic feasibility issues of the project. As a result of community input, the project has reduced the height, reduced the number of units, and tried to find other ways to provide affordability, which is difficult when you're providing almost 25% of the site to open space and underground parking. On a per unit basis, the cost of this project is exceedingly expensive due to the significant community amenities provided. The commissioner also asked regarding transportation and transit improvements, is there a certain threshold as far as the number of units or number of anticipated residents that triggers coordination with the VTA for improved or more frequent transit. Laura Meiners replied that as part of the development project, the applicant will be conditioned to coordinate with the VTA to improve the bus stops along Union and Camden Avenues, and called on Florin Lapustea with the Department of Transpiration to clarify any additional measures. Florin Lapustea confirmed that coordination with VTA for improvements to the existing bus stops has been ongoing, and there is the potential for a new bus stop a few blocks down from the project site to be installed. A previous project, the Harker School, provided contributions toward that stop. Chair Oliverio clarified that while the City can condition certain infrastructure improvements, the City has no control over the VTA and the frequency of the bus routes.

Commissioner Ornelas-Wise mentioned that she is thinking of the relocation of the existing business owners and wanted to ensure that City staff and the developer work in good faith with the small business owners for the proper resources for the relocation of their businesses.

Commissioner Lardinois sees the project overall as a valuable addition to the Cambrian area. There's not really anything in that part of town that's a people-oriented gathering place like this project would be. He also sees similarities between this project and the El Paseo de Saratoga project, in that both were auto-oriented shopping centers that were built in a different time and served the needs of those times but have outgrown that use. He sees the project as an exciting reuse and adaptation of the land. As to the annexation of the property, this does allow the land to be brought into the City of San José to have access to public services in a way that has not been possible before. We have a lot of County pockets within San José's borders, and this annexation is a small improvement toward addressing that problem. He made a motion to approve the staff recommendation.

Commissioner Casey seconded the motion and stated that he was excited to see this project come to fruition.

Chair Oliverio stated that he's personally attended four Community Meetings on this project throughout the years, and the General Plan states that parcels such as this are prime opportunities for redevelopment. This one's been in the queue a long time, and the State of California is changing legislation to promote this type of housing, and if this was an applicant today, the process would have gone much faster based on the new State Law. As it stands, this project is dealing with legacy requirements.

The motion to recommend Council approval of the project was approved (8-0-1). Commissioner

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Young was absent.

# **ANALYSIS**

Analysis of the proposed CEQA clearance, Annexation, and Pre-Zoning, including conformance with the General Plan, Zoning Ordinance, Design Guidelines, and City Council Policies is contained in the attached staff report.

# **CONCLUSION**

In summary, the project was heard at the July 13, 2022 Planning Commission Meeting. The motion to recommend Council approval of the project passed (8-0-1). Commissioner Young was absent. As discussed in the attached staff report, the project is consistent with the Envision San José 2040 General Plan, the Zoning Code, the Commercial, Residential, and Single-Family Design Guidelines, and City Council policies for public outreach, and the requirements of CEQA. Should the City Council adopt the resolution certifying the Environmental Impact Report, and approve the Annexation and Pre-Zoning, the City will be able to continue the process to annex two unincorporated parcels and portions of Camden Avenue and Union Avenue totaling 19.92 acres from the County of Santa Clara into the City of San José and the 18.13-gross acre site will be pre-zoned into the CP(PD) Planned Development Zoning District to allow a mixed-use project with up to 428 dwelling units, and up to 350,000 square feet of commercial space, including a hotel, assisted living, and ground-floor retail, with a minimum of 4.0 acres of privately owned publicly-accessible open space (POPOS) and associated parking, landscaping, and site amenities, located on the southeast corner of Union Ave and Camden Ave (14200 Union Avenue). The zoning of the site will not take effect until certification of the annexation by LAFCO.

# **EVALUATION AND FOLLOW-UP**

Should the City Council adopt the resolution certifying the EIR, and approve the Annexation and the Pre-Zoning, the City will be able to continue the process to annex two unincorporated parcels and portions of Camden Avenue and Union Avenue totaling 19.92 acres from the County of Santa Clara into the City of San José and the 18.13-gross acre site will be pre-zoned into the CP(PD) Planned Development Zoning District to allow a mixed-use project with up to 428 dwelling units, and up to 350,000 square feet of commercial space, including a hotel, assisted living, and ground-floor retail, with a minimum of 4.0 acres of privately owned publicly-accessible open space (POPOS) and associated parking, landscaping, and site amenities, located on the southeast corner of Union Avenue and Camden Avenue (14200 Union Avenue). The zoning of the site will not take effect until certification of the annexation by LAFCO.

# **PUBLIC OUTREACH**

Staff followed Council Policy 6-30: Public Outreach Policy in order to inform the public of the

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project. On-site signs were posted on the project frontages on October 20, 2017. An updated on-site sign with information regarding the Planned Development Permit and Vesting Tentative Map has been posted on the site since March 2, 2021. Public Notices of the community meeting and public hearing were distributed to the owners and tenants of all properties located within 1,000 feet of the project site and posted on the City website. The staff report is also posted on the City's website. Staff has been available to respond to questions from the public.

The project held two Joint Environmental Scoping and Community Meetings for the project and multiple meetings hosted by City of San José Council District 9 staff. The first Joint Community Meeting was held on March 5, 2018, in person, and the second meeting was held on November 5, 2020, via Zoom. There were approximately 244 members of the public in attendance at the 2018 meeting and approximately 132 members in attendance at the 2020 meeting.

During the March 5, 2018 meeting, there were concerns about height, density, traffic, parking, and public transit, among other issues discussed in the Public Outreach section below. The project height in the first draft of the project was up to seven stories, and based on community input, the applicant reduced the project height to a maximum of six stories.

The version of the plans shown at the March 5, 2018 meeting also had townhomes along the rear property line and a park area that was only one acre in size. With the revised Site Plan submitted in 2020, the proposed project layout was changed to include single-family homes adjacent to the existing homes to the rear of the project site along Bercaw Lane and four acres of park and plaza area. Some of the single-family homes proposed along this property line were three stories. In response to public comments received during the November 5, 2020 meeting, the applicant changed the height of the single-family homes in this location to two stories.

The Planned Development Permit will be conditioned to coordinate with VTA to provide bus stop improvements and duck-outs. The project has also been conditioned to provide street improvements such as a 21-foot wide sidewalk along the Camden Avenue project frontage and a 19-foot wide sidewalk along the Union Avenue project frontage, among other required improvements.

In response to the concern about density, projects within any Urban Village Plan area have a target density of 55 dwelling units per acre (du/acre) per the General Plan, and only projects adjacent to single-family homes are allowed to develop at lower densities, with a minimum of 30 du/ac. This project is within the Camden/Hillsdale Urban Village Plan area and includes a minimum density of 38 du/acre. The project is consistent with the General Plan policy for projects within an Urban Village since it is adjacent to single-family homes.

The current version of the plans received support from many members of the community who spoke at the November 5, 2020 community meeting. They felt like some of their concerns had been addressed and the applicant was responsive. Additionally, there were seven community meetings held by Council District 9 (D9) as summarized in the Staff Report to the Planning Commission.

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# **COORDINATION**

The preparation of this memorandum has been coordinated with the City Attorney's Office. Through this coordination, a clarification has been added to the Draft Development Standards making reference to the chapters of the Municipal Code establishing parkland obligations. The clarification is noted in red text under the Development Phasing section of the standards.

# **CLIMATE SMART SAN JOSÉ**

The recommendation in this memorandum aligns with one or more Climate Smart San José mobility goals. The project would facilitate mobility choices other than single-occupancy gaspowered vehicles, increase the density of new development (persons/jobs/acre), and facilitate job creation within City limits by providing high-density mixed use residential development with commercial retail and hotel uses in a central location within an identified growth area (Camden Avenue/Hillsdale Avenue Urban Village).

# **CEQA**

On September 21, 2017, an application for an Annexation, File No. Cambrian 37, and for a Planned Development Zoning, File No. PDC17-040, was submitted concurrently to the City of San José by owner/applicant Weingarten Realty Investors. In August 2021, the City was notified that the owner/applicant had changed to Weingarten Nostat, Inc. The City of San José, as the lead agency for the proposed project, prepared a Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2018022034, and was prepared for the Cambrian Park Mixed-Use Village Project (PD20-007, PDC17-040, ER20-189) in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The DEIR was circulated for public review and comment from November 12, 2021 through January 3, 2022.

An EIR was prepared because of the potential for significant and unavoidable impacts due to the project's size and location. The proposed project, with the implementation of identified mitigation measures, would not result in any significant and unavoidable impacts.

Mitigation measures were developed to lessen the following impacts to less than significant levels: exposure of sensitive receptors to toxic air contaminants during construction, disturbance and/or destruction of nesting migratory birds during construction, relocation of the historic onsite carousel sign, exposure of construction workers to residual contamination from agricultural chemicals in the soil, exposure of future occupants to the site to soil vapor intrusion from contaminated soils, cosmetic damage to adjacent residential structures from construction-generated vibration activities, exposure of adjacent uses to mechanical equipment noise, and exposure of sensitive receptors to construction noise.

Standard Permit Conditions are also required to ensure no impacts occur during the construction and operation of the project. These Standard Permit Conditions include best management practices for construction-related air quality impacts, protection of nesting migratory birds, compliance with the Santa Clara Valley Habitat Plan, protection of unknown subsurface cultural

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resources and human remains, erosion control during construction activities, water quality impacts during construction, best management practices to control noise during construction, and achieving an interior noise level of less than 45 dBA DNL after construction.

The project includes several features to reduce long-term air quality impacts on future project occupants, mandate Cultural Awareness training for construction personnel, require noise barriers and sound-rated windows, and provide full photo documentation of the existing shopping center buildings which are all made Conditions of Approval of the project.

#### **DEIR Recirculation Unnecessary**

The Draft EIR was circulated for public review for 45 days consistent with CEQA Guidelines Section 15132 starting on November 12, 2021 and ending on January 3, 2022. A First Amendment to the DEIR was prepared that provided responses to public comments submitted during the public circulation period and revisions to the text of the DEIR.

A total of 36 comment letters were received. Staff responded to the comments and questions in the First Amendment and none of the comments raised represents new significant information that would warrant recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5(a). The recirculation of an EIR is required when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review but before certification. "Information" can include changes in the project or environmental setting as well as additional data or other information. New information added to a Draft EIR is not "significant" unless the Draft EIR is changed in a way that deprives the public of meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (CEQA Guidelines Section 15088.5).

#### Final EIR

The First Amendment was posted on the City's website on July 1, 2022, and all commenters were notified via email of the document's availability. The Draft Environmental Impact Report (DEIR) and First Amendment are available for public review on the City's website: <a href="https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs">https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs</a>.

The First Amendment together with the DEIR constitutes the Final Environmental Impact Report (FEIR) for the proposed project.

July 19, 2022

Subject: File Nos. Cambrian No. 37 & PDC17-040

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# **Statement of Overriding Considerations**

A Statement of Overriding Considerations is not needed to be adopted by City Council for this project because there are no identified significant and unavoidable impacts.

/s/ CHRISTOPHER BURTON, Secretary Planning Commission

For questions, please contact Planning Official, Robert Manford, at (408) 535-7900.

Attachments: Revised Draft Development Standards Planning Commission Staff Report

#### CITY COUNCIL APPROVED DEVELOPMENT STANDARDS

#### **DEVELOPMENT STANDARDS**

#### **FILE NO. PDC17-040**

#### (CAMBRIAN PARK PLAZA MIXED-USE VILLAGE SIGNATURE PROJECT)

July 19, 2022

In any cases where the graphic plans and text may differ, this text takes precedence.

#### **ALLOWED USES**

- Residential uses shall conform to those identified for the R-M Multiple Residence Zoning
  District of the San José Municipal Code on the effective date of this Planned Development
  (PD) Zoning District (Effective Date) or, at the election of the applicant, as may be amended.
- Commercial uses shall conform to those identified for the CP Commercial Pedestrian Zoning
  District of the San José Municipal Code on the Effective Date or, at the election of the
  applicant, as may be amended, except that "Office, Research and Development" and
  "Research and Development" shall also be permitted uses.
- Privately Owned Public Open Space uses, as defined in Municipal Code Section 20.200.899 on the Effective Date or, at the election of the applicant, as may be amended, shall be a minimum of 4.0 acres.
- All permitted, conditional, administrative, and special uses shall require the approval of a Planned Development Permit or Planned Development Permit Amendment, except as follows:
  - o The following uses and structures are allowed without a Planned Development Permit or Planned Development Permit Amendment, in accordance with Chapter 20.80 in effect as of the Effective Date or, at the election of the applicant, as may be amended:
    - Certified Farmer's Markets with less than sixteen vendors in accordance with Part 3.5 of Chapter 20.80
    - Outdoor Vending Facilities with an Administrative Permit in accordance with Part 10 of Chapter 20.80
    - Seasonal Sales in accordance with Part 14 of Chapter 20.80
    - Temporary Outdoor Events meeting all the requirements of Part 16 of Chapter
       20.80 with an Event Permit
  - The following uses and structures are allowed by right without a Planned Development Permit, in accordance with Chapter 20.30, in effect as of the Effective Date, or at the election of the applicant, as may be amended:
    - Accessory dwelling units in accordance with Part 4.5 of Chapter 20.30

- Accessory structures in accordance with Part 5 of Chapter 20.30, only in conjunction with a primary structure
- Fences in accordance with Part 6 of Chapter 20.30
- Incidental uses in accordance with Section 20.30.110
- The following uses and structures are allowed by right without a Planned Development Permit, in accordance with Chapter 20.40 in effect as of the Effective Date, or at the election of the applicant, as may be amended:
  - Solar photovoltaic systems in accordance with Table 20-90
  - Incidental Uses in accordance with Sections 20.40.110 and 20.40.115
- All existing uses are permitted and may continue in accordance with the regulations of the base zone on any area of the site not yet developed pursuant to a Planned Development Permit.

#### **DEVELOPMENT PHASING**

Per General Plan Policy IP-5.10 in effect at the time of the project application, the commercial/office component of the Signature project must be constructed before or concurrently with the residential component.

- The Project subject to this Planned Development Zoning District is permitted to be constructed in phases, where a phase can consist of one or more than one building.
- Prior to the Certificate of Occupancy being issued for residential development in any phase, the commercial area of the building must be completed.
- Within any phase with residential uses, final certificates of occupancy for residential uses shall
  not be issued prior to the satisfaction of all Parklands Obligations for the residential units in the
  phase per Chapters 14.25 and 19.38 of the San Jose Municipal Code and recordation of all
  public access easements for the residential units in the phase, in form acceptable to City, for
  Privately Owned Public Open Space.

#### **DEVELOPMENT STANDARDS**

All development standards shall be pursuant to the R-M Multiple Residence Zoning District for residential uses or the CP Commercial Pedestrian Zoning District for commercial uses, except as follows:

#### **DENSITY:**

- Minimum Residential Density (excluding ADUs):
  - 38 dwelling units per net acre averaged across residential use area as designated within the General Development Plan

- 20 dwelling units per gross acre averaged across the 18.13-gross acre site as designated within the General Development Plan
- Minimum Commercial Square Footage: 275,000 square feet

#### **LOT STANDARDS**

- Minimum Single-Family Residence Lot Size: 2,800 square feet
- Minimum Single-Family Residence Lot Width: 35 feet

# **BUILDING HEIGHT:**

- Maximum building height for single-family homes:
  - o 32 feet where adjacent to existing residential lots
  - 35 feet for all others
- If any use other than single-family residential is proposed on the Project Site adjacent to the
  existing single-family residences along the eastern property line, then the 45-degree daylight
  plane requirement shall apply. This means that starting at the height equal to the setback,
  there must be one foot of setback for one foot of height, creating a 45-degree angle from the
  shared property line.
- Maximum building height is 98 feet to the top of roof, provided that elevator shafts, roof
  equipment, architectural roof features, stairwell overruns, and other non- habitable building
  elements can extend 15 feet past the maximum.

#### PROJECT BOUNDARY SETBACKS:

- North (Camden Ave) setback: 5 feet minimum from property line.
- West (Union Ave) setback: 5 feet minimum from property line.
- South setback: 12 feet minimum from property line.
- East/ Southeast setback adjacent to the rear property lines of existing single-family residences along Bercaw Lane:
  - o For single-family lots, 15 feet minimum.
  - o For any other use, 40 feet minimum, not to extend beyond a 45-degree stepback plane beginning at the existing grade of the adjacent rear property lines.

#### **INTERIOR SETBACKS**

- Single-Family Homes, minimum setbacks:
  - o Front 10 feet
  - Side minimum required per Fire and Building Code
  - o Rear 15 feet

- Townhomes, minimum setbacks:
  - o Common Driveway 4 feet
  - o Side property line 10 feet
  - Schaeffer Lane 5 feet
  - o Union Avenue 5 feet
  - o Open Space 4 feet

# **PARKING REQUIREMENTS:**

• **Vehicle parking** per the San José Municipal Code, Title 20, as may be amended, or at the following rates, subject to Section 20.900.220 of the Zoning Code for Reduction in Required Off-Street Parking Spaces, at the election of the applicant:

Use	Ratio Required
Commercial	4 spaces per 1,000 net square feet
Multi-Family Residential	1.5 spaces per unit
Hotel	1.2 spaces per guest room
Assisted Living	1 space per 3 beds plus 1 space per 2 full-time employees
Independent Senior Units	0.5 spaces per unit
Townhouse Residential	2.5 spaces per unit
Single-Family Homes	2.5 spaces per unit

• **Bicycle Parking** per Sections 20.90.190, 20.90.195, Table 20-190, and Table 20-210 of the San José Municipal Code, as may be amended, or at the following rates, at the election of the applicant:

Building / Use	Standard
Mixed-Use – Commercial Retail	1 per 3,000 sf of net floor area
Mixed Use – Residential	1 per 4 living units
Hotel	1 space plus one per 10 guest rooms
Hotel Commercial	1 per 800 sf of net floor area
Assisted Living	1 per 10 full-time employees
Independent Senior Units	1 per 4 living units

• **Motorcycle Parking** per Section 20.90.350 and Table 20-250 of the San José Municipal Code, as may be amended, or at the following rates, at the election of the applicant:

Building / Use	Standard
Mixed-Use– Commercial Retail	1 per 20 code-required auto spaces
Mixed Use – Residential	1 per 4 living units
Hotel Commercial	1 per 20 code-required auto spaces
Assisted Living	1 per 20 beds
Independent Senior Units	1 per 4 dwelling units

• **Loading Spaces** per Section 20.90.410 of the San José Municipal Code, as may amended, or at the following rates, at the election of the applicant:

Building / Use	Standard
Mixed-Use- Commercial Retail	Minimum one plus one for every 20,000 square feet of net square footage
Hotel	Minimum one plus one for every 20,000 square feet of net square footage
Assisted Living	Two spaces

• Commercial and multi-family residential parking may be shared among uses subject to a Planned Development Permit or Planned Development Permit Amendment.

#### ARCHITECTURAL AND SITE DESIGN GUIDELINES

**Ground Floor Interface** for ground floor commercial spaces (excluding the assisted living building) that front Union or Camden Avenues:

- Shall be at the same grade as the adjacent back of sidewalk or walkway, with reasonable variation allowable for gradient requirements and continuity of floor level.
- At least 50% transparency shall be provided on ground-floor commercial spaces. Windows and glazing shall be clear un-tinted glass.
- Shall provide a minimum of 40 feet of depth and minimum plate height of 17 feet for the ground floor in a commercial building

# **Building Massing**

- The composition of the facades shall include variety by providing recessions and projections.
- Building corners shall be articulated to create a focal point and/or plaza.

**Building Entrances** for uses such as lobbies, leasing centers, retail, and entertainment spaces:

• Shall be placed at the ground floor level

• Shall include appropriate transparency and a feature providing architectural identity, such as an awning, recess, or projection, to indicate the location of primary entries and articulate the façade.

**Streets and Sidewalks** – Any private street or driveway into the project shall be designed to provide the look and feel of a public street, including such features as a park strip, sidewalk, curb, and gutter.

# **CITY COUNCIL ADDED REQUIREMENTS**

If any

#### **ENVIRONMENTAL MITIGATION**

• The project shall conform to the Mitigation Monitoring and Reporting Program approved by the City Council for this project.

PLANNING COMMISSION AGENDA: 07-13-22

**ITEM:** 5.b.



# Memorandum

TO: PLANNING COMMISSION FROM: Christopher Burton

SUBJECT: Cambrian No. 37, PDC17-040 & DATE July 13, 2022

ER20-189

**COUNCIL DISTRICT:** 9

Type of Permit	Annexation and Planned Development Pre-zoning
Applicant / Owner	Michael Strahs, Weingarten Nostat, Inc.
Location	Southeast corner of Union Ave and Camden Ave (14200 &
	14420 Union Avenue)
Assessor Parcel Nos.	419-08-012 & 419-08-013
Existing Zoning	Unincorporated
Proposed Zoning	CP(PD) Planned Development
General Plan Land Use Designation	Neighborhood/Community Commercial
<b>Growth Area</b>	Camden Avenue/Hillsdale Avenue Urban Village Area
Historic Resource	N/A
Annexation Date	N/A
Annexation Acreage	19.92-gross acres (including bordering streets)
Pre-zoning Acreage	18.13-gross acres (project site only)
Project Planner	Laura Meiners
CEQA Clearance	Environmental Impact Report, State Clearinghouse No.
	2018022034, for the Cambrian Park Mixed-Use Village
	Project (PD20-007, PDC17-040, ER20-189) in compliance
	with the California Environmental Quality Act (CEQA) and
	the CEQA Guidelines
CEQA Planner	Kara Hawkins

# **RECOMMENDATION**

Staff recommends that the Planning Commission recommend the City Council to take all of the following actions regarding the project site located on the southeast corner of Union Ave and Camden Ave (14200 & 14420 Union Avenue) ("Project Site"):

1. Adopt a Resolution certifying the Environmental Impact Report (EIR) for the Cambrian Park Mixed-Use Village Project (SCH #2018022034), and make certain findings concerning mitigation measures and alternatives, and adopting a mitigation monitoring and reporting program, all in accordance with the California Environmental Quality Act (CEQA), as amended.

- 2. Approve an ordinance pre-zoning an approximately 18.13-gross acre site in Santa Clara County unincorporated territory designated as Cambrian No. 37 into the CP(PD) Planned Development Zoning District.
- 3. Adopt a resolution initiating proceedings and scheduling September 13, 2022 for City Council consideration of the reorganization of territory designated as Cambrian No. 37, which involves the annexation to the City of San José of approximately 19.92-gross acres of land from Santa Clara County unincorporated territory and the detachment of the same from the appropriate special districts.

#### **PROJECT BACKGROUND**

As shown on the attached Vicinity Map (Exhibit A), the Project Site is located within an unincorporated area of Santa Clara County on the southeast corner of Union Ave and Camden Ave (14200 & 14420 Union Avenue). The approximately 18.13-gross acre site is currently developed with an existing retail shopping center totaling 170,427 square feet and surface parking lots with a total of 764 existing parking spaces. The commercial area is comprised of multiple storefronts located within a central single-story building and additional retail businesses located within separate single-story buildings along the Camden Avenue street frontage. Vehicular access to the site is provided via three driveways along Union Avenue, including one at Woodard Road, one at Chelsea Drive, and one at the apartments to the south; two driveways along Camden Avenue, including one at Taper Avenue and one between Taper Avenue and Union Avenue; and one driveway extending from Wyrick Avenue at the rear of the project site.

The project site is bordered on two sides by Union Avenue and Camden Avenue, both major commercial thoroughfares. Land uses surrounding the site on the west side, across Union Avenue, are primarily commercial. A commercial strip mall extends from Camden Avenue south to Woodard Road that includes a donut shop, restaurants, martial arts studios, a tobacco shop, a massage business, a liquor store, a hair salon, and a shoe store. From Woodard Road south to Chelsea Drive, there is a gas station, a medical supply store, and single–family residences at the Chelsea Drive intersection. There is a commercial center located at the northwest corner of Union Avenue and Camden Avenue, to the northwest of the project site. It has two major anchor tenants – a chain drug store and a supermarket. Other tenants in the center include restaurants, a video game store, a bank, and a payday loan establishment. To the north of the site, at the northeast corner of the intersection, is a fast food establishment. The rest of the Camden Avenue frontage across from the site contains single family homes. Adjacent uses along the southeast boundary of the site include commercial office at the corner of Camden Avenue and Bercaw Lane, single-family homes, and a child daycare center. Multifamily residential buildings are located adjacent to the southerly tip of the project site, fronting on Union Avenue.

On September 21, 2017, an application for an Annexation, File No. Cambrian 37, and for a Planned Development Zoning, File No. PDC17-040, were submitted concurrently to the City of San José by owner/applicant Weingarten Realty Investors. In August 2021, the City was notified that the owner/applicant had changed to Weingarten Nostat, Inc. The Annexation project is to allow the annexation of the approximately 19.92-gross acre site into City of San José jurisdiction from the unincorporated Santa Clara County jurisdiction on the project site situated on the southeast corner of

Union Ave and Camden Ave (14200 & 14420 Union Avenue), including detachment from the appropriate special districts including the County Lighting District, Central Fire Protection District, West Valley Sanitation District, and Santa Clara County Library District. The Planned Development Zoning is a request to pre-zone approximately 18.13-gross acres to the CP(PD) Planned Development Zoning District to allow the demolition of 168,460 sf of existing commercial strip mall and surface parking lot, and the development of the project site with the following components:

- Building 1 50,990 sf of retail/restaurant use on the ground floor and 305 multifamily residential units on the upper floors
- Building 2 229 hotel rooms and 4,610 sf of commercial use
- Building 3 125,740 square feet of assisted living (110 beds) and 50 senior independent living units
- 25 townhouse residential units and 48 single-family homes, including 27 accessory dwelling units (ADUs)
- 4.0 acres of privately owned public open space (POPOS)

The annexation and pre-zoning are associated with a Planned Development Permit, File No. PD20-007, and a Vesting Tentative Map, File No. PT21-007. These two applications will be heard separately after the annexation has been certified by the Local Agency Formation Commission of Santa Clara County (LAFCO), pursuant to Section 20.120.300 of the Zoning Code at the Planning Director's Hearing. For purposes of CEQA compliance, please note that an Environmental Impact Report (EIR) was prepared for all the separate discretionary actions and planning activities associated with project entitlement and development of the project site.

SURROUNDING USES			
	General Plan	Zoning District	Existing Use
North	Neighborhood/Community Commercial & Residential Neighborhood	CN Commercial Neighborhood & R-1-8 Single-Family Residential	Carl's Jr. & Single-Family Residential
South	Residential Neighborhood	N/A – Unincorporated San Jose (County of Santa Clara)	Multifamily Residential
East	Neighborhood/Community Commercial & Residential Neighborhood	CO Commercial Office & R-1-8 Single-Family Residential	Commercial Office & Single- Family Residential
West	Neighborhood/Community Commercial & Residential Neighborhood	CP Commercial Pedestrian	Commercial Strip Mall, Texaco & Medical Supply Store

#### **ANALYSIS**

The proposed **Annexation** and **Planned Development Prezoning** have been analyzed with respect to consistency with:

- 1. Envision San José 2040 General Plan
- 2. Municipal Code Zoning Ordinance
- 3. City Council Policies
- 4. Commercial, Residential, and Single-Family Design Guidelines
- 5. California Environmental Quality Act (CEQA)

# **Envision San José 2040 General Plan Consistency**

As shown in the attached General Plan Map (Exhibit B), the subject site has an Envision San Jose 2040 General Plan designation of *Neighborhood/Community Commercial*. This designation supports a very broad range of commercial activity that have strong connections to and provide services and amenities for the nearby community. This designation supports development projects up to 3.5 floor area ratio (FAR). The project is also within the Camden Avenue/Hillsdale Avenue Urban Village Plan area, not yet adopted.

The pre-zoning consists of the General Development Plan (Exhibit J). Pursuant to Section 20.120.510, the General Development Plan includes a land use plan and a conceptual site plan showing conceptual location of uses, buildings, elevations illustrating the general architectural style and character, densities and heights, and development and use standards (Exhibit K) to implement the general plan through a subsequent Planned Development Permit. The General Development Plan is consistent with the General Plan as follows:

Analysis: The pre-zoning would allow a gross area of up to 349,310 square feet of commercial use and 556,180 square feet of residential use, which results in a total 1.15 FAR, which is greater than the existing FAR of 0.2 at the project site. This is consistent with the FAR requirement. However, residential and mixed-use projects are not permitted within the Neighborhood/ Community Commercial land use designation unless the project meets Policy IP-5.10 for Signature Projects. The pre-zoning is analyzed for consistency with the Signature Project Policy below:

#### Policy IP-5.10 Signature Project Analysis

The Signature Project policy allows residential and mixed-use projects to proceed ahead of an Urban Village Plan adoption if the project meets certain requirements related to residential density, project design, and the provision of employment space, parks and/or public and privately accessible open space on site. These requirements were updated in December 2021 to include additional requirements, but since the complete project application was submitted prior to the adoption of the updated policy, the previous requirements apply, as follows:

Incorporates job growth capacity above the average density of jobs/acre planned for the
developable portions of the entire Village Planning area and, for portions of a Signature project
that include housing, those portions incorporate housing density at or above the average density of
dwelling units per acre planned for the entire Village Planning area.

Analysis: This project is located within the Camden Avenue/Hillsdale Avenue Urban Village Plan area, which has not yet been adopted by City Council. Per the General Plan Land Use Policy section, within Growth Areas, new residential development is planned to occur at a density of at least 55 dwelling units per acre (du/ac), with some allowance for lower density projects of at least 30 du/ac at interfaces with existing single-family neighborhoods. The project is adjacent to single-family residential use to the north and east and is therefore required to provide a minimum of 30 du/ac. The pre-zoning would require a minimum residential density of 38 du/ac and is consistent with this requirement.

Based on the project site area, the existing commercial area to be demolished, and the planned job capacity of the Urban Village Plan per Appendix 5 of the General Plan, the development must provide more than 272,565 square feet of commercial area per this requirement. This translates to job growth using a rough estimate of one job per 300 square feet of commercial space. The project is therefore required to generate approximately 910 new jobs. The project, with 349,310 square feet of commercial space, meets this criterion and provides for the creation of approximately 1,165 new jobs.

2. Includes public parklands and/or privately maintained, publicly-accessible plazas or open space areas.

Analysis: The pre-zoning would require up to 4.0 acres of privately owned, publicly accessible open space (POPOS). This includes a 2.3-acre privately-owned community park area central to the project and fronting the new residential public street and a 1.7-acre area of plaza open space located in the interior courtyard of the corner mixed-use building. The project is consistent with the requirement.

- 3. Achieves the pedestrian friendly design guideline objectives identified within this General Plan.

  Analysis: The project is consistent with the following General Plan Community Design objectives relating to pedestrian orientation:
  - a. <u>Policy CD-1.7</u>: Require developers to provide pedestrian amenities, such as trees, lighting, recycling and refuse containers, seating, awnings, art, or other amenities, in pedestrian areas along project frontages. When funding is available, install pedestrian amenities in public rights-of-ways.
  - b. <u>Policy CD-1.11</u>: To create a more pleasing pedestrian-oriented environment, for new building frontages, include design elements with a human scale, varied and articulated facades using a variety of materials, and entries oriented to public sidewalks or pedestrian pathways. Provide windows or entries along sidewalks and pathways; avoid blank walls that do not enhance the pedestrian experience. Encourage inviting, transparent façades for ground-floor commercial spaces that attract customers by revealing active uses and merchandise displays.
  - c. <u>Policy CD-1.24</u>: Within new development, create and maintain a pedestrian-friendly environment by connecting the internal components with safe, convenient, accessible, and pleasant pedestrian facilities and by requiring pedestrian connections between building entrances, other site features, and adjacent public streets.
  - d. <u>Policy CD-2.3</u>: Create easily identifiable and accessible building entrances located on street frontages or paseos.

<u>Analysis</u>: The General Development Plan, Sheet A3.1, includes a conceptual pedestrian circulation plan that ensures connectivity throughout the project site and into adjacent neighborhoods. The project includes internal circulation and connectivity to the streets and sidewalks along Union and Camden Avenues, and includes a connection to the residential neighborhood via a paseo between the proposed and existing residential areas that also provides access from the neighborhood to the commercial and park areas of the project. The project is sensitive to the neighborhood while also providing connectivity. Pedestrian connectivity elements included in the project are a prominent arched entry at the intersection, paseos connecting the project to the existing sidewalks, and internal circulation promenades connecting the different areas of the project.

The Conceptual Site Plan, Sheet A3.0 of the General Development Plan, includes conceptual pedestrian amenities such as trees and landscaping throughout the site and particularly along the paseos, internal sidewalks, and perimeter sidewalks. The project will include additional details on lighting, seating, and other amenities during the Planned Development Permit stage.

The Conceptual Elevations, Sheets A7.0 thru A7.22 of the General Development Plan, include architecture showing design elements with a human scale, varied and articulated facades using a variety of materials, and entries oriented to public sidewalks. Pedestrian entries are accessed along sidewalks and pathways. Ground-floor commercial spaces include transparent glass that attract customers by revealing active uses and merchandise displays.

Additionally, the Planned Development Zoning Development Standards include the following architectural and site design standards related to pedestrian orientation:

**Ground Floor Interface** for ground floor commercial spaces (excluding the assisted living building) that front Union or Camden Avenues:

- Shall be at the same grade as the adjacent back of sidewalk or walkway, with reasonable variation allowable for gradient requirements and continuity of floor level.
- At least 50% transparency shall be provided on ground-floor commercial spaces. Windows and glazing shall be clear un-tinted glass.
- Shall provide a minimum of 40 feet of depth and minimum plate height of 17 feet for the ground floor in a commercial building

#### **Building Massing**

- The composition of the facades shall include variety by providing recessions and projections.
- Building corners shall be articulated to create a focal point and/or plaza.

**Building Entrances** for uses such as lobbies, leasing centers, retail, and entertainment spaces:

- Shall be placed at the ground floor level
- Shall include appropriate transparency and a feature providing architectural identity, such as an awning, recess, or projection, to indicate the location of primary entries and articulate the façade.

**Streets and Sidewalks** – Any private street or driveway into the project shall be designed to provide the look and feel of a public street, including such features as a park strip, sidewalk, curb, and gutter.

Specific design details in relation to the General Plan Community Design objectives relating to pedestrian orientation shall be analyzed within the associated future Planned Development Permit resolution and staff report.

4. Is planned and designed through a process that provided a substantive opportunity for input by interested community members.

Analysis: The project held two Joint Environmental Scoping and Community Meetings for the project and multiple meetings hosted by City of San Jose Council District 9 staff. The first Joint Community Meeting was held on March 5, 2018 in person, and the second meeting was held on November 5, 2020 via Zoom. There were approximately 244 members of the public in attendance at the 2018 meeting and approximately 132 members in attendance at the 2020 meeting.

During the March 5, 2018 meeting, there were concerns about height, density, traffic, parking, and public transit, among other issues discussed in the Public Outreach section below. The project height in the first draft of the project was up to seven stories, and based on community input, the applicant reduced the project height to a maximum of six stories.

The version of the plans shown at the March 5, 2018 meeting also had townhomes along the rear property line and a park area that was only one-acre in size. With the revised Site Plan submitted in 2020, the proposed project layout was changed to include single-family homes adjacent to the existing homes to the rear of the project site along Bercaw Lane and four acres of park and plaza area. Some of the single-family homes proposed along this property line were three stories. In response to public comments received during the November 5, 2020 meeting, the applicant changed the height of the single-family homes in this location to two stories.

The Planned Development Permit will be conditioned to coordinate with VTA to provide bus stop improvements and duck-outs. The project has also been conditioned to provide street improvements such as a 21-foot wide sidewalk along the Camden Avenue project frontage and a 19-foot wide sidewalk along the Union Avenue project frontage, among other required improvements.

In response to the concern about density, projects within any Urban Village Plan area have a target density of 55 dwelling units per acre (du/acre) per the General Plan, and only projects adjacent to single-family homes are allowed to develop at lower densities, with a minimum of 30 du/ac. This project is within the Camden/Hillsdale Urban Village Plan area and includes a minimum density of 38 du/acre. The project is consistent with the General Plan policy for projects within an Urban Village since it is adjacent to single-family homes.

This version of the plans received support from many members of the community who spoke at the November 5, 2020 community meeting. They felt like some of their concerns had been addressed and the applicant was responsive. See the Public Outreach section below for additional information about issues discussed. The community meetings held by Council District 9 (D9) include the following:

December 6, 2017 – Initial District-sponsored meeting between the applicant and community

April 11, 2019 – Second District-sponsored meeting between the applicant and community

March 3, 2020 – Public Open Space Town Hall

March 18, 2021 – Friends of Cambrian Park Plaza-initiated meeting with D9 and City staff invited

December 13, 2021 – Environmental Impact Report (EIR) Town Hall

January 21, 2022 – Initial discussion with specific residents concerned about the Taper and Camden intersection

June 9, 2022 – Follow-up discussion with community with over 50 attendees regarding the Taper and Camden intersection

5. Demonstrates high-quality architectural, landscape and site design features.

Analysis: The pre-zoning Plan Set includes conceptual architectural design, including floor plans and elevations, as required by Section 20.120.510 of the Zoning Code. The conceptual elevations within the general development plans include high-quality architectural features such as varied colors and materials, varied roof heights, and façade articulation including projections and recessions. The building elevations also call out high-quality materials such as stone, wood, metal, and glass.

The design elements of the corner mixed-use building are influenced by traditional urban European design with modern contemporary elements such as glass and metal at the ground floor. The hotel and assisted living building are modern contemporary with trims and accents influenced by traditional European design. These two architectural styles are complementary to each other and to the townhome and single-family home designs. For example, the rooftops for all project buildings are either flat or sloped, or a combination of both.

The windows, balconies, awnings, and architectural projections and recessions provided with the project design is consistent with the façade articulation guidelines. There is at least one projection, change in wall plane, or architectural feature that meets this guideline on all facades of the project. See additional analysis under the San Jose Design Guidelines Consistency section below. Additional analysis will be provided with the Planned Development Permit resolution and staff report.

6. Is consistent with the recommendations of the City's Architectural Review Committee or equivalent recommending body if the project is subject to review by such body.

Analysis: The project underwent the Urban Design Review process in December 2020, and there were recommendations regarding project architecture, including the design of the windows and the main archway from the corner of Camden and Union into the mixed-use building, the design of the single-family homes, and the design of the hotel and assisted living buildings.

The project was revised to be consistent with the recommendations as follows:

- a. The windows in the mixed-use building were redesigned to reduce the variations in size and shape.
- b. The main archway of the mixed-use building was redesigned to be more consistent in scale and design with the rest of the building.
- c. The single-family home architecture was redesigned to compliment the architecture of the adjacent parcels and remain consistent with the architecture of the development.

d. The Hotel and Assisted Living buildings were both very similar to each other in the original submittal, and the applicants were encouraged to use different architecture to reflect the distinctly different functions. The architecture of the assisted living building was redesigned to provide a large skylight protruding from the roofline as well as distinct stepped floors. The hotel architecture remained in a relatively traditional style.

The project is therefore consistent with Signature Project Policy IP-5.10.

In addition to the requirements of the Signature Project Policy IP-5.10, the project is also consistent with the following key General Plan policies:

- 1. <u>Fiscally Sustainable Land Use Policy FS-3.9:</u> Per City, County and LAFCO policy, locate existing and future urban development within city boundaries. Implement this policy through San José's existing agreement with Santa Clara County which requires that unincorporated properties within the Urban Service Area either annex to the City, if possible, or execute a deferred annexation agreement prior to approval of development.
- 2. <u>Implementation Policy IP-1.1:</u> Use the *Envision General Plan* Land Use/Transportation Diagram designations to indicate the general intended land use, providing flexibility to allow for a mix of land uses, intensities and development forms compatible with a wide variety of neighborhood contexts and to designate the intended roadway network to be developed over the timeframe of the Envision General Plan. Use the Zoning designation to indicate the appropriate type, form and height of development for particular properties.
- 3. <u>Implementation Policy IP-1.7</u>: Ensure that proposals to rezone and pre-zone properties conform to the Land Use / Transportation Diagram, and advance *Envision General Plan* Vision, goals and policies.
- 4. Implementation Policy IP-8.5: Use the Planned Development zoning process to tailor such regulations as allowed uses, site intensities and development standards to a particular site for which, because of unique circumstances, a Planned Development zoning process will better conform to Envision General Plan goals and policies than may be practical through implementation of a conventional Zoning District. These development standards and other site design issues implement the design standards set forth in the Envision General Plan and design guidelines adopted by the City Council.

<u>Analysis</u>: The subject property is within the City's Urban Growth Boundary and Urban Service Area and is connected to a street and parcels that are within the boundary of the City of San José. In accordance with the General Plan, projects within the Neighborhood/Community Commercial land use designation proposing residential or mixed-use development must be found consistent with the Signature Project Policy IP-5.10. The project meets the criteria of the Signature Project policy and advances the goals of the Urban Village Growth Area per the General Plan Land Use section.

The Planned Development Zoning includes development standards specific to the project site that would better conform to the Urban Village Growth Area aspect of the site and to the surrounding neighborhood character of single-family homes than the conforming zones to the Neighborhood/Community Commercial land use designation. For example, the conforming zones to the land use designation include CP Commercial Pedestrian, CG Commercial General, and CN

Commercial Neighborhood, none of which would allow the single-family homes or townhomes in the project, which are crucial aspects of the project in terms of community support.

The base zone of CP Commercial Pedestrian is intended to support pedestrian-oriented retail activity encourages mixed residential/commercial development where appropriate and is designed to support the commercial goals and policies of the general plan in relation to Urban Villages. This district is also intended to support intensive pedestrian-oriented commercial activity and development consistent with general plan urban design policies. More information about the CP Commercial Pedestrian base zone as compared to the General Development Plan is contained within the Zoning Ordinance Consistency section below.

# **Zoning Ordinance Consistency**

As shown in the attached Zoning Map (Exhibit C), the subject site is currently located in an unincorporated area of Santa Clara County and is not within an existing City zoning District. The Planned Development Zoning would pre-zone the site to the CP(PD) Planned Development Zoning District. The CP(PD) Zoning District would allow the site to be developed in accordance with the General Development Plan and the final Development and Use Standards adopted by the City Council. A draft of the use and development standards is attached as Exhibit K.

The project entails annexation of the approximately 18.13-gross acre site of unincorporated Santa Clara County to the City of San José, including detachment from the appropriate special districts including the County Lighting District, Central Fire Protection District, West Valley Sanitation District, and Santa Clara County Library District. Upon completion of the annexation proceedings, the subject site would be eligible to connect to City infrastructure and services, and the CP(PD) Zoning would be effectuated.

The annexation proceedings are being conducted pursuant to California Government Code Section 56757, which designates the City Council of the City of San José as the conducting authority. A full report regarding the proposed annexation will be provided to the City Council for the September 13, 2022 hearing.

# **Land Uses**

Per Section 20.100.130 of the zoning code, the Planned Development Permit is only eligible for a public hearing after the annexation is certified by LAFCO. Therefore, the Planned Development Permit will be reviewed at that time for consistency with the final adopted development and use standards at a publicly noticed hearing.

#### **Development Regulations**

All development standards shall be pursuant to the R-M Multiple Residence Zoning District for residential uses or the CP Commercial Pedestrian Zoning District for commercial uses, except as follows:

# 1. Density:

a. Minimum Residential Density (excluding ADUs):

- i. 38 dwelling units per net acre averaged across residential use area as designated within the General Development Plan
- ii. 20 dwelling units per gross acre averaged across the 18.13-gross acre site as designated within the General Development Plan
- b. Minimum Commercial Square Footage: 275,000 square feet

#### 2. Lot Standards:

- a. Minimum Single-Family Residence Lot Size: 2,800 square feet
- b. Minimum Single-Family Residence Lot Width: 35 feet

# 3. Building Height:

- a. Maximum building height for single-family homes:
  - i. 32 feet where adjacent to existing residential lots
  - ii. 35 feet for all others
- b. If any use other than single-family residential is proposed on the Project Site adjacent to the existing single-family residences along the eastern property line, then the 45-degree daylight plane requirement shall apply. This means that starting at the height equal to the setback, there must be one foot of setback for one foot of height, creating a 45-degree angle from the shared property line.
- c. Maximum building height is 98 feet to the top of roof, provided that elevator shafts, roof equipment, architectural roof features, stairwell overruns, and other non- habitable building elements can extend 15 feet past the maximum.

# 4. Project Boundary Setbacks:

- a. North (Camden Ave) setback: 5 feet minimum from property line.
- b. West (Union Ave) setback: 5 feet minimum from property line.
- c. South setback: 12 feet minimum from property line.
- d. East/ Southeast setback adjacent to the rear property lines of existing single-family residences along Bercaw Lane:
  - i. For single-family lots, 15 feet minimum
  - ii. For any other use, 40 feet minimum, not to extend beyond a 45-degree stepback plane beginning at the existing grade of the adjacent rear property lines

#### 5. Interior Setbacks:

- a. Single-Family Homes, minimum setbacks:
  - i. Front 10 feet
  - ii. Side minimum required per Fire and Building Code
  - iii. Rear 15 feet

- b. Townhomes, minimum setbacks:
  - i. Common Driveway 4 feet
  - ii. Side property line 10 feet
  - iii. Schaeffer Lane 5 feet
  - iv. Union Avenue 5 feet
  - v. Open Space 4 feet

# 6. Parking:

a. **Vehicle parking** per the San José Municipal Code, Title 20, as may be amended, or at the following rates, subject to Section 20.900.220 of the Zoning Code for Reduction in Required Off-Street Parking Spaces, at the election of the applicant:

Use	Ratio Required
Commercial	4 spaces per 1,000 net square feet
Multi-Family Residential	1.5 spaces per unit
Hotel	1.2 spaces per guest room
Assisted Living	1 space per 3 beds plus 1 space per 2 full-time employees
Independent Senior Units	0.5 spaces per unit
Townhouse Residential	2.5 spaces per unit
Single-Family Homes	2.5 spaces per unit

b. **Bicycle Parking** per Sections 20.90.190, 20.90.195, Table 20-190, and Table 20-210 of the San José Municipal Code, as may be amended, or at the following rates, at the election of the applicant:

Building / Use	Standard
Mixed-Use – Commercial Retail	1 per 3,000 sf of net floor area
Mixed Use – Residential	1 per 4 living units
Hotel	1 space plus one per 10 guest rooms
Hotel Commercial	1 per 800 sf of net floor area

Assisted Living	1 per 10 full-time employees
Independent Senior Units	1 per 4 living units

c. **Motorcycle Parking** per Section 20.90.350 and Table 20-250 of the San José Municipal Code, as may be amended, or at the following rates, at the election of the applicant:

Building / Use	Standard
Mixed-Use– Commercial Retail	1 per 20 code-required auto spaces
Mixed Use – Residential	1 per 4 living units
Hotel Commercial	1 per 20 code-required auto spaces
Assisted Living	1 per 20 beds
Independent Senior Units	1 per 4 dwelling units

d. **Loading Spaces** per Section 20.90.410 of the San José Municipal Code, as may amended, or at the following rates, at the election of the applicant:

Building / Use	Standard
Mixed-Use- Commercial Retail	Minimum one plus one for every 20,000 square feet of net square footage
Hotel	Minimum one plus one for every 20,000 square feet of net square footage
Assisted Living	1 space

e. Commercial and multi-family residential parking may be shared among uses subject to a Planned Development Permit.

Analysis: Any future Planned Development Permit associated with the Planned Development Zoning shall adhere to these development standards.

# **City Council Policy Consistency**

City Council Policy 6-30: Public Outreach Policy for Pending Land Use Development Proposals

Under City Council Policy 6-30, the project is a Significant Community Interest development. These development projects are required to provide Early Notification by website, email, postcard mailed to property owners and tenants within a 1,000-foot radius, and by on-site signage. Following City Council Policy 6-30, the required on-site sign has been posted at the site since October 20, 2017, to inform the

neighborhood of the project. An updated on-site sign with information regarding the Planned Development Permit and Vesting Tentative Map has been posted on the site since March 2, 2021. The project held two Joint Environmental Scoping and Community Meetings for the project and multiple meetings hosted by Council District 9. The first Joint Community Meeting was held on March 5, 2018 in person, and the second meeting was held on November 5, 2020 via Zoom. There were approximately 244 members of the public in attendance at the 2018 meeting and approximately 132 members in attendance at the 2020 meeting. See the Public Outreach section below for additional information about issues discussed. Public Notices of the community meeting and public hearing were distributed to the owners and tenants of all properties located within 1,000 feet of the project site and posted on the City website. The staff report is also posted on the City's website. Staff has been available to respond to questions from the public.

# San Jose Design Guidelines Consistency

The project was analyzed for consistency with applicable Commercial Design Guidelines (1990) for the hotel, assisted living, and retail uses, the Residential Design Guidelines (1999) for the mixed-use residential and townhome uses, and the Single-Family Design Guidelines for the single-family residential uses. Per Senate Bill 330, effective January 1, 2020, only objective standards and guidelines can be applied to certain affordable housing projects. Objective standards per SB 330 must be measurable and quantifiable.

The updated Citywide Guidelines were adopted on February 23, 2021 and effective March 25, 2021. These updated guidelines include objective standards in response to the requirements of SB 330. The subject project, submitted on January 5, 2021, was submitted prior to the effective date of the new guidelines and therefore subject to the previous Commercial and Residential Design Guidelines.

The project complies with the following key guidelines below:

#### **Commercial Design Guidelines**

<u>Section 2.A.3</u>: Corner buildings should have a strong tie to the setback lines of each street. The primary mass of the building should not be placed at an angle to the corner. This does not preclude angled or sculpted building corners, or an open plaza at the corner.

Analysis: The mixed-use building at the corner of Union and Camden Avenues will be placed five feet from the sidewalk on both streets, consistent with the setback requirements of the Development Standards. The building placement is square to the corner and not placed at an angle, although the arched main pedestrian entry is angled to the corner to provide accessibility to pedestrians from both Union Avenue and Camden Avenue. The Development Standards require that building corners be articulated to create a focal point and/or plaza Therefore, the project is consistent with this guideline.

<u>Section 2.C.2</u>: The exterior building design, including roof style, color, materials, architectural form and detailing, should be consistent among all buildings in a complex and on all elevations of each building to achieve design harmony and continuity within itself and with its surroundings.

Analysis: The design elements of the corner mixed-use building is influenced by traditional urban European design with modern contemporary elements such as glass and metal at the ground floor. The hotel and assisted living building are modern contemporary with trims and accents influenced by

traditional European design. These two architectural styles are complementary to each other and to the townhome and single-family home designs. For example, the rooftops for all project buildings are either flat or sloped, or, like the mixed-use building, the assisted living building, and the townhomes, a combination of both. Shared materials include stone cladding, wood siding, and stucco. Shared colors include white, pink, brown, and gray. See the rendering of the hotel building below for reference:



Figure 1 – Conceptual Rendering of the Hotel looking Southwest from Camden Avenue

<u>Section 2.D.1</u>: Roof design should conform to legitimate forms, i.e. hipped, gabled, or flat, etc. Superficial application of artificial roof elements, such as the mansard style roof to disguise a flat roof should not be used. This does not preclude roof top equipment wells when set behind conventional roof forms.

Analysis: The roof style of all project buildings is either flat or sloped or a combination of both. The mixed-use building on the corner of Union and Camden Avenues includes varied roof heights. All mechanical equipment is shielded from view from the street.

#### **Residential Design Guidelines**

<u>Chapter 11.A Façade Articulation.</u> All building facades containing 3 or more attached dwellings in a row should incorporate at least one of the following:

- 1. At least one architectural projection per unit. Such a projection must project no less than 2 feet 6 inches from the major wall plane, must be between 4 feet 6 inches and 15 feet wide, or
- 2. A change in wall plane of at least 3 feet for at least 12 feet every 2 units.

Analysis: The windows, balconies, awnings, and architectural projections and recessions provided with the project design is consistent with the façade articulation guidelines. There is at least one projection, change in wall plane, or architectural feature that meets this guideline on all facades of the project. The

conceptual elevations and renderings are consistent with the Development Standards, which require composition of the facades shall include variety by providing recessions and projections as illustrated in the project rendering below.



Figure 2 – Conceptual Rendering of the Mixed-Use Building looking Southeast from the Corner of Union Avenue and Camden Avenue

<u>Chapter 11.E. Changes in Materials</u>. The exterior materials and architectural details of a single building should relate to each other in ways that are traditional and/or logical. Material changes not accompanied by changes in plane also frequently give material an insubstantial or applied. There are, however, exceptions to this principle such as the articulation of the base of a building by a change in color, texture or material.

Analysis: The project includes multiple changes in plane, materials, and color throughout all facades of the project. The project successfully incorporates materials and colors that relate to each other between the buildings. Some changes to materials and textures are intended as focal points, including the large arched entryway shown above at the corner of Camden and Union Avenues.

#### **Single-Family Design Guidelines**

<u>Section 1.C.3</u>. Main entries should be prominent and oriented to the street unless another pattern is well established on the block, and in appropriate scale for the block as well as the individual building.

Analysis: The main entrances of the conceptual single-family home designs are prominent and face the street. None of the single-family home designs have main entryways that are out of scale for the structure.

<u>Section 1.D.1</u>. In general, new garages should be located and sized consistent with the established pattern in the neighborhood. In neighborhoods with an established pattern of attached garages, attached garages located at the front of the house should be no wider than one half the width of the house.

Analysis: The adjacent single-family homes in surrounding neighborhoods all have a pattern of front-facing attached garages. All the conceptual single-family home designs also have front-facing attached garages. Specific dimensions of the garages in comparison to the width of the homes will be analyzed during subsequent Planned Development Permit review.

Section 2.A.3. Building forms should be varied enough to avoid monotony and to be compatible with surrounding houses but should still be simple and elegant.

Analysis: There are a total of seven conceptual elevations within the Planned Development Zoning Plan Set (Exhibit J) for the 48 single-family homes. This provides variety in design, and along with changes in color and materials provides variety in appearance. The single-family home designs are not overly complex but keep to traditional design features which result in simple and elegant design. See example conceptual single-family home design rendering:



Figure 3 – Conceptual Rendering of the Single-Family Homes looking Southwest from the internal playground

# CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

A Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2018022034, was prepared for the Cambrian Park Mixed-Use Village Project (PD20-007, PDC17-040, ER20-189) in compliance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The DEIR was circulated for public review and comment from November 12, 2021 through January 3, 2022.

An EIR was prepared because of the potential for significant and unavoidable impacts due to the project's size and location. The proposed project, with implementation of identified mitigation measures, would not result in any significant and unavoidable impacts.

Mitigation measures were developed to lessen the following impacts to less than significant levels: exposure of sensitive receptors to toxic air contaminants during construction, disturbance and/or

destruction of nesting migratory birds during construction, relocation of the historic on-site carousel sign, exposure of construction workers to residual contamination from agricultural chemicals in the soil, exposure of future occupants to the site to soil vapor intrusion from contaminated soils, cosmetic damage to adjacent residential structures from construction-generated vibration activities, exposure of adjacent uses to mechanical equipment noise, and exposure of sensitive receptors to construction noise.

Standard Permit Conditions are also required to ensure no impacts occur during construction and operation of the project. These Standard Permit Conditions include best management practices for construction related air quality impacts, protection of nesting migratory birds, compliance with the Santa Clara Valley Habitat Plan, protection of unknown subsurface cultural resources and human remains, erosion control during construction activities, water quality impacts during construction, best management practices to control noise during construction, and achieving an interior noise level of less than 45 dBA DNL after construction.

The project includes several features to reduce long-term air quality impacts on future project occupants, mandate Cultural Awareness trainings for construction personnel, require noise barriers and sound rated windows, and provide full photo-documentation of the existing shopping center buildings which are all made Conditions of Approval of the project.

## **DEIR Recirculation Unnecessary**

The Draft EIR was circulated for public review for 45 days consistent with CEQA Guidelines Section 15132 starting on November 12, 2021 and ending on January 3, 2022.

A First Amendment to the DEIR was prepared that provided responses to public comments submitted during the public circulation period and revisions to the text of the DEIR.

A total of 36 comment letters were received.

Staff responded to the comments and questions in the First Amendment and none of the comments raised represents new significant information that would warrant recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5(a). The recirculation of an EIR is required when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR for public review but before certification. "Information" can include changes in the project or environmental setting as well as additional data or other information. New information added to a Draft EIR is not "significant" unless the Draft EIR is changed in a way that deprives the public of meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (CEQA Guidelines Section 15088.5).

## Final EIR

The First Amendment was posted on the City's website on July 1, 2022, and all commenters were notified via email of the document's availability. The Draft Environmental Impact Report (DEIR) and First Amendment are available for public review on the City's website:

https://www.sanjoseca.gov/your-government/departments/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs.

The First Amendment together with the DEIR constitute the Final Environmental Impact Report (FEIR) for the proposed project.

## Statement of Overriding Considerations

A Statement of Overriding Considerations is not needed to be adopted by City Council for this project because there are no identified significant and unavoidable impacts.

## **PUBLIC OUTREACH**

Staff followed Council Policy 6-30: Public Outreach Policy to inform the public of the proposed project. An on-site sign was posted on the property and noticed Joint Environmental Scoping and Community Meetings were held on March 5, 2018 in person, and on November 5, 2020 via Zoom. There were approximately 244 members of the public in attendance at the 2018 meeting and approximately 132 members in attendance at the 2020 meeting. City Council District 9 staff also hosted multiple meetings with the community in addition to the Planning-sponsored meetings.

There were several distinct versions of the Plan Set and public comments on each version during review. Each version was in response to public comments received. The following summary of public comments are separated out by Site Plan version, beginning with the comments received at the two Joint Environmental Scoping and Community Meetings. A representative summary of concerns raised during the meetings include the following:

# March 5, 2018 Joint Environmental Scoping and Community Meeting

- 1. There are concerns about the Urban Village designation and the application of Signature Project policies at this site. Why was this site designated as Urban Village? The area is not urban.
- 2. There are concerns about traffic. The existing traffic conditions in the neighborhood, and especially at this intersection, are already impacted. Adding more units and uses will only exacerbate the problem. Is there a plan to improve the traffic conditions at this intersection?
- 3. There is a concern that the rear driveway will be used as a cut-through to avoid the light at Camden Avenue and Union Avenue, causing additional traffic on residential streets Wyrick Avenue and Bercaw Lane. The access point at Wyrick Avenue needs to be closed to vehicles and only open for pedestrians and bicyclists.
- 4. Will VTA be improving transit access at this location?
- 5. There is a concern that there are no sidewalks available for pedestrians in the areas adjacent to the project site that are unincorporated. Will sidewalks be added?
- 6. Regarding height, this project will impact the views of the Los Gatos Hills. A height of seven stories is too much for the neighborhood. There are no surrounding buildings exceeding two stories in height.
- 7. The parking should be placed underground, not surface parking. The number of parking spaces provided is too low. There is a concern that there will be overflow parking onto the residential streets.
- 8. The park space should be at least three acres. It would be nice to have a dog park, a public swimming pool, a community garden, and/or a sports field.

- 9. The architecture looks too flat and boxy. Add some architectural details with Mediterranean or Mission style architecture.
- 10. The residential units should include affordable housing.
- 11. The carousel sign is historic. Will it be saved?
- 12. The area experiences frequent droughts and there is a concern about water usage for the new residential units. Where will the water come from if we are already in drought conditions?

Staff also received emails from community members in 2018 and 2019 with comments regarding the December 2017 iteration of the plans. In addition to the concerns raised in the Community Meeting as outlined above, the concerns raised during the initial review process include the following:

- 1. This project is too tall and too dense for the area, which is otherwise suburban.
- 2. The existing 1-acre park is too small. The location of the park is hidden behind the tall buildings placed along the street. Signage would be required for the public to find the park.
- 3. The distance between the traffic lights along Union and Camden is too short. There should not be any additional signals added.
- 4. The project would be better with only retail, restaurants, the assisted living, and the hotel buildings. Adding additional housing is too much.
- 5. Most of the homes in the Cambrian district are 50 years or older. The design of the project should reflect the history of the neighborhood, not the modern contemporary design shown.
- 6. There is a concern about police and fire response times and general crime in the area. Since this is a border area between the City and the County, the area gets neither police nor sheriff response in a timely manner.
- 7. There should be noise restrictions during events. No loud noises after 7:00 p.m.
- 8. The General Plan designation for the project site is Neighborhood/Community Commercial, which does not allow residential uses. Additionally, the designation includes a height limit of 5 stories. The project is inappropriate for the site.
- 9. The hotels and convalescent home will have a substantial transient population, which won't lead to a village feel, or a center, for the Cambrian residents.

### November 5, 2020 Joint Environmental Scoping and Community Meeting

This meeting was held via Zoom, and everyone who attended the meeting was able to voice their concerns by either raising their hand or typing their question in the chat. The Zoom chat during this meeting was logged and sent to the community with responses to each question. The chat is formatted as an Excel table and is in the hearing packet along with the other Public Comments.

This version of the plans received support from the community. They felt like some of their concerns had been addressed and the applicant was responsive. The following is a representative summary of the comments during the November 5, 2020 Community Meeting:

1. Height and density are still a concern. The project should be four stories maximum.

- 2. People are using Taper Avenue as a cut-through from Camden to Union Avenues to the north of the site. Is there a way to install speed bumps? Is there a signal proposed at this intersection?
- 3. Do the single-family homes have additional parking spaces?
- 4. There are three-story single-family homes proposed along the rear property line, adjacent to the homes on Bercaw Lane. There are concerns about privacy issues and residents looking down into the private backyards of their neighbors.

Staff also received emails from community members in 2020 and 2021 with comments regarding the current iteration of the plans. In addition to the concerns raised in the Community Meeting as outlined above, the concerns raised during the review process include the following:

- 1. The setback to the single-family homes seems to be only ten feet. Is this correct? Does the 45-degree daylight plane apply?
- 2. The architectural design still looks flat and too modern.
- 3. Please add protected bike lanes and bike parking at the project site
- 4. The developer should be required to stripe a dedicated right turn lane from Union onto Camden.
- 5. Taper Avenue isn't the only street that needs traffic calming measures. New Jersey Avenue and Woodard Road also need traffic calming.

# Staff Responses

In response to the concerns about why this area is designated as an Urban Village, there are four different types of Urban Villages defined in the General Plan, including Regional Transit, Local Transit, Commercial Corridor, and Neighborhood Urban Villages. The Camden/Hillsdale Urban Village Plan is designated as a Commercial Corridor Urban Village. Commercial Corridor Urban Villages are planned to take advantage of the redevelopment potential for existing, underutilized commercial sites. These sites were identified primarily because of their redevelopment potential. These larger regional commercial center Urban Villages will function as complete destinations that integrate a mix of high density housing, employment, and services within existing key business areas to create dynamic urban settings.

Policy IP-5.10 of the General Plan describes the criteria necessary to be able to construct residential and mixed-use projects within land use designations that normally would not allow such use, including the Neighborhood/Community Commercial designation. Such projects are called Signature Projects and must be in areas designated as Urban Villages in the General Plan. The analysis of the Signature Project criteria is detailed above.

In response to the concerns about traffic, a Local Transportation Analysis was prepared and reviewed by Public Works and CEQA staff. The report concluded that the project-generated vehicle miles traveled (VMT) would not exceed the City's threshold of 10.12 VMT per capita for residential uses in the area by 2.5 VMT per capita. The analysis showed that no additional Mitigation Measures would be required to be implemented to lower the project's VMT to threshold levels. Therefore, the impact would be less than significant.

In regard to the traffic due to the signalized intersections along Camden and Union Avenues, the City is working together with the County to synchronize these signals for a reduced wait time at each intersection. Additionally, the driveway through to Wyrick Avenue was closed to vehicles and only open to pedestrians and bicyclists as a result of the first Community Meeting.

VTA has been made aware of the request for additional service at this area. The project is being conditioned to coordinate with VTA to provide bus stop improvements and duck-outs. The project has also been conditioned to provide a 21-foot wide sidewalk along the Camden Avenue project frontage and a 19-foot wide sidewalk along the Union Avenue project frontage.

In response to the concerns about the project height, the maximum height of new construction is 120 feet within Urban Village Plan boundaries per Section 20.85.020.E of the Zoning Code. The project height in the first draft of the project was up to seven stories, and based on community input, the applicant reduced the project height to a maximum of six stories. Impacts to scenic views are analyzed in the Environmental Impact Report for the project.

With the revised Site Plan submitted in 2020, the project layout was changed to include single-family homes adjacent to the existing single-family homes to the rear of the project site along Bercaw Lane. Some of the single-family homes proposed along this property line were three stories. In response to public comments received, the applicant changed the height of the single-family homes in this location to two stories. The 45-degree stepback plane that was previously applied to townhome use would not apply to single-family homes. The daylight plane is intended to protect single-family residential uses from higher intensity uses, not from other single-family uses. The rear yard setback from the new single-family homes to the existing homes is 15 feet, not 10 feet.

In response to the concern about overflow parking, the parking ratios within the Planned Development Zoning Development Standards exceeds the parking requirements of the Zoning Code. For example, the parking ratio for the single-family homes and the townhomes is 2.5 spaces per unit, where the requirement per the Zoning Code is two spaces per unit. The project also includes standards for minimum bicycle parking, motorcycle parking, and loading spaces.

In response to the concerns about the on-site park, while the original Site Plan included a park approximately one-acre in size, the current plan has a park 2.3 acres in size and a plaza 1.7 acres in size for a total of 4.0 acres of open space. These areas are designated as publicly accessible and privately owned and maintained.

In response to the concern about density, projects within any Urban Village Plan area have a target density of 55 dwelling units per acre (du/acre) per the General Plan, and only projects adjacent to single-family homes are allowed to develop at lower densities, with a minimum of 30 du/ac. This project is within the Camden/Hillsdale Urban Village Plan area and includes a minimum density of 38 du/acre. The project is consistent with the General Plan policy for projects within an Urban Village.

In response to the concerns about the architecture looking too flat and boxy, City staff worked with the applicant during review to ensure that all project architecture was consistent with the Residential, Commercial, and Single-Family Design Guidelines, including appropriate façade articulation, proportion, colors, and materials. The project is consistent with the Design Guidelines. In response to the concern about the historic carousel sign, the project is proposing to retain and relocate the sign to a more prominent location along Union Avenue adjacent to the right-of-way.

As to the concern about water supply, the project obtained a Water Supply Assessment from the Santa Clara Valley Water District, which indicated that the water supply is sufficient to address water demand generated from this development. Additionally, during the Building Permit process, projects are required to comply with low-flow requirements per California's Title 20 Water Efficiency Standards. As old appliances are replaced with new low-flow appliances, water efficiency is increased.

In response to the request for traffic calming, bike lanes and a dedicated right-turn lane, the project will be conditioned to provide several street improvements with the Planned Development Permit, including a radar speed sign and traffic calming on Woodard Avenue, Class IV bike lanes along Union Avenue and Camden Avenue, signal modifications at the Union/Camden intersection and the Woodard/Union intersection, and a dedicated right-turn lane at the Union Avenue project driveway.

A notice of the public hearing was distributed to the owners and tenants of all properties located within 1,000 feet of the project site and posted on the City website. The staff report is also posted on the City's website. Staff has been available to respond to questions from the public.

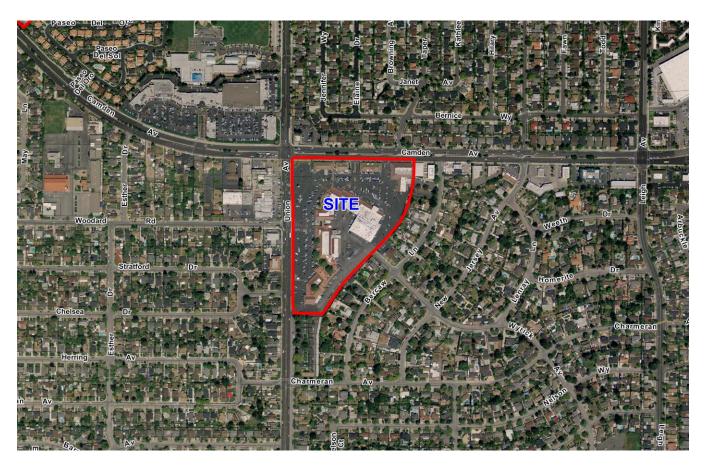
**Project Managers:** Laura Meiners

**Approved by:** /s/ Robert Manford, Deputy Director for Christopher Burton, Planning Director

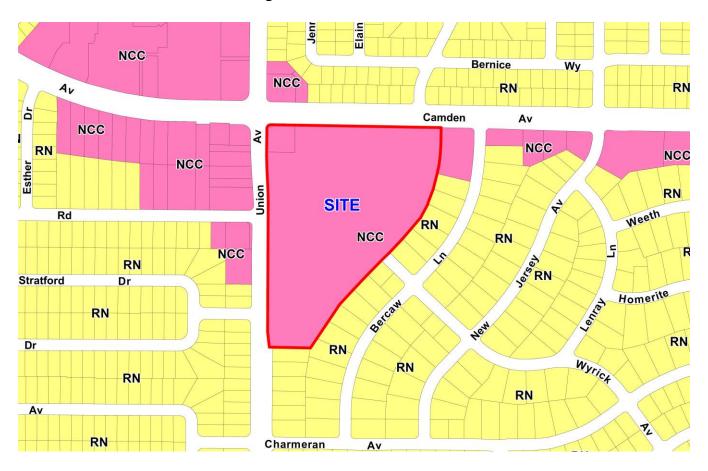
ATTACHMENTS:				
Exhibit A:	Vicinity Map, Aerial			
Exhibit B:	General Plan Land Use Designation			
Exhibit C:	Existing Zoning Map			
Exhibit D:	Proposed Zoning Map			
Exhibit E:	Cambrian No. 37 Annexation Initiating Resolution			
Exhibit F:	PDC17-040 Pre-zoning Ordinance			
Exhibit G:	Environmental Impact Report Resolution and Mitigation Monitoring and Reporting			
	Program (MMRP)			
Exhibit H:	Annexation Plat Map and Legal Description			
Exhibit I:	Pre-zoning Plat Map and Legal Description			
Exhibit J:	PDC17-040 Pre-zoning Plan Set			
Exhibit K:	PDC17-040 Draft Development Standards			
Exhibit L1:	2018-2019 Public Correspondence			
Exhibit L2:	2020-2022 Public Correspondence			
Exhibit L3:	Letters of Support			
Exhibit L4:	Applicant's Letter to the Planning Commission			

Development Review Project	Environmental Project Manager	Applicant Contact	
Manager			
Laura Meiners	Kara Hawkins	Sean Morley	
Laura.Meiners@sanjoseca.gov	kara.hawkins@sanjoseca.gov	sean@morleybros.com	
(408) 535-7869	(408) 535-7852	(408) 806-4804	

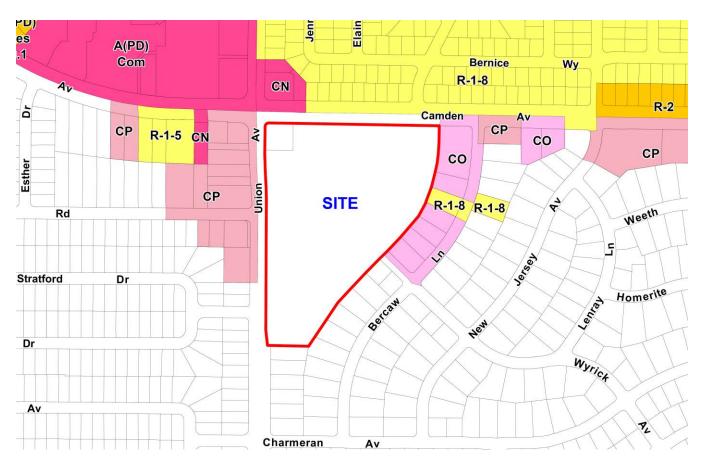
Exhibit A: Vicinity Map/Aerial



**Exhibit B: General Plan Land Use Designation** 



**Exhibit C: Existing Zoning Map** 



**Exhibit D: Proposed Zoning Map** 



# **Cambrian No. 37 & PDC17-040**

# **Links to Attachments E-L4**

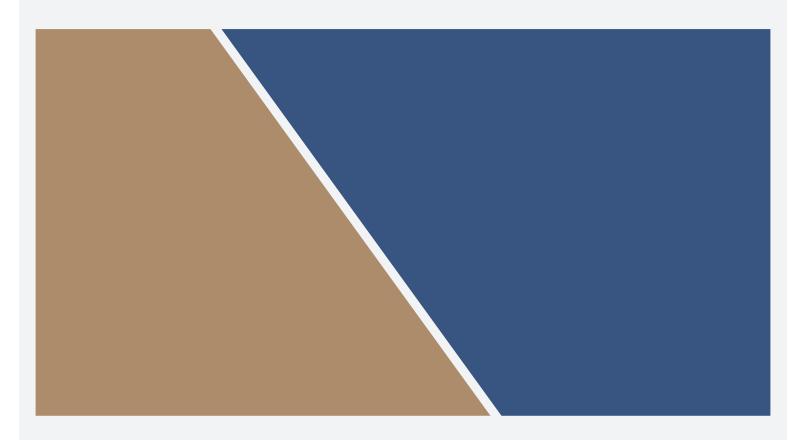
Click on the title to view document

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# Responses to Public Comments on the Final Environmental Impact Report

# Cambrian Park Mixed-Use Village Project

File Nos. PDC17-040 and PD20-007







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# **SECTION 1.0 RESPONSES TO FINAL EIR COMMENTS**

This document includes written responses to a comment letter received by the City of San José on the Final EIR on July 13, 2022, from an attorney on behalf of "Silicon Valley Residents for Responsible Development."

A copy of the letter is on file with the City of San José is. Comments received on the Final EIR are listed below.

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### RESPONSES TO PUBLIC COMMENTS ON FEIR

#### i. Introduction

Comment i.1: We are writing on behalf of Silicon Valley Residents for Responsible Development ("Silicon Valley Residents") provide comments on the Staff Report for the Cambrian Park Mixed-Use Village Project (File No. PDC17-040, PD20-007, CAMBRIAN 37, and SCH No. 2018022034) ("Project"), proposed by Weingarten Realty ("Applicant"), prepared by the City of San Jose ("City"), as well as the Final Environmental Impact Report ("FEIR") and Responses to Comments ("RTC") prepared pursuant to the California Environmental Quality Act ("CEQA"). The Project site is located at 14200 and 14420 Union Avenue (Assessor's Parcel Numbers ("APNs") 419-08-012 and -013) ("Site").

Staff's recommendation is for the Planning Commission to recommend that the City Council certify the FEIR, approve an ordinance to pre-zone the site, and adopt a resolution initiating annexation proceedings is unsupported and based on a deficient FEIR. The Project cannot be recommended for approval at this time because the City has not conducted a legally sufficient environmental review of the Project pursuant to CEQA. The City lacks substantial evidence to support the FEIR's conclusions that impacts will be less than significant. The FEIR also relies on ineffective and unenforceable mitigation measures that fail to adequately reduce impacts. The Planning Commission cannot recommend approval of the Project in reliance on a legally inadequate FEIR.

These comments demonstrate that the FEIR's public health, noise, transportation, energy use, and water supply analyses remain substantially inaccurate and incomplete. The RTC also fails to meaningfully respond to many of the technical comments on the DEIR and fails to resolve many of the legal and evidentiary deficiencies we previously identified in the DEIR.1 As a result, the FEIR fails to adequately disclose the Project's potentially significant impacts, as required by CEQA.

We prepared our comments with the assistance of technical experts, including air quality, GHG emissions, and health risk assessment experts Matt Hagemann, P.G., C.Hg., and Paul E. Rosenfeld, Ph.D., at Soil / Water / Air Protection Enterprise ("SWAPE"); traffic and transportation expert Daniel T. Smith Jr., P.E.; and noise expert Derek Watry. SWAPE's comments, Mr. Hagemann's curriculum vitae, and Mr. Rosenfeld's curriculum vitae are attached to this letter as Exhibit A. Mr. Smith's comments and his curriculum vitae are attached to this letter as Exhibit B. Mr. Watry's comments and his curriculum vitae are attached to this letter as Exhibit C. We reserve the right to supplement these comments at a later date, and at any later proceedings related to this Project.

For the reasons stated herein, Silicon Valley Residents urges the Planning Commission to consider these comments and direct Staff to revise and recirculate the EIR for further public comment. The Project cannot be approved and should not be rescheduled for a further public hearing, until all of the issues raised in these comments, and in the comments of other members of the public and responsible agencies, have been addressed in a revised and recirculated EIR.

**Response i.1**: Comment i.1 provides a summary of more specific comments that are discussed below. A substantive response is provided below for each comment.

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### I. Statement of Interest

<u>Comment I.1:</u> Silicon Valley Residents is an unincorporated association of individuals and labor organizations that may be adversely affected by the potential public and worker health and safety hazards, and the environmental and public service impacts of the Project. Residents includes San Jose residents Christopher Valverde, Jonathan R. Baker, and Christopher Reed, the International Brotherhood of Electrical Workers Local 332, Plumbers & Steamfitters Local 393, Sheet Metal Workers Local 104, Sprinkler Fitters Local 483, along with their members, their families, and other individuals who live and work in the City of San Jose.

Individual members of Silicon Valley Residents live, work, recreate, and raise their families in the City and in the surrounding communities. Accordingly, they would be directly affected by the Project's environmental and health and safety impacts. Individual members may also work on the Project itself. They will be first in line to be exposed to any health and safety hazards that exist on site.

In addition, Silicon Valley Residents has an interest in enforcing environmental laws that encourage sustainable development and ensure a safe working environment for its members. Environmentally detrimental projects can jeopardize future jobs by making it more difficult and more expensive for businesses and industries to expand in the region, and by making the area less desirable for new businesses and new residents. Indeed, continued environmental degradation can, and has, caused construction moratoriums and other restrictions on growth that, in turn, reduce future employment opportunities.

**Response I.1:** Comment I.1 is a statement of interest in the environmental effects of the Cambrian Park project on behalf of the Silicon Valley Residents. The comment does not question the adequacy of the project's Environmental Impact Report (EIR). Therefore, no further response is warranted.

# II. Consideration of All Project Entitlements

<u>Comment II.1:</u> A Recommendation to Certify the EIR is Premature Given that All Project Entitlements have not yet been Considered by City Decision Makers. It is well-settled that certification or adoption of a CEQA document cannot be issued before a project has been approved. This is consistent with CEQA's requirement that an EIR consider the "whole of an action." This includes all phases of a project that are reasonably foreseeable. As the courts have held, "[t]he purpose of CEQA is to inform the public of plans, so that the public can help guide decision makers about environmental choices."

At this hearing, the Planning Commission will consider only two of Project's four discretionary entitlements – the annexation (Cambrian No. 37) and Planned Development Prezoning (PDC17-040). The City has scheduled the remaining entitlements (Planned Development Permit and Tentative Map) to be considered by the City decision makers after the annexation and Planned Development Zoning becomes effective. For that reason, a recommendation to approve the Project and certify the EIR would be premature at this time.

Future actions to be taken by City decision makers on the underlying Project approvals which are not currently before the Planning Commission may result in changes to the Project or the addition of new mitigation measures that must be evaluated and incorporated into the Project's EIR during the CEQA process. If the Planning Commission recommends certification of the FEIR prior to considering the remaining land use entitlements for the Project, the City Council's ability to ensure that all mitigation measures and alternatives are adequately considered in the Project's EIR will be limited. Therefore, the Planning Commission must not recommend that the City Council certify the FEIR pursuant to CEQA at this time given that the Project's remaining entitlements have not yet been considered or approved by the decision making body. Instead, the Planning Commission could recommend that the City Council consider the approval of the resolution certifying the FEIR at the same meeting where the tentative map and planned development permit(s) are considered.

**Response II.1:** This comment wrongly states that it is well settled that certification or adoption of a CEQA document cannot be issued before a project has been approved. This is contrary to the requirement of CEQA. The CEQA Guidelines Section 15090 states that the Lead Agency must certify the Final EIR before approving the project. The EIR evaluates the direct and reasonably foreseeable indirect physical changes that would be caused by the project based on the details of the project presented in the Planned Development Rezoning application filed with the City. The tentative map and Planned Development Permit are typically subsequent applications and serve to implement the Planned Development Rezoning. Prior to taking action to approve the tentative map and Planned Development Permit, the Planning Director would confirm that the environmental effects of the project, as represented in the detailed plans and information provided in the tentative map and Planned Development Permit, were in keeping with the EIR's analysis and conclusions. Any supplemental environmental analysis required for the tentative map and Planned Development Permit would be prepared pursuant to CEQA Guidelines Section 15162, which defines the conditions that trigger additional CEQA documentation due to the presence of 'new information' as defined in Section 15162. Therefore, it is not necessary for the tentative map and Planned Development Permit to be approved at the time the FEIR is certified.

# III. Responses to FEIR Comments – Air Quality, Noise, Transportation, Energy, and Water Supply

Comment III.1: CEQA requires that a lead agency evaluate and prepare written responses to comments in a FEIR. Agencies are required to provide "detailed written response to comments...to ensure that the lead agency will fully consider the environmental consequences of a decision before it is made, that the decision is well informed and open to public scrutiny, and the public participation in the environmental review process is meaningful." When a comment raises a "significant environmental issue," the written responses must describe the disposition of each such issue raised by commentators. Specifically, the lead agency must address the comment "in detail giving reasons why" the comment was "not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice," particularly in response to comments are made by experts. Failure of a lead agency to respond to comments raising significant environmental issues before approving a project frustrates CEQA's informational purpose and may render the EIR legally insufficient.

The City's responses to comments in the FEIR fail to fulfill the City's legal duty to provide reasoned and adequate responses.

**Response III.1:** The City of San José prepared adequate and thorough written responses to the public comments on the draft EIR that raised substantive issues. While the commenter disagrees with reasonableness and adequacy of the FEIR's responses, the City believes the FEIR's responses are appropriate, for the reasons provided in response to the detailed comments below.

Comment III.2: A. Responses to Comments on the Project's Significant and Unmitigated Construction Noise Impacts are Inadequate. A The RTC fails to meaningfully respond to noise expert Mr. Watry's comments addressing the failure to adequately analyze the Project's significant construction noise impacts and the deficient mitigation measures to reduce this impact to less than significant levels. Contrary to the analysis set forth in the DEIR and the noise analysis in Appendix G, the RTC now claims without sufficient evidentiary support that "since substantial construction generating activities such as grading, demolition, and excavation would move throughout the site and would not occur in one location for more than 12 months, substantial construction noise would not occur at a particular noise receptor or group of receptors for more than 12 months." According to Mr. Watry, "[t]he 12-month aspect is crucial to the FEIR's claim of the 'temporary' noise impact being less than significant and is called out 18 times in the responses to comments about construction noise."

Mr. Watry first responds to the RTC and FEIR's thresholds of significance for the Project's construction noise analysis. The FEIR included two criteria addressing construction noise impacts: (1) a significant impact would occur if a project located within 500 feet of residential uses would involve substantial noise- generating activities continuing for more than 12 months; and (2) an increase of 5 dBA Leq or more over the existing ambient and over 60 dBA Leq for more than 12 months at residences. For the first threshold of significance, Mr. Watry calculated that 79% of the 18.1-acre project site is within 500 feet of residences.

Additionally, based on the Project's construction timeline set forth in the FEIR, demolition activities, site preparation, grading, and trenching will occur over the initial eleven and a half months of Project construction to be followed by building construction. Based on the foregoing, Mr. Watry concluded that "construction noise from this project clearly meets the standard for a significant noise impact pursuant to General Plan Policy EC-1.7."

With regard to the second threshold, Mr. Watry reiterated his comments that 52 dBA is the existing daytime ambient noise level in the backyards of homes along Bercaw Lane, which are "precisely the area that construction noise will impact," according to Mr. Watry. The FEIR acknowledged, "The commenter has correctly summarized existing ambient noise levels at nearby receptors as presented in the noise assessment...." Nevertheless, the FEIR's Revised Noise Study relies on a 59 dBA Leq ambient daytime hourly average noise levels, which is based on a noise measurement taken on the street at the intersection of Bercaw Lane and Wyrick Avenue. Mr. Watry 's comments explain that the 52 dBA noise measurements taken near the backyards of the homes along Bercaw Lane are most representative of ambient noise levels because these are the locations where the sensitive receptors will be most affected by increased noise levels during construction. Mr. Watry's comments therefore

demonstrate that the City's reliance on an elevated 59 dBA L<sub>eq</sub> baseline noise level is unsupported because it is not representative of Project conditions. Mr. Watry's comments, by contrast, provide specific evidentiary support for utilizing 52 dBA as the existing daytime ambient noise level and he likewise provides support for his determination that the threshold of significance for this Project's noise impacts is an exceedance of 60 dBA L<sub>eq</sub> for a period of 12 months.

Based on the correct threshold, Mr. Watry's comments ultimately conclude that "[t]hroughout the first year, the noise levels in the backyards will regularly and routinely exceed both the existing ambient by 5 dBA and the absolute standard of 60 dBA. Therefore, the inescapable conclusion is that – even given the definition of 'temporary' as 12 months – the residents of Bercaw Lane will be significantly impacted by construction noise during that first year, at least."

In his response to the FEIR, Mr. Watry utilized the Revised Noise Study's mitigated noise level of 81 dBA L<sub>eq</sub> at 50 feet to calculate the noise level at other distances and concludes that noise levels remain significant after FEIR mitigation measures are applied.25 He determined that "[t]he distance at which the mitigated noise level is 60 dBA is 561 feet, even farther than the 500-foot distance presumed by Policy EC-1.7," and that around 85 percent of the Project site is within 561 feet of a residential property line.26 Moreover, around 66 percent of the Project site is within 561 feet of the Bercaw Lane residences.27 Mr. Watry explains that "[a]t 25 feet, the closest approach of construction work to the Bercaw Lane property lines, the noise level will be 87 dBA L<sub>eq</sub> which exceeds the 60 dBA standard by 27 dBA. These are mitigated noise levels."

See Figure 1 below generated by Mr. Watry, which shows that 85 percent of the Project is within 561 feet of residences (yellow) and 66 percent of the Project is within 561 feet of the Bercaw Lane residences (pink).



In terms of the duration of the Project's significant construction noise impacts, Mr. Watry's comments provide substantial evidence that even mitigated construction noise levels would exceed the thresholds for a period exceeding 12 months. Mr. Watry concludes that "[t]he activities that will primarily occur during the first year – demolition, site prep, grading, trenching, construction foundations – will occur across the site, and it is not reasonable to assert that equipment will not be routinely moving throughout 66% of the site for long durations."31 He also dismisses the RTC's claim that the construction of certain buildings will act as a noise barrier; "building construction will only have just begun in the last 2 weeks of the first year, so any shielding that may later be provided when the project residences nearest Berclaw are built cannot be claimed for the first year."

For the foregoing reasons, the RTC's responses to Mr. Watry's comments are not supported by substantial evidence and the FEIR still fails to establish that the Project's construction noise impacts—even with the proposed mitigation measures— will be less than significant. Mr. Watry's comments demonstrate that the Project will have significant impacts from construction noise levels and that the FEIR's existing mitigation is insufficient to reduce these impacts to less than significant levels. The analysis in the FEIR must be revised to accurately demonstrate the full extent of the Project's construction noise impacts.

**Response III.2:** The commenter calculated that 79 percent of the 18.1-acre project site is within 500 feet of residences (see Exhibit C of the Adams Broadwell letter, Wilson Ihrig Review and Comment on Response to DEIR Comments, Figure 1). Additionally, based on the Project's construction timeline set forth in the FEIR, demolition activities, site preparation, grading, and trenching will occur over the

initial eleven and a half months of Project construction to be followed by building construction (see Exhibit C of the , Figure 2). The commenter also argues that the baseline noise level of 59 dBA  $L_{eq}$  that was used in the analysis is unsupported (see Exhibit C, Figures 3 and 5).

Exhibit C of the Adams Broadwell letter, Figure 1 (Wilson Ihrig letter) shows a larger percentage of the site (within 500 feet of all of the residences along the eastern boundary of the site) as opposed to the percentage of the site undergoing construction that an individual residence would be exposed to. To illustrate this point, Figure A of this memorandum shows that the worst-case receptor would be subject to construction activities on approximately 52 percent of the site that would be within 500 feet. The land uses proposed within 500 feet of the worst-case receptor include townhomes, the community park, and about 75 percent of Building 3. The area does not include the largest buildings proposed on the site, which would be expected to generate most of the site's construction noise. Most of Buildings 1 and 2, approximately 28 townhomes, and approximately 25 percent of Building 3 would be outside of the 500 foot distance as measured from the individual worst-case receptor. Figure A graphically displays the portion of the project site within 500 feet of the worst-case receptor.



The project construction timeline shown in Exhibit C (Wilson Ihrig letter), Figure 2 implies that all construction activities (100 percent of the site) will occur within 500 feet of the worst-case receptor. Approximately 48 percent of the site, including most of the largest buildings proposed for the site, will be outside the 500 foot distance as measured from the worst-case receptor. Further, the commenter does not consider that approximately 40 percent of the overall construction duration will consist of interior finishing work, which generates substantially lower noise levels because the activities are indoors and require less heavy equipment.

The Section 3.12, Noise of the Draft EIR correctly identifies a potentially significant noise impact Per Policy EC-1.7 of the City's General Plan because the project would involve substantial noise generating activities continuing for more than 12 months. Mitigation, in the form of a construction noise logistics plan that specifies hours of construction, noise and vibration minimization measures, posting or notification of construction schedules, and designation of a noise disturbance coordinator who would respond to neighborhood complaints, and other measures to ensure noise does not exceed either of the City's thresholds for more than 12 months was required to reduce noise impacts on neighboring residents and other uses. A less than significant impact with mitigation finding was identified considering the project's compliance with General Plan Policy EC-1.7.

Exhibit C (of the Wilson Ihrig letter), Figure 3, shows the locations of the noise measurements made during the noise survey at Sites LT-1, LT-2, ST-2, and ST-4. The commenter states that the short-term noise measurements should be used to establish the ambient noise level. The ambient noise level is then used to establish the construction noise threshold (ambient noise level plus five (5) dBA).

The ambient noise level is defined as: "The composite of noise from all sources near and far and the normal or existing level of environmental noise at a given location." For the purposes of establishing an accurate ambient noise level, the long-term data collected at site LT-1 were used. The average daytime noise levels measured at LT-1 best represent daytime noise levels at nearby receptors throughout the course of the day. The daytime noise levels observed at LT-1, over the course of two days, were averaged and found to be 59 dBA Leq. The 64 dBA Leq threshold used to calculate the 350 foot impact distance is five (5) dBA above the ambient noise level of 59 dBA Leq.

The short-term measurement data collected at Sites ST-2 and ST-4 are not appropriate to establish ambient noise levels throughout a typical day. While the short-term measurements provide useful data regarding how quiet noise levels can be, these measurements are not comprehensive in that they are only a snapshot of noise levels during a 10-minute midday period. The short-term noise data typically represent the lowest daytime noise levels because they are taken with minimal influence of local noise sources. If a short-term noise measurement is interrupted by an atypical event such as a dog bark or motorcycle passby, then the data is discarded and the measurement is repeated. The 10-minute short-term data do not adequately

represent how noise levels fluctuate over longer periods of time such as a typical 8-hour construction workday. For an accurate representation of ambient noise levels, the long-term data must be relied upon.

Establishing a lower ambient noise level expands the zone where construction noise levels would exceed ambient levels by more than five (5) dBA. Utilizing the short-term data, the commenter calculated that construction noise levels would exceed the significance threshold within 561 feet of the worst case-receptor (see Exhibit C, Wilson Ihrig letter, Figure 5). Exhibit C, Figure 5 indicates that construction noise levels would exceed the ambient over 66 percent of the property that is within 561 feet of the worst-case receptor, and at 85 percent of the property that is within 561 feet of all the residences along the east boundary of the site.

When establishing ambient noise levels based on the long-term data, which is representative of typical residential noise exposures in the area and how the City has always determined ambient noise for the reasons stated above, a 350 foot impact zone is calculated. Figure B shows the 350 foot impact zone and that the worst-case receptor would be subject to excess noise from activities occurring on approximately 30 percent of the site. The land uses proposed in this particular area include approximately 28 townhomes and the community park, and about 10 percent of Building 3. The area does not include Buildings 1 and 2, about 90 percent of Building 3, and approximately 45 townhomes, which makes up most of the project site and associated construction activity.

In summary, over two-thirds of the project site would be developed outside of the 350 foot impact zone shown in Figure B. Most of the proposed construction activities would occur at Buildings 1-3 near the northwest corner of the site, which is typically 400 to 600 feet from the worst-case residence. Given the overall construction timeline of 28 months, and the requirements of the mitigation measure, it is reasonable to conclude that mitigated construction noise levels would not exceed the construction noise thresholds at individual noise sensitive land uses in the vicinity of the site. This is consistent with the conclusions of the construction analysis in the FEIR and no revisions to this analysis are required. To the extent that the comment provides expert opinion that disagrees with the expert opinion relied upon by the City in preparing the EIR, the CEQA Guideline Section 15151 explains that disagreement among experts does not make an EIR inadequate.



<u>Comment III.3:</u> B. Responses to Comments on the Projects Significant and Unmitigated Transportation Impacts are inadequate.

The RTC fails to meaningfully respond to transportation expert Mr. Daniel Smith's comments on the Project's VMT impacts.

First, Mr. Smith determined in his comments on the FEIR that the Project's 8.96 residential per capita VMT is approximately 24.8 percent below the VMT rate in the immediate area. For employment based VMT generation, the FEIR finds that the Project would generate VMT at a rate of 12.01 per employee, which is about 16.4 percent less than the rate of the broader area.<sup>34</sup> Mr. Smith concluded that "the EIR's estimated residential per capita VMT and employment-based VMT for the Project are implausible given that this Project, although mixed use, is of limited size and is sited in a highly suburbanized environment rather than in a dense urban area."

Mr. Smith explained that the analysis suggests two Project features that would reduce VMT: (1) closure of the existing vehicular access to the site at Wyrick Avenue, leaving just a pedestrian-only connection; and (2) creating new traffic signal protected crosswalks to the site, one across Union Avenue and one across Camden Avenue. The pedestrian enhancement measures would reduce about 0.625 percent of VMT, according to Mr. Smith based on the California Air Pollution Officers Association's published document entitled, "Quantifying Greenhouse Gas Mitigation Measures," which would "leave presumed internalization to account for the purported 24.18 percent balance of reduction in residential VMT per capita, which [Mr. Smith concludes] is not supported by evidence in the analysis." Mr. Smith therefore determined that "the predicted VMT per resident capita is unreliable."

Mr. Smith further stated that "the reduction in prevailing VMT per employee compared to prevailing average in the Project area would be dependent on an extremely high percentage of Project residents from a very small number of households to fill the jobs within the Project." Mr. Smith concluded that "[t]his assumption is implausible and not supported by evidence in the FEIR." He also noted that since the FEIR estimates approximately 730 jobs under the Office Variant but a mere 200 jobs under the Assisted Living Variant, "the two Variants would have different rates of VMT per employee because of different percentages of employees living internal to the Project." However, the FEIR's analysis assumed that the workforce in each case would generate the same average VMT per employee for both variants, which is another error in the analysis.

Second, Mr. Smith commented that the DEIR's assumption that the Project's hotel, retail, and restaurant uses would not generate net new trips because the Project would only attract existing trips made to hotel, retail, and restaurant sites around the Project area is speculative and unsupported. The RTC incorrectly described Mr. Smith's comments as focused on the City's methodology for assessing the VMT impacts of the Project. However, Mr. Smith's comments did not object to the City's selected methodology, but rather demonstrates that the underlying assumption made by the City and its consultants to analyze the VMT impacts from the Project's hotel, retail, and restaurant uses is unsubstantiated.

Mr. Smith explains in his comments on the FEIR that "each year the City and the region experience a growth in households and jobs. ... the Project's hotel/restaurant component is not just sharing in

serving a fixed demand but is providing capacity to serve a growing demand. As a result, the assumption of trip internalization in the FEIR's VMT evaluation approach is not supported by substantial evidence and skews the corresponding VMT impacts analysis for these uses against a realistic estimate of the VMT that the hotel, retail and restaurant components would generate."

Response III.3: Comments III.3, III.4, and III.5 were provided by Smith Engineering & Management attached to the Adams Broadwell letter in Exhibit B. The comment suggests that the results of the completed VMT analysis for the proposed residential and employment uses utilizing the City's adopted methodology of the proposed project are "unplausible" and "unreliable." The comment incorrectly references Citywide VMT baseline estimates as reference points for attempting to invalidate the projected VMT projections for the proposed project. However, the referenced Citywide baselines are immaterial in regard to the adopted methodology for evaluating VMT for development projects. Specifically, the adopted methodology evaluates a project's effects on VMT based on VMT baselines in the immediate project area. Therefore, the referenced Citywide baselines and percent reductions are immaterial to the adopted VMT analysis methodologies.

The proposed project will by its design include several improvements to non-vehicular travel within and surrounding the project site. The improvements, per the approved VMT analysis methodologies of Council Policy 5-1, are considered improvements to multi-modal travel and are anticipated to reduce VMT. The comment references methodologies and tools that are not used to complete VMT analysis in the City of San José The comment also suggests the results of the completed VMT analysis are unreliable based on presumptions and opinion that are not incorporated as part of the approved analysis methodology.

The referenced job numbers (730 jobs under the Office Variant and 200 jobs under the Assisted Living Variant) are not relevant to the completed VMT analysis. The adopted VMT methodology and the City's VMT tool utilizes proposed employment square footage, not projected jobs for specific site uses. The City's Transportation Demand Forecasting (TDF) model upon which the adopted VMT analysis is based, does utilize a general job conversion rate based on proposed square footage.

This comment and the Smith Engineering letter do not question whether the completed VMT analysis adequately applied the adopted City of San José methodologies utilized for the evaluation of VMT for proposed development projects. Rather the comment questions the results of projected VMT when utilizing VMT evaluation methodology that was approved as part of Council Policy 5-1. The completed analysis of VMT per capita and VMT per employee for the proposed project was completed in compliance with Council Policy 5-1, which is consistently used for all projects in the City to evaluate proposed development. The City's adopted VMT mitigation measures are based on statewide adopted CAPCOA studies. The VMT reduction taken for Increased Network Connectivity is based on the study from "Travel and the Built Environment – A Meta-Analysis" by Ewing, R., and Cervero, R. The VMT reduction taken for Pedestrian Network Improvements is based on the study from "Moving Cooler. An Analysis of Transportation Strategies for

Reducing Greenhouse Gas Emissions" by Cambridge Systematics. Based on formulas provided by both studies, the project's employment VMT for the Office Variant is reduced from 12.97 to 11.95 to be below the City's threshold of 12.21. Based on the formulas provided by both studies, the project's employment VMT for the Assisted Living Variant is reduced from 13.04 to 12.01, which is below the City's threshold of 12.21.

The CEQA guidelines state that the lead agency has the discretion to choose the most appropriate methodology to evaluate a project's effect on VMT. The methodology may consist of a qualitative analysis and professional judgement when models and adopted methods are not available to evaluate a particular project. There is no City adopted methodology for the evaluation of retail/commercial/hotel uses that are part of mixed-use development projects.. The comment references the site-specific uses and basis effects on VMT on presumptions of patronage and current trip making characteristics of city residents, customers, and workers. However, the evaluation of VMT for the proposed site uses must consider the wider project area. This methodology approach is consistent with the City's Urban Village concepts and goals that aim to change current travel behavior of residents in the future by developing a mix of uses in designated areas. Therefore, implementation of urban villages is assumed in the estimation of VMT for the proposed project that reflect changes to existing traffic patterns and trips as a result of the development of Urban Villages not only for the proposed project site but throughout the City. The VMT reductions that result from an increase in residential and employment density are based on CAPCOA studies adopted by the State and the City. The following are the sources used in the VMT Evaluation Tool adopted by the City for reductions: (i) Zhou, B. and K. M. Kockelman (2008); Transportation Research Record: Journal of the Transportation Research Board, Volume 2077: 54-61: Self-selection in home choice: use of treatment effects in evaluating relationship between built environment and travel behavior; (ii) Boarnet, Circella, Handy, Susan, and Boarnet, Marlon G. (2014); "Impacts of Employment Density on Passenger Vehicle Use and Greenhouse Gas Emissions"; and (iii) Salon, Deborah (2014); Quantifying the effect of local government actions on VMT; California Air Resources Board and the California Environmental Protection Agency. The increases in densities for employment and residential (and resulting VMT reductions) are based on formulas in both studies applied within the VMT Evaluation Tool (results are which shown in the appendix of the TA) rather than general assumptions. To the extent that the comment provides expert opinion that disagrees with the expert opinion relied upon by the City in preparing the EIR, the CEQA Guideline Section 15151 explains that disagreement among experts does not make an EIR inadequate.

<u>Comment III.4:</u> Third, Mr. Smith previously commented that "although the DEIR purports to assess cumulative impacts based on a list of approved but not yet developed projects within an approximate 2.5-mile radius of the Project site, two specific projects within that radius were not included in the cumulative projects list and that no projects within that radius but lying within the limits of the Town of Los Gatos were included." Response EE.48 explained in part that "No projects in the Town of Los Gatos were included in the cumulative LOS analysis given that there are no study intersections located in Los Gatos." Mr. Smith determined that Response EE.48 simply "evades the issue of

whether trips from approved projects in Los Gatos would travel through the locations that were studied in the FEIR and would thereby intensify the cumulative impacts of the Project."

However, Response EE.48 does admit that the 9395 S. Bascom and the 3090 S. Bascom approved developments were not considered in the cumulative analysis because each were estimated to not make traffic contributions exceeding 10 peak hour trips to any one of the DEIR study intersections. However, as Mr. Smith pointed out, "this 10 peak hour minimum trip standard does not appear in the City's Transportation Analysis Handbook, which defines ATI as 'A City-maintained database of vehicle-trips generated by projects for which an entitlement to build has been granted that have yet been built or occupied." Mr. Smith also commented that "[b]y ignoring projects of a certain size, the analysis ignores the fundamental purpose of a cumulative impacts analysis, which is to assess an impact created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." Mr. Smith also noted that comments by Ann Riddell identified additional development projects in the subject Project vicinity have not been included in the cumulative impacts analysis.

Response III.4: The City of San José contacted the City of Campbell, Town of Los Gatos, VTA, and Caltrans to comment on the project traffic scope and provide input on what to include in the project's traffic analysis, including any foreseeable pending/approved projects. No response was received from the Town of Los Gatos. Therefore, the City made a reasonable effort to identify future cumulative LOS conditions, and the traffic analysis for proposed project did not evaluate LOS effects associated with the Los Gatos North 40 project traffic on the City of San José roadway system. In addition, traffic associated with approved projects that are large enough to warrant the completion of their own individual traffic studies are included in the City's Approved Trips Inventory (ATI) which was used in the completed analysis. The referenced approved projects were deemed to either not require their own individual traffic studies and/or not result in the addition of measurable number of trips to intersections studied as part of the proposed project and included in the ATI for the study intersections. And lastly, traffic associated with approved/pending development within and outside of City limits is relevant for evaluation of future level of service at study intersections, but has no bearing on the CEQA (VMT) analysis. Therefore, the exclusion of traffic associated with the North 40 project and other referenced approved/pending projects has no effect on the CEQA VMT analysis, which is not based on LOS conditions. The requirement for the inclusion of a 10 peak hour minimum trip standard is found on page 39 of the City's Transportation Analysis Handbook. If a project contributes fewer than 10 peak hour trips, it is considered to have only a minimal has no effect on an LOS analysis.

<u>Comment III.5:</u> Fourth, Mr. Smith previously commented that the DEIR did not account for transportation impacts from the Project's proposed 18 Accessory Dwelling Units ("ADU"). Response EE.49 indicates the number of ADUs has been increased to 27 ADUs.<sup>54</sup> In response, Mr. Smith commented that "[t]he FEIR in its Appendix B presents a piecemeal sensitivity analysis of the VMT and traffic consequences of including the now proposed 27 ADUs. The FEIR improperly evaluates in isolation the consequence of just adding the 27 ADUs, but instead must also evaluate increased VMT and traffic from the missing cumulative projects noted above."<sup>55</sup>

Finally, Mr. Smith reiterated his comment that the "selection of competing services within the 5-mile radius circle of the Project site from which trips would be diverted is unrepresentative of the actual locations of competing facilities within that 5-mile radius." Mr. Smith states in his comments that no information was provided in the way of facts or arguments by the City in the RTC to change his analysis detailed in his comment letter on the DEIR.

The FEIR must be revised and recirculated to correct these deficiencies and errors in the analysis.

**Response III.5:** The comment incorrectly states that the 27 ADUs were evaluated in "isolation" of the remainder of the proposed residential units of the project. The referenced sensitivity analysis consisted of a re-evaluation of the 378 units evaluated in the transportation study along with the additional 27 ADUs. In addition, the sensitivity analysis also included the evaluation of an additional 50 independent senior living units associated with the proposed assisted living facility. Both the ADUs and senior units were evaluated as multi-family units. Therefore, the sensitivity analysis evaluated a combined total of 455 residential units in as indicted in Tables 1 and 2 of the sensitivity analysis memorandum (attached to Appendix B of the FEIR). The sensitivity analysis showed that the additional 27 ADUs and 50 independent senior units together with the rest of the project would not result in a VMT impact, would have no effect on LOS results, and would not lengthen the projected queues at intersections for either of the development alternatives.

# <u>Comment III.6:</u> C. Responses to Comments on the Project's Significant and Unmitigated Public Health Risks are Inadequate.

The RTC fails to meaningfully respond to SWAPE'S comments on the potentially significant public health risks associated with Project construction and operation, and fails to mitigate potentially significant health risk impacts. SWAPE previously commented that the Project's model was flawed because the Project's cancer risk was calculated based on Tier 4 Final equipment instead of the less stringent Tier 4 Interim equipment, which the Project proposes to use as mitigation. The RTC dismisses SWAPE's comments without adequate justification. Sepecifically, the RTC claims that Tier 4 Interim and Tier 4 Final equipment are equally effective in reducing particulate matter emissions. This assumption is incorrect. SWAPE's comments in response demonstrate that there are substantial differences in the emissions between Tier 4 Interim and Tier 4 Final equipment. SWAPE determined that "by correctly including Tier 4 Interim mitigation rather than Tier 4 Final mitigation, the revised model results in exhaust PM<sub>10</sub> emissions that are approximately 158% greater than the original emissions estimates." Given this significant discrepancy, SWAPE concluded that the DEIR's Health Risk Assessment ("HRA") "is underestimated, and the resulting cancer risk should not be relied upon to determine Project significance."

Additionally, the FEIR revised the DEIR air quality and health risk analysis to include a discussion of the Project's generators <sup>62</sup> The RTC explains that "the generator emissions of diesel particulate matter would increase cancer risk over the 30-year Project exposure period by 0.46 cases per million." In their comments on the FEIR, SWAPE "acknowledge[d] that this cancer risk, when combined with the cancer risk associated with Project construction and operation, would not change the less-than-significant health risk impact determination," but SWAPE determined that "in conjunction with the higher [Diesel Particulate Matter] emission rate and cancer risk that would

result from the less stringent Tier 4 Interim emissions standards, as discussed above, the Project may result in a significant health risk impact." Based on SWAPE's review and analysis, the FEIR fails to adequately evaluate, disclose, and mitigate the Project's potentially significant health risk impacts and the FEIR must be revised accordingly.

Response III.6: Comment III.6 is based on the SWAPE memo in Exhibit A of the Adams Broadwell comment letter. Section 3.3, of the Draft EIR construction emissions correctly reports the construction emissions (Table 3.3-5 of the Draft EIR) and evaluates the health risk impacts based on the minimum requirements that Tier 4 interim equipment be used. As stated in Response EE.7 of the FEIR, the results shown in the Draft EIR, Appendix B, Table 7, Page 23 for Alternative 1 are based on the use of equipment that meets Tier 4 interim standards and not Tier 4 Final. The CalEEMod mitigated output provided in Attachment 2 of Appendix B to the Draft EIR based on Tier 4 final equipment (based on a previous model run) was included in error. However, the correct construction emissions based on the use of Tier 4 interim equipment were reported in Section 3.3.2, Impact Discussion, Table 3.3-5, of the Draft EIR and Table 7 of the air quality analysis in Appendix B. The correct CalEEMod output based on Tier 4 interim equipment was included in Attachment A of the FEIR.

The Draft EIR reports unmitigated health risks that are based on construction modeling using unmitigated emissions from CalEEMod. Resulting health risks were found to be significant. Mitigation measure MM AIR-2 of the Draft EIR requires that on-site construction equipment meet U.S. EPA Tier 4 emission standards (i.e., Tier 4 Interim or final engine standard) for NOx and particulate matter. The CalEEMod modeling conducted to evaluate the effectiveness of MM AIR-2 was based on use of Tier 4 interim equipment. These mitigated results are shown in the Draft EIR and demonstrate that implementation of MM AIR-2 would reduce health risk impacts to a less than significant level. If equipment that meets Tier 4 final standards is used, then health risks would be lower than reported in the Draft EIR.

The commenter attempted to show that the difference in emissions between Tier 4 interim and Tier 4 final are substantial and, therefore, if Tier 4 interim equipment was assumed instead of Tier 4 final, emissions would be much higher. If the DEIR had reported mitigated risks based on Tier 4 final, mitigated health risks would be lower than reported. The commenter only compared controlled emissions from CalEEMod for Tier 4 final and Tier 4 interim. The Draft EIR is based on the Tier 4 interim emissions output (as stated above) by CalEEMod added to the emissions from EMFAC2017 for truck traffic provided in the FEIR.

To further clarify this point, the emission rates input to the construction health risk assessment are provided here as Appendix A to this memo. Total unmitigated emissions are 0.5839 tons of diesel particulate matter (DPM). With mitigation that includes the requirement of equipment that meets Tier 4 interim standards, total DPM emissions would be 0.0783 tons. This represents an 87 percent reduction in DPM emissions with implementation of MM AIR-2. With this reduction, cancer risk from construction is reduced from 69.58 chances per million to 7.14 chances per million,

which is below the threshold. With additional cancer risk caused by traffic and potential generators, the unmitigated risk would be 70.95 chances per million unmitigated, reduced to 8.51 chances per million with Draft EIR MM AIR-2 (Tier 4 interim equipment), which also is below the threshold.

The commenter only compares the on-site CalEEMod emissions from Tier 4 interim equipment with those of Tier 4 final and describes the differences. However, the Draft EIR only used construction equipment emissions for Tier 4 interim equipment and added those to the emissions from truck traffic predicted using EMFAC2017. A proper comparison would be as follows:

- Unmitigated DPM emissions = 0.5839 tons
- DEIR Mitigated DPM emissions (Tier 4 interim + trucks) = 0.0783 tons (87% reduction)
- DPM emissions (Tier 4 final + trucks) = 0.0477 tons (92% reduction)

While the commenter describes the differences between on-site construction equipment using Tier 4 interim and Tier 4 final as 158 percent, the difference is only five (5) percent when evaluating the reduction from unmitigated emissions and taking into account the contribution from trucks. Most importantly, mitigation measure MM AIR-2 that requires equipment with Tier 4 interim engines (as a minimum standard) is sufficient to reduce the construction emissions impact to a less than-significant level. To the extent that the comment provides expert opinion that disagrees with the expert opinion relied upon by the City in preparing the EIR, the CEQA Guideline Section 15151 explains that disagreement among experts does not make an EIR inadequate.

# **Comment III.7:** The FEIR Fails to Respond to Comments on the Project's Significant and Unmitigated Energy Impacts

We previously commented that the DEIR was inadequate as an environmental document because it failed to properly disclose, analyze, and mitigate the Project's significant impacts on energy use. Our comments identified a multitude of issues with the DEIR's impacts analysis on energy that were not adequately addressed in RTC.

First, the DEIR's energy impact analysis did not assume compliance with the City's requirements under the Reach Code and based the impacts analysis on a combination of electricity and natural gas usage. The FEIR failed to resolve this error. The failure to analyze the Project's energy impacts under the laws that the Project must comply with continues to be a substantial informational gap in the FEIR's analysis contrary to CEQA's requirements.

Second, the FEIR still lacks evidentiary support for the determination that the Project would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during operations. This information constitutes critical omissions that require analysis in a revised EIR.

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Cambrian Park Mixed-Use Village

City of San José

# a. The FEIR Must Disclose and Evaluate the Project's Actual Electricity Usage Based on Compliance with the City's Reach Code

The RTC Response EE.58 is non-responsive to our comment that the DEIR failed as an informational document because the energy impacts analysis "does not assume compliance with the City's Reach Code," and therefore the Project's actual electricity usage and impacts on energy and the environment is undisclosed. Response EE.58 again explains that "the project must comply with the City's Reach Code to obtain building permits," and "conformance with the City's Reach Code is evaluated prior to building permit issuance." However, this analysis must not be deferred until issuance of the Project's building permit. In order to comply with CEQA Appendix F energy analysis requirements, this information must be discussed in the EIR. Moreover, the Project's actual electricity usage in compliance with the City's Reach Code may result in significant impacts on energy supply that will be undisclosed and unmitigated if this analysis is delayed until issuance of the building permits.

Compliance with the City's Reach Code would increase the Project's electricity usage and may result in significant environmental impacts, such as from the effects on local and regional energy supplies, especially from SJCE's electricity supply, the effects on peak and base electricity demand, and compliance with existing energy standards. The FEIR must therefore be revised to evaluate the impacts on energy supply from the Project's actual electricity usage in compliance with the City's Reach Code. "The ultimate decision of whether to approve a project, be that decision right or wrong, is a nullity if based upon an EIR that does not provide the decision-makers, and the public, with the information about the project that is required by CEQA.' The error is prejudicial 'if the failure to include relevant information precludes informed decision-making and informed public participation, thereby thwarting the statutory goals of the EIR process."

Additionally, Response EE.58 states that "natural gas usage was assumed for the apartments, retail/restaurant, townhomes, and hotel uses in the model, making the Draft EIR's results conservative." However, by not assuming Reach Code compliance in the analysis, the FEIR impermissibly constrains the analysis of the Project's energy impacts to a combination of natural gas and electricity usage that is not permitted by law. The failure to disclose the Project's actual energy mix and usage in the FEIR constitutes a failure to proceed in the manner required by CEQA and is therefore an abuse of discretion. Thus, the FEIR must be revised to quantify and disclose the Project's electricity usage based on what is actually required by the City's policies and ordinances.

Response III.7: The first few paragraphs of the comment summarizes the commenter's concerns about the project's energy impacts as stated in their comments on the Draft EIR. The responses to these comments are included in this response and Responses III.9 and III.10 in this memorandum. The commenter states that the Draft EIR does not assume compliance with the City's Reach Code, and that the project's actual electricity usage and impacts on energy and the environment is undisclosed. As stated in Response EE.58 of the Final EIR, the project would be required to comply with the Reach Code and therefore, the Draft EIR analysis provides a conservative estimate of the project's energy usage by disclosing the potential use of natural gas in some buildings (shown in Table 3.6-3, Page 110 of the Draft EIR). The CalEEMod modeling used in the Draft EIR was completed prior to the City's adoption of the current Title 24 Reach Codes that electrify most new residential and commercial

developments. Therefore, the Draft EIR based its analysis on regulations in place at the time of modeling energy usage, and included a mix of natural gas and electric powered sources.

In response to this comment, the CalEEMod modeling was adjusted to reflect the current San José Reach Code by converting the previously assumed natural gas usage into electricity usage in all residential and commercial uses, except for the commercial kitchen uses (which may use natural gas). Commercial kitchen uses include the kitchen for the congregate care assisted living use, high-turnover restaurant use, and the kitchen for the hotel use The revisions that reflect the correct electricity output in Section 3.6, Energy of the Draft EIR (in compliance with the Reach Code) are included in Section 2.0, Draft EIR Text Revisions, of this memo. The correct modeling output data is also included in Appendix A of this memo. As shown in revised Table 3.6-3 in Section 2.0 below, factoring in the latest Reach Code, implementation of the Assisted Living Variant would increase electricity use on-site by approximately 6.6 million kWh per year (versus 6.4 million kWh per year under the Draft EIR's assumption for natural gas usage), and natural gas usage by approximately 9.7 million kBtu per year (versus 20.5 million kBtu per year under the Draft EIR's assumption for natural gas usage). Therefore, assuming the updated Reach Code, the Assisted Living Variant electricity demand increases by 0.2 million kWh per year (three percent), while natural gas usage would only be 47 percent of what was disclosed in the Draft EIR.

As shown in revised Table 3.6-4 in Section 2.0 below, factoring in the latest Reach Code, implementation of the Office Variant would increase electricity use on-site by approximately 8.7 million kWh per year (versus 8.5 million kWh per year under the Draft EIR's assumption for natural gas usage) and natural gas usage by approximately 9.2 million kBtu per year (versus 21.6 million kBtu per year under the Draft EIR's assumption for natural gas usage). Therefore, assuming the updated Reach Code, the Office Variant electricity demand increases by 0.2 million kWh per year (two percent), while natural gas usage would only be 43 percent of what was disclosed in the Draft EIR. These updated demand values for both the Assisted Living and Office Variants do not substantially alter the Draft EIR's conclusions regarding the project's effects on energy supplies. As discussed in the Draft EIR, 3.6, Energy, SJCE has capacity to supply the increase in demand for electricity, under both project variants, without the need to construct unplanned facilities. The project would not use energy in a wasteful or inefficient manner because it would use energy resources to respond to existing demand and in a way that would result in energyefficient buildings. The new buildings that meet current code reduce energy per capita use compared to the existing buildings on-site.

<u>Comment III.8:</u> b. The FEIR Lacks Substantial Evidence to Demonstrate that the Project Would Not Result in a Significant Environmental Impact Due to Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

CEQA Guidelines Appendix F identifies the following means to achieve the goal of conserving energy: decreasing overall per capita energy consumption, decreasing reliance on fossil fuels, and

increasing reliance on renewable energy sources. In order to ensure that energy impacts are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects and a detailed statement of mitigation measures designed to "minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."

RTC Response EE.59 fails to support the determination that "[t]he EIR's analysis demonstrates that the project would not result in a wasteful use of energy,...." First, the FEIR fails to adequately analyze the significance of the Project's energy impacts given the Project's reliance on fossil fuels. One of the stated goals in Appendix F is to decrease reliance on fossil fuels. The FEIR, however, estimates that implementation of the Assisted Living Variant would increase natural gas usage by approximately 20.5 million kBtu per year and implementation of the Office Variant would increase natural gas usage by approximately 21.6 million kBtu per year. Response EE.59 wholly ignores the Project's natural gas usage estimated in the FEIR and instead reiterates that the Project would comply with the City's Reach Code. However, the energy supply analysis admittedly does not assume compliance with the Reach Code and calculates natural gas usage for Project features such as the apartments, townhouses, hotel, strip mall, restaurant, and assisted living facility/office space. Based on the energy use calculations in the FEIR, the Project would increase reliance on fossil fuels that may result in an undisclosed potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources.

Second, as explained above, the energy impacts analysis should have considered the Project's actual electricity usage in compliance with the City's Reach Code to analyze the environmental impacts. CEQA Guidelines section 15126.2 states that the energy impacts analysis "shall focus on energy use that is caused by the project." Appendix F establishes that potential energy impacts could arise from the project's effects on local and regional energy supplies, requirements for additional capacity, peak and base period demands for electricity, and the project's effects on energy resources. By failing to disclose the Project's actual electricity usage consistent with the Reach Code, the FEIR fails to analyze the energy impacts caused by the Project, and it remains unknown if additional natural gas usage may be necessary to supply energy for the Project. As a result, the analysis in the FEIR fails to comply with the requirements set forth in Appendix F.

Response III.8: As stated in Response III.7, and Responses EE.58 and EE.59 in the FEIR, the project would be consistent with the Reach Code and would use 100 percent carbon free electricity for the apartment, office, retail, townhomes, assisted living facility, and hotel uses. Some natural gas usage was assumed for commercial kitchens for the assisted living facility, hotel, and restaurant uses (as allowed by the Reach Code). CalEEMod (which models energy output and GHG emissions) was rerun to account for the project's compliance with the Reach Code. As discussed in the prior response, and as shown in revised Tables 3.6-3 and 3.6-4 of Section 2.0 Draft EIR Text Revisions below, as a result of the project being subject to the latest Reach Code, natural gas usage would increase by 9.7 million kBtu for the assisted living variant and 8.7 million kBtu for the office variant, while the Draft EIR had conservatively disclosed they would be 20.5 million kBtu and 21.6 million kBtu, respectively. For the reasons stated in Section 3.6, Energy of the Draft and because the project would comply with the Reach Code, energy use for the project is not

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wasteful or inefficient and compliance with the Reach Code reduces reliance on natural gas, consistent with statement in CEQA Guidelines Appendix F .

Comment III.9: Third, another stated goal for conserving energy set forth in Appendix F is "increasing reliance on renewable energy sources." Appendix F further states that "Mitigation Measures may include: ... 4. Alternate fuels (particularly renewable ones) or energy systems." In line with Appendix F, the San Jose 2030 Greenhouse Gas Reduction Strategy includes a Green Building Measure and Design Feature to "[e]ncourage maximized use of on-site generation of renewable energy for all new and existing buildings," and "[e]ncourage the installation of solar panels or other clean energy power generation sources over parking areas."

Response EE.59 states that "[t]he project proposes to install solar panels on all low-rise residences units and will make taller mixed-use and commercial buildings solar ready. In addition, the project anticipates that there will be solar on the mixed-use commercial/residential building." However, "solar ready" and "anticipate[d]" solar does not ensure an increase in the reliance on renewable energy systems, as required by Appendix F. This discussion of renewable energy generation is vague and uncertain, and fails to provide a meaningful "investigation into renewable energy options that might be available or appropriate for the project."

Moreover, although "[t]he Project's use of on-site solar will decrease the need to pull energy from the grid," "electricity for the Project would [also] be provided by SJCE,...." The FEIR, however, does not disclose the Project's actual electricity usage and also fails to assess how much electricity would be needed from the grid as compared to the energy generated by on-site renewable energy sources. Response EE.59 wrongly asserts that "Appendix F of the CEQA Guidelines does not require a discussion of how much electricity would be needed from the grid as compared to the energy generated by on-site renewable energy source." However, Appendix F lists possible energy impacts and mitigation measures for the lead agency to consider, which include the project's energy requirements; the project's effects on local and regional energy supplies, requirements for additional capacity, and peak and base period demands for electricity and other forms of energy; the degree to which the project complies with existing energy standards; and the project's effects on energy resources. The FEIR must be revised and recirculated to adequately disclose proposed renewable energy generation for the Project and sufficiently analyze the related energy impacts.

Finally, compliance with the Building Code and other energy efficiency requirements does not, by itself, constitute an adequate assessment of measures that can be taken to address the energy impacts during construction and operation of the Project. In *Ukiah Citizens for Safety First v. City of Ukiah*, the court held that the EIR inadequately described the energy impacts of a Costco project where the EIR relied on the project's compliance with energy conservation standards to conclude that energy consumption would be less than significant, and did not separately evaluate energy impacts from transportation, construction, or operation. Here, the FEIR relies on the California Building Code and Title 24 energy efficiency standards, CALGreen code, green building practices, and a number of green building measures and design features, consistent with the San José 2030 Greenhouse Gas Reduction Strategy to support the less than significant determination. However, as described above, additional analysis is necessary under the requirements of Appendix F to support a determination that the Project would not result in the wasteful, inefficient, and unnecessary consumption of energy during construction and operations.

Therefore, for several reasons, the FEIR fails to comply with Appendix F energy analysis requirements and must be revised.

**Response III.9:** As stated in FEIR Response EE.59, the project proposes to install solar panels on all low-rise residences units and will make the commercial buildings solar ready. In addition, the project anticipates that there will be solar on the mixed-use commercial/residential building. Given that the commercial buildings are not fully designed, solar paneling on the commercial buildings cannot be determined at this time as the space available for solar paneling will not be known until the builds are fully designed. Accordingly, to be conservative and avoid speculation, the EIR assumes that the commercial building would not have solar.

As stated in Responses III.7 and III.8, the energy calculations have been updated in Tables 3.6-3 and 3.6-4 in the Draft EIR (see Section 2.0 Draft EIR Text Revisions) to account for the project's compliance with the Reach Code (which results in an increase in electricity usage and decrease in natural gas usage). As discussed above in Response III.8, implementing the Reach Code would serve to substantially decrease (by roughly half) natural gas usage in the project, electricity usage would be approximately 3% greater for the Assisted Living Variant and 2.3 percent greater for the Office Variant, than disclosed in the EIR. However, for buildings without solar sufficient to offset use, the project would comply with the City's Reach Code by using 100 percent carbon free electricity (i.e., for the project's commercial uses (with the exception of natural gas usage allowed for commercial kitchens under the Reach Code)). Section 3.6, Energy of the Draft EIR and the FEIR evaluate energy impacts and the site's on-site renewable energy, consistent with Appendix F in the CEQA Guidelines, therefore, the Draft EIR and FEIR do not require recirculation.

The FEIR did not solely rely on the project's compliance with California Building Code and Title 24 energy efficiency standards, CALGreen code, green building practices, or other green building measures to conclude that the project's energy consumption would be less than significant. The Draft EIR and Final EIR discussed measures that would be implemented during construction to reduce energy such as restricting idling times for construction equipment (refer to Response EE.60 in the FEIR). Additionally, the project would be required to divert 75 percent of construction and demolition waste in accordance with Municipal Code Section 9.10.2480. Diverting waste from the landfill and salvaging for reuse would reduce energy waste during the construction process. In addition, as discussed above, the project responds to existing demand, for housing, commercial, and office, therefore making the construction necessary rather than wasteful, and redeveloping infill locations provides construction efficiencies that are not available at outlying greenfield sites because urban infrastructure already exists.

The project would also implement operational measures such as a Transportation Demand Management (TDM) Plan that would reduce VMT and related fuel consumption (refer to Response EE.59).

The Draft EIR and FEIR comply with CEQA Guidelines Appendix F. The Final EIR's analyses demonstrates that the project would not result in a wasteful use of energy (from construction and operations), and the comment does not undermine the EIR's substantial evidence that the project would not result in wasteful or inefficient use of energy by the project.

# Comment III.10: E. The FEIR Fails to Adequately Response to Comments on the Project's Potentially Significant and Unmitigated Impacts on Water Supply

The RTC fails to adequately respond to our comments that the DEIR lacks substantial evidence to support the conclusion that the Project would not result in significant impacts to water supplies.

We commented that the DEIR fails to adequately identify and analyze the conservation measures that would purportedly reduce future water demand during single-dry water year and multiple dry years given that total water demand during these periods is estimated to exceed the total supply. RTC Response EE.55 states that "the set of conservation measures may change with successive UWMPs based on a variety of factors, and so it is not possible to precisely predict what specific conservation measures may be implemented in future drought conditions by the SJWC." However, in response to the Santa Clara Valley Water District's comments dated January 3, 2022 recommending the implementation of water conservation measures, Response A.8 recognizes that "the project as proposed already includes several water conservation measures," including drought-tolerant plant species, high efficiency irrigation systems, weather-based irrigation controllers, dedicated irrigation water meters, individual water meters for single- family homes and townhouses, and submeters for retail/commercial spaces and multi-family units. If, in fact, the Project will incorporate these measures to reduce the Project's water usage, the FEIR must disclose these measures, along with any additional measures, and incorporate the measures as formal mitigation or conditions of approval to ensure adoption.

> **Response III.10:** As stated in Response A.8 of the FEIR, the project would include water conservation measures, including weather-based irrigation controllers and dedicated irrigation water meters. The project would include individual water meters for the single-family houses and townhome units and submeters for retail/commercial spaces and multi-family units, and hot water circulation systems.

> As discussed in Response E.55 of the FEIR, the project occupants would employ additional feasible, effective water conservation measures spelled out in the San José Water Company (SJWC) Urban Water Management Plan. By law, the UWMP is updated every five years, and the set of conservation measures may change with successive UWMPs based on a variety of factors. The above-mentioned water conservation measures will be incorporated as a part of the project and identified as conditions of approval. These conservation measures have been added to the Draft EIR text (see Section 2.0 of this memorandum).

August 2022

City of San José

# <u>Comment III.11:</u> IV. The Project is Inconsistent with Signature Project Policy IP-5.10 and Cannot be Approved Prior to Adoption of Urban Village Plan

The Project proponent intends to develop the site as a Signature Project, which allows a mixed-use project with residential uses on commercially designated properties within an Urban Village if the project either (1) meets the criteria outlined in General Plan Policy IP-5.10 to qualify as a Signature Project, or b) if an Urban Village Plan is adopted which allows residential development on commercial- designated sites. The site is located in an Urban Village Area without an adopted Urban Village Plan and thus the Project must meet the criteria set forth under Policy IP-5.10.

Policy IP-5.10 allows non-residential development to proceed within Urban Village areas in advance of the preparation of an Urban Village Plan. In addition, a residential, mixed-use "Signature" project may also proceed ahead of preparation of a Village Plan. A residential, mixed-use Signature project may proceed within Urban Village areas in advance of the preparation of an Urban Village Plan if it fully meets the following requirements:

- 1. Within the Urban Village areas, Signature projects are appropriate on sites with an Urban Village, residential, or commercial Land Use / Transportation Diagram designation.
- 2. Incorporates job growth capacity above the average density of jobs/acre planned for the developable portions of the entire Village Planning area and, for portions of a Signature project that include housing, those portions incorporate housing density at or above the average density of dwelling units per acre planned for the entire Village Planning area.
- 3. Is located at a visible, prominent location within the Village so that it can be an example for, but not impose obstacles to, subsequent other development within the Village area.

Additionally, a proposed Signature project will be reviewed for **substantial conformance** with the following objectives:

- 1. Includes public parklands and/or privately maintained, publicly accessible plazas or open space areas
- 2. Achieves the pedestrian friendly design guideline objectives identified within this Envision San José 2040 General Plan.
- 3. Is planned and designed through a process that provided a substantive opportunity for input by interested community members.
- 4. Demonstrates high-quality architectural, landscape and site design features.
- 5. Is consistent with the recommendations of the City's Urban Design Review process or equivalent recommending process if the project is subject to review by such a process.

The Project fails to satisfy all of the findings required by Policy IP-5.10 because the Project will not incorporate job growth capacity above the average density of jobs/acre planned for the developable portions of the entire Village Planning area. The Staff Report states that "[t]he project is required to generate approximately 910 new jobs. The project, with 349,310 square feet of commercial space, meets this criterion and provides for the creation of approximately 1,165 new jobs." To the contrary, the DEIR concluded that the Project would add "up to approximately 200 jobs (assuming one worker per 300 square feet of commercial/retail space provided) under the Assisted Living Variant and approximately 730 jobs under the Office Variant," both of which are substantially less than the required 910 new jobs. <sup>100</sup> The DEIR also calculated that the "Assisted Living Variant ... would result

in a total of 176 employees," and "[t]he Office Variant ... would .... Create approximately 709 jobs." The FEIR retains the DEIR's conclusions on these issues. Thus, the job creation estimations proposed under either Project scenario are substantially less than the required 910 new jobs pursuant to Policy IP-5.10, and the Staff Report lacks evidentiary support for its new and inflated commercial square footage and job creation calculation.

Accordingly, the requirements under Policy IP-5.10 have not been satisfied and the Project must not be approved as a Signature Project.

Response III.11: The proposed project meets the General Plan Policy IP-5.10 criteria for a signature project. A Signature Project incorporates job growth capacity above the average density of jobs/acre planned for the developable portions of the entire village planning area and, for portions of a signature project that include housing, those portions incorporate housing density at or above average density of dwelling units per acre planned for the entire village planning area. The determination of whether a project meets General Plan Policy IP-5.10's job growth capacity is based on the commercial square footage it supplies rather than actual employees it may generate. Based on the project site area, the existing commercial area to be demolished, and the planned job capacity of the Urban Village Plan per Appendix 5 of the General Plan, the development must provide more than 272,565 square feet of commercial area per Policy IP-5.10. The project, with 342,470 square feet of commercial space for the assisted living variant and 376,730 square feet for the office variant, meets this criterion of a Signature Project. The City's formula for converting commercial space to jobs for Signature Projects is 1 employee per 300 square feet regardless of the type of commercial space. Using this formula, the City determined that the project is required to generate approximately 910 new jobs and provides for the creation of approximately 1,165 new jobs for the assisted living variant and 1,256 jobs for the office variant, in conformance with the Signature Project requirements.

As stated in the Staff Report prepared for the Planning Commission in July 2022 for the Cambrian Park project (Cambrian No. 37, PDC17-040 and ER20-189), Page 112 of the Draft EIR, and Section 2.0, Draft EIR text revisions, the project is assumed to have one employee per 300 square feet for commercial space for determining conformance with the Signature Project policy. As discussed in Response III.3, the referenced job numbers are not relevant to the completed VMT analysis. The City's TDF model upon which the adopted VMT analysis is based, does utilize a general job conversion rate based on proposed square footage. The job ratio used in the VMT Evaluation tool based on statewide studies is a consistent rate used across all development projects. Therefore, a change in the number of jobs proposed would not affect the VMT analysis. As explained above, to determine consistency with the Signature Project Policy, the City does not take into consideration actual number of jobs, and instead considers the square footage of commercial space using a 1 job per 300 square foot ratio per the General Plan to estimate job growth capacity. Stated differently, the 1,165 jobs calculated by City Staff for the assisted living variant and 1,256 jobs calculated for the office variant to determine conformance with the Urban Village Signature Project requirement takes into consideration the job growth capacity based on square footage of commercial, not exact land use type. Therefore,

for the purpose of determining Signature Project conformance, the assisted living variant would both produce an estimated 1,165 job growth capacity. Text changes have been made in the Section 3.6, Energy and Section 3.13, Population and Housing to show the proposed number of jobs (1,165 jobs for the assisted living variant and 1,256 jobs for the office variant) calculated by City staff used for the purpose of determining Signature Project conformance. This change does not require revisions to any other sections of the EIR. The change in the number of jobs does not affect the conclusions in the Final EIR or Draft EIR analyses.

# **Comment III.12:** V. The Findings Required by State Law to Approve the Annexation Proposal Cannot be Made

In adopting a resolution approving the annexation proposal, state law requires the City Council to make the following finding, among others: "...[t]hat the proposal is consistent with the adopted general plan of the city." This finding cannot be made for this Project for several reasons and the Planning Commission must therefore recommend denial of the annexation proposal to the City Council.

# A. The Project is Inconsistent with General Plan Policies for Recycled Water and On-site Water Reuse

In the RTC, the City claims that the Project site is too far from the nearest recycled water line and "it is not feasible to obtain recycled water on the project site at this time." The annexation proposal will therefore not support the location of new development within the vicinity of a recycled water system, as encouraged by Policy MS-17.2.

Policy MS-19.1 requires new development to contribute to the cost-effective expansion of the recycled water system in proportion to the extent that it receives benefit from the local water supply. The Project's total water usage is estimated at 352.5 acre-feet per year as compared to 9.1 acre-feet per year used by the existing development. The annexation of these lands for new development will therefore be benefited by local, potable water resources, yet there is no requirement to contribute to the cost-effective expansion of the recycled water system.

Policy MS-18.12 encourages, when feasible and cost effective, on-site rainwater catchment for new and existing development. There is no analysis of the feasibility to install on-site rainwater catchment despite that the annexation will result in a significant increase in potable water usage on site. The failure to incorporate water reuse green building practices is also inconsistent with Policy MS-1.2, which is focused on increasing the number of buildings within the City that make use of green building practices by incorporating those practices into new construction.

It should also be noted that the Santa Clara Valley Water District submitted comments dated November 23, 2020 that recommended a host of measures to reduce or avoid adverse impacts to water supply.107 Specifically, the District explained that "[r]e-development of the site provides opportunities to minimize water and associated energy use by using recycled water, incorporating onsite reuse for both storm and graywater, and requiring water conservation measures above State standards (i.e., CALGreen). To reduce or avoid adverse impacts to water supply, the City and applicant should consider the following: ...

- The installation of dual plumbing to facilitate and maximize the use of alternative water sources for irrigation, toilet flushing, cooling towers, and other non-potable water uses should recycled water lines be adjacent to the site or potentially extended in the future to serve the site. In addition, onsite reuse of water may be appropriate now or in the future.
- Maximize the use of alternative water sources for non-potable uses including stormwater, rainwater, and graywater..."

Implementation of water reuse measures would provide for greater consistency with the General Plan policies, yet as currently proposed, the Project is inconsistent with these policies and the findings to approve the annexation proposal cannot be made.

**Response III.12:** As stated in Responses EE.53 and EE.56 in the Final EIR, the nearest recycled water line to the project site is located near Curtner Avenue and Little Orchard Street, approximately 4.25 miles northeast of the project site. The project site would need to be within 300 feet of a recycled water line for the project to access recycled water. The project would not be located in the vicinity of a recycled water system. Therefore, it is not feasible for the proposed project to use recycled water.

Neither the South Bay Recycling Water Program (SBWP) nor other known recycled water retailers have plans to expand recycled water lines in the project vicinity. As the project is not within 300 feet of an existing recycled water line, and there are no current planned expansions into the area, the SBWP would not pursue project contributions.

Since it is not feasible to obtain recycled water on the project site at this time or foreseeable future, the project will not be dual plumbed. As stated in Response EE.55 in the Final EIR, based on information in the Santa Clara Valley Urban Runoff Pollution Prevention Program. C.3 Stormwater Handbook, to make gray water or stormwater harvesting for irrigation use feasible for a site in San José that uses water conscious landscaping, the landscape area would need to be 5.1 times the size of the impervious area. The proposed project, being an urban redevelopment, does not meet this requirement. Therefore, stormwater and gray water would not be used for irrigation.

The City only requires implementation of the above General Plan policies and recommended Valley Water measures if they are feasible for the project. In addition, a Water Supply Assessment (Appendix I of the Draft EIR) was prepared for the project, which confirms there is sufficient water available to serve the site. Therefore, the project would result in a less than significant impact to water supply, under CEQA.

# **Comment III.13:** V.B. The Project is Inconsistent with General Plan Policies Governing Transit

Policy FS-4.7 encourages transit-oriented development as a means to reduce costs for expansion and maintenance of the City's streets, in addition to other benefits and consistent with the General Plan Transportation goals and policies. The proposed annexed site is in a Commercial Corridor and Center Urban Village, which the General Plan describes as being "less directly connected to transit than other Growth Areas," and "recogniz[es] that transit-oriented sites should be given more priority for accommodating new growth."

The site proposed to be annexed is also located approximately two miles from the closest Light Rail along Winchester Boulevard, north of Camden Avenue and five Valley Transportation Authority bus lines serve the site. Policy TR-3.8 requires collaboration with transit providers to develop and provide transit stop amenities such as pedestrian pathways approaching stops, benches and shelters, nighttime lighting, traveler information systems, and bike storage to facilitate access to and from transit stops. These measures encourage ridership. The Staff Report acknowledges that "VTA has been made aware of the request for additional service at this area," and that "[t]he project is being conditioned to coordinate with VTA to provide bus stop improvements and duck-outs. ... to provide a 21-foot wide sidewalk along the Camden Avenue project frontage and a 19-foot wide sidewalk along the Union Avenue project frontage." Although these conditions will add some transit amenities to the area, greater effort is needed to demonstrate consistency with Policy TR-3.8, especially with regards to the light rail stop.

**Response III.13:** As the commenter notes, the Project in in a Commercial Corridor and Center Urban Village. According to the General Plan, "Commercial Corridor and Center Urban Villages are planned to take advantage of the redevelopment potential for existing, underutilized commercial sites. These sites usually have some access to transit, but were identified primarily because of their redevelopment potential. These larger regional commercial center Urban Villages will function as complete destinations that integrate a mix of high density housing, employment, and services within existing key business areas to create dynamic urban settings. These commercial center Urban Villages will serve a much larger area than the immediately adjacent surrounding neighborhoods." As the General Plan notes, "Providing residential growth capacity in the Commercial Growth Areas is a potential catalyst to spur the redevelopment and enhancement of existing commercial uses while also transforming them into mixed-use Urban Village type environments." Camden Avenue and Union Avenue already are served by transit. Redevelopment in the Urban Village area that includes the project site will encourage increased transit service to the area.

As stated in Appendix H, sidewalks would continue to be provided along the project site frontage on Camden Avenue and Union Avenue, connecting the project site to existing pedestrian facilities and destinations outside of the project site, including the bus stops on Camden and Union Avenues. As stated in the above comment, the project applicant will coordinate with VTA to provide bus stop improvements and duck-outs. The project is consistent with General Plan Policy TR-3.8 as the project applicant will coordinate with VTA (transit provider) to develop transit stop

amenities (such as sidewalks and bus stop improvements). Improvements to a light rail stop is not required under this policy. Therefore, since the project meets the policy requirements, the City is not requiring the project to implement additional transit stop amenities.

# **Comment III.14:** V.C. The Project is Inconsistent with General Plan Policy MS-13.3 to Reduce Grading

Finally, Policy MS-13.3 requires subdivision designs and site planning to minimize grading yet approximately 400,000 cubic yards of soil is proposed be exported for this Project.111 A Reduced Grading and Excavation Alternative was evaluated in the EIR to reduce construction air quality impacts but was nevertheless dismissed, despite the reduced amount of grading and excavation than the proposed Project.

For the foregoing reasons, the Planning Commission must recommend denial of the annexation proposal.

Response III.14: Project excavation and grading would not result in significant and unavoidable environmental impacts. The impacts of the project's construction air pollutant emissions and construction noise would be reduced to less than significant with the implementation of mitigation measures (refer to Draft EIR, Section 3.3, Air Quality and 3.12, Noise). As stated in the Draft EIR, Section 7.0, Alternatives, the Reduced Grading and Excavation Alternative would diminish the opportunity to intensify job-creating commercial and office growth within the Camden Avenue/Hillsdale Avenue Urban Village growth area. This would make the Alternative inconsistent with the City's General Plan goals related to taking full advantage of infill development opportunities within Urban Village areas. As discussed in CEQA Guidelines Section 15091, since the project's impacts are reduced to less than significant levels with the implementation of mitigation measures, it is not required for the City to make findings to reject the project alternatives. Therefore, the Planning Commission did not recommend denial of the annexation proposal.

Further, the Project is consistent with the General Plan when considered as a whole. The Project complies with policies such as Policy MS-3.5 ("minimize areas dedicated to surface parking to reduce rainwater that comes into contact with pollutants") and VN-1.9 ("cluster parking, make use of shared parking facilities, and minimize the visual impact of surface parking lots to the degree possible to promote pedestrian and bicycle activity and to improve the City's aesthetic environment") by placing the majority of parking underground. The compliance with these policies must be balanced with policies that encourage the reduction of grading. As the General Plan states, "users should realize that the policies throughout all elements are interrelated and should be examined comprehensively. They must be considered together when making planning decisions." The Planning Commission and City Council are the appropriate decision-making bodies to strike the appropriate balance between policies and determine how they can best be accomplished when examined comprehensively.

# <u>Comment III.15:</u> VI. The Findings Required by the Subdivision Map Act Cannot be Made for the Project's Tentative Map

The annexation and pre-zoning are associated with a Planned Development Permit, File No. PD20-007, and a Vesting Tentative Map, File No. PT21-007.113 These two applications will be heard separately after the annexation has been certified by the Local Agency Formation Commission of Santa Clara County. <sup>114</sup> For purposes of CEQA compliance, the Staff Report explains that the FEIR was prepared for all of the separate discretionary actions and planning activities associated with entitlement and development of the Project site. <sup>115</sup> As such, it is timely to also comment on the required findings for the Project's proposed tentative map.

A tentative map for any subdivision must not be approved unless the proposed subdivision, together with the provisions for its design and improvement, is consistent with the applicable general and specific plans of the City.116 A tentative map of any subdivision must be disapproved if any of the findings described in Section 66474 of the Subdivision Map Act are made.117 Specifically, a tentative map must be denied if any of the following findings can be made: "(a) That the proposed map is not consistent with applicable general and specific plans as specified in Section 65451. (b) That the design or improvement of the proposed subdivision is not consistent with applicable general and specific plans. (c) That the site is not physically suitable for the type of development. (d) That the site is not physically suitable for the proposed density of development. (e) That the design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat. (f) That the design of the subdivision or type of improvements is likely to cause serious public health problems. ...."

As a result of the Project's ongoing unmitigated significant impacts discussed above, the findings required under state and City laws to approve the Project's tentative map are not supported by substantial evidence. In particular, the findings necessary to approve the tentative map pursuant to the Subdivision Map Act - specifically, the findings that the proposed map is consistent with the General Plan, that the Project is not likely to cause substantial environmental damage, and that the Project will not result in serious public health problems - are not supported by substantial evidence for the reasons set forth in Sections III and V herein.

Per the Vesting Tentative Map Findings referenced in Comment III.15, the project is consistent with the General Plan goals, policies, and land use designation, as analyzed within the staff report. The project site is physically suitable for the project and proposed intensity in that the project is consistent with the Signature Project policy of the General Plan which requires a minimum of 30 dwelling units per acre and the provision of at least 272,565 square feet of commercial space; and the project plans illustrate how these minimums are achieved while meeting city standards for access, internal circulation and required heights and setbacks in accordance with the Planned Development Zoning of the property. Furthermore, the project site does not contain historic resources or sensitive habitats or wildlife. The project site does not provide a natural habitat for either fish or wildlife. The proposed subdivision and subsequent improvements are not likely to cause serious public health problems in that no significant unavoidable environmental impacts have been identified for the project, including air quality and noise impacts. Furthermore, the site is not located within a designated Federal Emergency Management Agency (FEMA) 100-year flood plain.

The subdivision design does not conflict with any public easements recorded on the property as identified in the title report for the property or shown on the tentative map.

The Draft EIR and Final EIR evaluate the project's environmental impacts of the project. All significant impacts identified in the EIR would be reduced to less than significant levels with the implementation of mitigation. The impacts to public health from project construction and operational emissions were evaluated in Section 3.3, Air Quality and would be mitigated (e.g., by requiring the use of Tier 4 Interim Equipment). The EIR also evaluated potential impacts of hazardous materials contamination on the public and environment in Section 3.9, Hazards and Hazardous Materials. Mitigation such as implementation of a Soil Management Plan would reduce these impacts to less than significant. The identified impacts would be reduced to less than significant and the findings were supported by substantial evidence.

# **Comment III.16:** VII. Conclusion

For the reasons stated herein and in the attached comments by technical experts, Silicon Valley Residents urges the Planning Commission to not recommend that the City Council certify the FEIR, pre-zone the site, and initiate annexation proceedings. In the alternative, Silicon Valley Residents urges the Planning Commission to direct Staff to prepare and circulate a legally adequate EIR which fully analyzes the environmental impacts of all the Project's required entitlements and mitigates the Project's significant impacts to public health, noise, transportation, energy use, and water supply.

The City must remedy all substantial defects in the FEIR, and in the Project as a whole, before the Project may be presented to the City's decision making body at any future public hearing.

Response III.16: For the reasons stated in the responses above, the EIR analysis adequately evaluates the project's environmental impacts including impacts to public health (e.g., air quality impacts), noise-receptors, transportation, energy use, and water supply. The minor updates to the project's electricity usage and reduction in natural usage (in accordance with the Reach Code) are included in this memorandum (see Section 2.0 Draft EIR Text Revisions). These revisions do not change the conclusions of the Draft EIR or FEIR and no other substantive changes, based on the comments on the Final EIR, are required for the Draft EIR or FEIR. The DEIR and FEIR fully analyze the environmental impacts of the entirety of the Project, including all required entitlements, therefore recirculation of the EIR is not required.

# SECTION 2.0 DRAFT EIR TEXT REVISIONS

This section contains revisions to the text of the Cambrian Park Mixed Use Village project Draft EIR dated November 2021. Revised or new language is <u>underlined</u>. All deletions are shown with a <del>line through the text</del>.

Page 20 Section .2.2, Proposed Project; the following text will be **ADDED** after the second paragraph:

# Water Conservation Measures

The project would include water conservation measures such as drought-tolerant plant species and high efficiency irrigation systems. The project would include individual water meters for the single-family houses and townhome units and submeters for retail/commercial spaces and multi-family units, and hot water circulation systems.

Pages 110-111 Section 3.6.2, Impact Discussion; Tables 3.6-3 and 3.6-4 and text will be **REVISED** as follows:

Table 3.6-3: Assisted Living Variant Annual Energy Demand						
Land Use	Electricity (kWh)	Natural Gas (kBtu)				
Apartments Mid Rise – 320 units	<del>1,321,070</del> <u>1,321,880</u>	<del>2,764,620</del> <u>0</u>				
City Park – 2.26 acres	0	0				
Townhouses – 25 units	<del>126,136</del> <u>126,273</u>	468,075 <u>0</u>				
Assisted Living – 185 beds	<del>763,745</del> <u>764,043</u>	<del>1,598,300</del> - <u>583,675</u>				
Hotel – 230 rooms	<del>1,262,940</del> <u>1,264,600</u>	<del>7,343,940</del> <u>787,265</u>				
Single-Family Housing – 49 units (incl. 18 ADUs)	<del>396,438</del> <u>396,854</u>	0				
ADUs – 27 units	218,845 <sup>a</sup>	<u>0</u>				
Strip Mall – 18,000 square feet	192,420	42,660				
Sit Down Restaurant – 42,000 square feet	1,374,240	8,730,960				
Enclosed Parking with Elevator - 1,225 spaces	2,871,400	0				
Parking Lot – 98 spaces	13,720	0				
Total:	<u>8,544,275</u> <u>8,322,109</u>	<u>10,101,900</u> <u>20,948,555</u>				
Existing Development	1,928,820	403,912				
Increase:	<u>6,615,455</u>	<u>9,697,988</u> <u>20,544,643</u>				

Source: Illingworth & Rodkin, Inc. Cambrian Park Plaza Air Quality and Greenhouse Gas Emission Assessment. <u>April 2021 September 18, 2020</u>.

<sup>&</sup>lt;sup>a</sup> Note that the electricity for 27 ADUs is conservative since these were modeled as single-family houses. The electricity usage for the ADUs would be less than the modeled estimate.

As shown in Table 3.6-3 above, implementation of the Assisted Living Variant would increase electricity use on-site by approximately 6.64 million kWh per year and natural gas usage by approximately 9.7 20.5 million kBtu per year.

<b>Table 3.6-4:</b>	Table 3.6-4: Office Variant Annual Energy Demand						
Land Use	Electricity (kWh)	Natural Gas (kBtu)					
Apartments Mid Rise – 320 units	<del>1,321,070</del> <u>1,321,880</u>	<del>2,764,620</del> <u>0</u>					
City Park – 2.26 acres	0	0					
Townhouses – 25 units	<del>126,136</del> <u>126,273</u>	4 <del>68,075</del> <u>0</u>					
Office – 160,000 square feet	2,852,800	<del>2,619,200</del> <u>0</u>					
Hotel – 230 rooms	<del>1,262,940</del> <u>1,264,600</u>	<del>7,343,940</del> - <u>787,265</u>					
Single-Family Housing – 49 units	<del>396,438</del> <u>396,854</u>	0					
ADUs – 27 units	218,845 <sup>a</sup>	0					
Strip Mall – 18,000 square feet	192,420	42,660					
Sit Down Restaurant – 42,000 square feet	1,374,240	8,730,960					
Enclosed Parking with Elevator – 1,225 spaces	2,871,400	0					
Parking Lot – 98 spaces	13,720	0					
Total:	10,633,032 10,411,164	<del>21,969,455</del> - <u>9,560,885</u>					
Existing Development	1,928,820	403,912					
Increase:	<u>8,704,212</u>	<u>9,156,973</u> <u>21,565,543</u>					

Source: Illingworth & Rodkin, Inc. Cambrian Park Plaza Air Quality and Greenhouse Gas Emission Assessment. <u>April 2021 September 18, 2020</u>.

As shown in Table 3.6-4, implementation of the Office Variant would increase electricity use on-site by approximately 8.75-million kWh per year and natural gas usage by approximately 9.2 21.6 million kBtu per year.

Pages 112-113 Section 3.6.2, Impact Discussion; the text in the last paragraph of Page 12 will be **REVISED** as follows:

The project is a mixed-use development that would create housing and jobs in a city that currently has a higher number of employed residents than jobs (approximately 0.8 jobs per employed resident). The implications of this imbalance are that many residents leave San José five times per week to commute to and from work, typically by personal vehicle. By adding 455394 units of additional housing (includes 428 standard units and 27 ADUs) in the City and up to approximately 200 1,165 jobs (assuming one worker per 300 square feet of commercial/retail space provided) under the Assisted Living Variant and approximately 1,256 730 jobs under the Office Variant, the proposed project would incrementally decrease the imbalance between jobs and employed residents.

Page 202 Section 3.13.2, Impact Discussion, Checklist Question a); the second and third paragraphs will be **REVISED** as follows:

<sup>&</sup>lt;sup>a</sup> Note that the electricity for 27 ADUs is conservative since these were modeled as single-family houses. The electricity usage for the ADUs would be less than the modeled estimate.

The proposed project would result in a net increase in housing citywide of approximately <u>428</u>394 new housing units. Additionally, the Assisted Living Variant proposes a 110-bed assisted living facility. Assuming a rate of 3.19 persons per household <u>for the apartments, townhomes, and single-family houses, and-one</u> resident per bed in the assisted living facility <u>and one resident per senior unit, and two residents per ADU</u>, the project would result in 1,42042 new residents. The Assisted Living Variant also proposes a 230-room hotel, 18,000 square feet of retail, and 42,000 square feet of restaurant space. The San José Employment Density and FAR Assumptions by Land Use Type rates were used to estimate the number of jobs created under the Assisted Living Variant. Based on the commercial rate of <u>one employee per 300 square feet retail rate of 250 gross (square feet per employee and the hotel and restaurant rate of 2,000 gross square feet per employee, the proposed commercial uses would result in a total of <u>1,165 176</u> employees. The Office Variant would replace the 11085-bed <u>and 50 independent senior unit</u> assisted living facility with 160,000 square feet of office space. Using the Traditional Office Space rate of 300 gross square feet per employee, the office uses under the Office Variant would generate 533 employees. In total, the Office Variant would place approximately <u>1,260 1,257</u> residents on-site and create approximately <u>1,256 jobs</u>.</u>

The project would develop land already planned for job and housing growth in the Envision San José 2040 General Plan. The project is located in the Camden/Hillsdale Urban Village, which has a growth capacity of 2,000 jobs and 450 560 residential units upon full build-out of the General Plan.

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<sup>&</sup>lt;sup>1</sup> The project is within the Camden/Hillsdale Urban Village Plan area identified in the General Plan; however, the Urban Village Plan has not yet been adopted. The proposed project meets the criteria of a signature project, as defined by the City of San José, since it includes residential and commercial space within an Urban Village.

<sup>2</sup> City of San José. *Envision San José 2040 General Plan*. Adopted November 1, 2011. As amended March 16, 2020. Appendix 5 – Planned Job Capacity and Housing Growth Areas by Horizon.

<a href="https://www.sanjoseca.gov/home/showdocument?id=22359">https://www.sanjoseca.gov/home/showdocument?id=22359</a>

# APPENDIX A Air Quality Data

Attachment A: DEIR Construction Health Risk Assessment Emissions (excerpts from Attachment 4 of the DEIR Appendix B)

# **PROJECT CONSTRUCTION HRA**

# Cambrian Park Plaza, San Jose, CA

# **DPM Construction Emissions and Modeling Emission Rates**

								Emissions
								per
Construction		DPM	Source	No.	ı	DPM Emissio	ns	Point Source
Year	Activity	(ton/year)	Туре	Sources	(lb/yr)	(lb/hr)	(g/s)	(g/s)
2021	Construction	0.1801	Point	112	360.3	0.09871	1.24E-02	1.11E-04
2022	Construction	0.2228	Point	112	445.7	0.12211	1.54E-02	1.37E-04
2023	Construction	0.1809	Point	112	361.9	0.09915	1.25E-02	1.12E-04
Total		0.5839		336	1168	0.3200		

**Construction Hours** 

hr/day = 10 (7am-5pm)

days/yr = 365hours/year = 3650

**PM2.5 Fugitive Construction Emissions and Modeling Emission Rates** 

Construction		Area		PM2.5 Er	nissions		Modeled Area	Emission Rate
Year	Activity	Source	(ton/year)	(lb/yr)	(lb/hr)	(g/s)	(m²)	g/s/m <sup>2</sup>
2021	Construction	FUG	0.4226	845.3	0.23158	2.92E-02	69,654	4.19E-07
2022	Construction	FUG	0.2026	405.1	0.11100	1.40E-02	69,654	2.01E-07
2023	Construction	FUG	0.0040	7.9	0.00217	2.73E-04	69,654	3.92E-09
Total			0.6292	1258	0.3447	0.0434		

Construction Hours

hr/day = 10 (7am-5pm)

days/yr = 365hours/year = 3650

# DPM Construction Emissions and Modeling Emission Rates - With Mitigation

						U		
Construction		DPM	Source	No.		DPM Emissio	ons	Emissions per Point Source
				•				_
Year	Activity	(ton/year)	Type	Sources	(lb/yr)	(lb/hr)	(g/s)	(g/s)
2021	Construction	0.0100	Point	112	19.9	0.00545	6.87E-04	6.14E-06
2022	Construction	0.0286	Point	112	57.3	0.01569	1.98E-03	1.77E-05
2023	Construction	0.0397	Point	112	79.5	0.02178	2.74E-03	2.45E-05
Total		0.0783		336	157	0.0429		

**Construction Hours** 

hr/day = 10 (7am-5pm)

days/yr = 365

hours/year = 3650

# PM2.5 Fugitive Construction Emissions and Modeling Emission Rates - With Mitigation

							Modeled	Emission
Construction		Area		PM2.5 Er	nissions		Area	Rate
Year	Activity	Source	(ton/year)	(lb/yr)	(lb/hr)	(g/s)	(m²)	g/s/m <sup>2</sup>
2021	Construction	FUG	0.0838	167.7	0.04594	5.79E-03	69,654	8.31E-08
2022	Construction	FUG	0.0432	86.3	0.02366	2.98E-03	69,654	4.28E-08
2023	Construction	FUG	0.0040	7.9	0.00217	2.73E-04	69,654	3.92E-09
Total			0.1310	261.9	0.0718	0.0090		

**Construction Hours** 

hr/day = 10 (7am-5pm)

days/yr = 365hours/year = 3650

# Project: Cambrian Park Plaza, San Jose, CA

ject.	Cumbrian Fact 1024, Sun 103C, CA							
			D	PΝ	Л			
	Unmitigated	DPM	Unmitigated		Mitigated	DPM	Mitigated	
	DPM	EMFAC2017	Emissions		DPM	EMFAC2017	Emissions	
2021	0.177	0.003	0.180		0.007	0.003	0.010	
2022	0.215	0.008	0.223		0.021	0.008	0.029	
2023	0.175	0.006	0.181		0.0333	0.006	0.040	
			Fugitiv	e I	PM2.5			
	Unmitigated	Fug PM2.5	Unmitigated		Mitigated	Fug PM2.5	Mitigated	
	Fug PM2.5	EMFAC2017	Emissions		Fug PM2.5	EMFAC2017	Emissions	
2021	0.42090	0.002	0.423		0.082	0.002	0.084	
2022	0.19800	0.005	0.203		0.039	0.005	0.043	
2023	0.00000	0.004	0.004		0.000	0.004	0.004	

Attachment B: Updated CalEEMod Modeling of Project Operation (assuming electrification of natural gas appliances)

Date: 7/18/2022 10:41 AM

Cambrian Park Plaza - AQ/GHG Model - Santa Clara County, Annual

## Cambrian Park Plaza - AQ/GHG Model Alternative 1 Santa Clara County, Annual

#### 1.0 Project Characteristics

#### 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Enclosed Parking with Elevator	1,225.00	Space	0.00	490,000.00	0
Other Non-Asphalt Surfaces	319.47	1000sqft	0.00	319,470.00	0
Parking Lot	98.00	Space	0.00	39,200.00	0
City Park	2.26	Acre	2.26	98,445.60	0
High Turnover (Sit Down Restaurant)	42.00	1000sqft	0.00	42,000.00	0
Hotel	230.00	Room	0.00	165,740.00	0
Apartments Mid Rise	320.00	Dwelling Unit	14.94	340,220.00	915
Condo/Townhouse	25.00	Dwelling Unit	0.00	49,350.00	72
Congregate Care (Assisted Living)	185.00	Dwelling Unit	0.00	160,000.00	529
Single Family Housing	49.00	Dwelling Unit	0.00	113,620.00	140
Strip Mall	18.00	1000sqft	0.00	18,000.00	0

#### 1.2 Other Project Characteristics

Urbanization Urban Wind Speed (m/s) 22 Precipitation Freq (Days) 58 Climate Zone Operational Year 2024

Utility Company Pacific Gas & Electric Company

CO2 Intensity **CH4 Intensity** 0.029 **N2O Intensity** 0.006 (lb/MWhr)

(lb/MWhr) (lb/MWhr)

#### 1.3 User Entered Comments & Non-Default Data

Project Characteristics - Project in San Jose. PG&E 2017 Intensity Factor used (latest published rate).

Land Use - Alternative 1 with the assisted living land use. Using plan square footages for the residential land uses and the hardscape/landscape coverage. Site Area is 18.2 acres

Construction Phase - Using total workdays from project applicant 9.8.2020

Off-road Equipment - Project Applicant Equipment List 9.8.2020

Trips and VMT - Post-model computation with EMFAC2017

Demolition - Demo 171,205 sf of building and haul 500,000 sf of existing pavement

Grading - Export 400,000 cubic yards of soil

Vehicle Trips - Alternative 1 Project Trip Generation Estimates. Community Open Space would not generate trips. Using project specific traffic rates

Vehicle Emission Factors - 2024 EMFAC2017 Santa Clara County Emission Factors

Vehicle Emission Factors -

Vehicle Emission Factors -

Woodstoves - No woodstoves or hearths (wood or natural gas)

Energy Use - SJ Reach Code - All electric for residential and commercial uses, natural gas use for potential kitchens in assisted living, hotel and retail in nontitle 24

Water And Wastewater - 100% percent aerobic since it is assumed that water goes through wastewater treament plants

Construction Off-road Equipment Mitigation - Advanced best management practices, Tier 4 interim for exhaust mitigation

Energy Mitigation - SJCE is the electricity provider in San Jose. Will provide 100% carbon free electricity from 2021 on

Fleet Mix - EMFAC2017

Table Name	Column Name	Default Value	New Value
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	0.55		
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tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	15.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	5.00
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tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	6.00
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tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	12.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	26.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	3.00
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tblConstEquipMitigation		-	Tier 4 Interim
	Tier	No Change	
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
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tblEnergyUse	T24E	249.32	253.88
tblEnergyUse	T24E	332.81	334.42
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		3.75	0.00
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th Off Dood Equipment	OffDoodEquipment  InitAmount	2.00	7.00
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	<u> </u>		
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tblVehicleEF	LDA	1.5950e-003	1.2960e-003
tblVehicleEF	LDA	2.2180e-003	1.6800e-003
tblVehicleEF	LDA	1.4690e-003	1.1940e-003
tblVehicleEF	LDA	2.0400e-003	1.5440e-003
tblVehicleEF	LDA	0.03	0.04
tblVehicleEF	LDA	0.08	0.08
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	7.6460e-003	6.4160e-003
tblVehicleEF	LDA	0.04	0.20
tblVehicleEF	LDA	0.06	0.19
tblVehicleEF	LDA	2.2460e-003	9.3000e-005
tblVehicleEF	LDA	5.4600e-004	0.00
tblVehicleEF	LDA	0.03	0.04
tblVehicleEF	LDA	0.08	0.08
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	0.01	9.3280e-003
tblVehicleEF	LDA	0.04	0.20
tblVehicleEF	LDA	0.06	0.21
tblVehicleEF	LDT1	6.9850e-003	3.6010e-003
tblVehicleEF	LDT1	9.7160e-003	0.06
tblVehicleEF	LDT1	0.91	0.85
tblVehicleEF	LDT1	2.05	2.27
tblVehicleEF	LDT1	281.97	286.67
tblVehicleEF	LDT1	66.03	61.55
tblVehicleEF	LDT1	0.09	0.07
tblVehicleEF	LDT1	0.11	0.21
tblVehicleEF	LDT1	2.1030e-003	1.6460e-003
tblVehicleEF	LDT1	2.8260e-003	2.1080e-003
tblVehicleEF	LDT1	1.9360e-003	1.5150e-003
tblVehicleEF	LDT1	2.5980e-003	1.9380e-003
tblVehicleEF	LDT1	0.07	0.07

tblVehicleEF	LDT1	0.19	0.15
tblVehicleEF	LDT1	0.06	0.15
tblVehicleEF	LDT1	0.02	0.02
tblVehicleEF	LDT1	0.14	0.54
tblVehicleEF	LDT1	0.13	0.27
tblVehicleEF	LDT1	2.8300e-003	2.6190e-003
tblVehicleEF	LDT1	6.9600e-004	0.00
tblVehicleEF	LDT1	0.07	0.07
tblVehicleEF	LDT1	0.19	0.15
tblVehicleEF	LDT1	0.06	0.06
tblVehicleEF	LDT1	0.03	0.02
tblVehicleEF	LDT1	0.14	0.54
tblVehicleEF	LDT1	0.14	0.30
tblVehicleEF	LDT2	4.5890e-003	2.9320e-003
tblVehicleEF	LDT2	5.7820e-003	0.06
tblVehicleEF	LDT2	0.65	0.74
tblVehicleEF	LDT2	1.32	2.70
tblVehicleEF	LDT2	319.72	308.00
tblVehicleEF	LDT2	74.64	66.71
tblVehicleEF	LDT2	0.06	0.06
tblVehicleEF	LDT2	0.09	0.25
tblVehicleEF	LDT2	1.6510e-003	1.3470e-003
tblVehicleEF	LDT2	2.3140e-003	1.7010e-003
tblVehicleEF	LDT2	1.5190e-003	1.2400e-003
tblVehicleEF	LDT2	2.1270e-003	1.5640e-003
tblVehicleEF	LDT2	0.04	0.06
tblVehicleEF	LDT2	0.10	0.12
tblVehicleEF	LDT2	0.04	0.06
tblVehicleEF	LDT2	0.01	0.01
tblVehicleEF	LDT2	0.07	0.41
tblVehicleEF	LDT2	0.08	0.28
tblVehicleEF	LDT2	3.2020e-003	0.01
tblVehicleEF	LDT2	7.6800e-004	9.1000e-005
tblVehicleEF	LDT2	0.04	0.06
tblVehicleEF	LDT2	0.10	0.12
			0.06
tblVehicleEF	LDT2	0.04	
tblVehicleEF	LDT2	0.02	0.02
tblVehicleEF	LDT2	0.07	0.41
tblVehicleEF	LDT2	0.09	0.31
tblVehicleEF	LHD1	5.1130e-003	4.9880e-003
tblVehicleEF	LHD1	0.02	7.8580e-003
tblVehicleEF	LHD1	0.02	0.01
tblVehicleEF	LHD1	0.15	0.18
tblVehicleEF	LHD1	0.94	0.71
tblVehicleEF	LHD1	2.42	1.05
tblVehicleEF	LHD1	8.98	8.86
tblVehicleEF	LHD1	679.88	779.34
tblVehicleEF	LHD1	31.45	11.55
tblVehicleEF	LHD1	0.07	0.06
tblVehicleEF	LHD1	1.00	0.65
tblVehicleEF	LHD1	0.94	0.30
tblVehicleEF	LHD1	8.5700e-004	8.4200e-004
tblVehicleEF	LHD1	0.01	9.7790e-003
tblVehicleEF	LHD1	0.01	9.6230e-003
tblVehicleEF	LHD1	9.0500e-004	2.4700e-004
tblVehicleEF	LHD1	8.2000e-004	8.0500e-004
			2.4450e-003
tblVehicleEF	LHD1	2.5360e-003	2.44306-003

tblVehicleEF	LHD1	8.3200e-004	2.2800e-004
tblVehicleEF	LHD1	2.5370e-003	1.9120e-003
tblVehicleEF	LHD1	0.10	0.07
tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.3080e-003	9.8500e-004
tblVehicleEF	LHD1	0.12	0.09
tblVehicleEF	LHD1	0.32	0.50
tblVehicleEF		0.24	0.07
tblVehicleEF	LHD1	9.0000e-005	8.6000e-005
tblVehicleEF	LHD1	6.6680e-003	7.6080e-003
tblVehicleEF	LHD1	3.6000e-004	1.1400e-004
tblVehicleEF	LHD1	2.5370e-003	1.9120e-003
tblVehicleEF	LHD1	0.10	0.07
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	1.3080e-003	9.8500e-004
tblVehicleEF	LHD1	0.14	0.11
tblVehicleEF	LHD1	0.32	0.50
tblVehicleEF	LHD1	0.26	0.08
tblVehicleEF	LHD2	3.1970e-003	3.0380e-003
tblVehicleEF	LHD2	7.0200e-003	6.6540e-003
tblVehicleEF	LHD2	5.9370e-003	7.7290e-003
tblVehicleEF	LHD2	0.12	0.14
tblVehicleEF	LHD2	0.53	0.59
tblVehicleEF	LHD2	1.09	0.60
tblVehicleEF	LHD2	13.93	13.88
tblVehicleEF	LHD2	699.69	754.92
tblVehicleEF	LHD2	23.61	7.59
tblVehicleEF	LHD2	0.09	0.09
tblVehicleEF	LHD2	0.59	0.77
tblVehicleEF	LHD2	0.41	0.17
tblVehicleEF	LHD2	1.2120e-003	1.4370e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	4.0000e-004	1.2700e-004
tblVehicleEF	LHD2	1.1590e-003	1.3750e-003
tblVehicleEF	LHD2	2.6950e-003	2.6920e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	3.6800e-004	1.1700e-004
tblVehicleEF	LHD2	7.4700e-004	9.8500e-004
tblVehicleEF	LHD2	0.03	0.04
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	4.0800e-004	5.1400e-004
tblVehicleEF	LHD2	0.10	0.11
tblVehicleEF	LHD2	0.06	0.25
tblVehicleEF	LHD2	0.08	0.23
tblVehicleEF	LHD2	1.3600e-004	1.3300e-004
		6.8030e-003	
tblVehicleEF	LHD2		7.2890e-003
tblVehicleEF	LHD2	2.5500e-004	7.5000e-005
tbl//ehicleEF	LHD2	7.4700e-004	9.8500e-004
tblVehicleEF	LHD2	0.03	0.04
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	4.0800e-004	5.1400e-004
tblVehicleEF	LHD2	0.12	0.13
tblVehicleEF	LHD2	0.06	0.25
tblVehicleEF	LHD2	0.09	0.04
tblVehicleEF	MCY	0.45	0.33
tblVehicleEF	MCY	0.16	0.25
tblVehicleEF	MCY	18.47	18.60

tblVehicleEF	MCY	10.21	9.06
tblVehicleEF	MCY	170.05	210.08
tblVehicleEF	MCY	44.74	60.71
tblVehicleEF	MCY	1.14	1.15
tblVehicleEF	MCY	0.32	0.27
		2.0290e-003	
tblVehicleEF	MCY		1.9970e-003
tblVehicleEF	MCY	3.5220e-003	2.9300e-003
tblVehicleEF	MCY	1.8960e-003	1.8650e-003
tblVehicleEF	MCY	3.3110e-003	2.7520e-003
tblVehicleEF	MCY	0.90	1.80
tblVehicleEF	MCY	0.68	0.68
tblVehicleEF	MCY	0.49	0.98
tblVehicleEF	MCY	2.18	2.19
tblVehicleEF	MCY	0.58	1.89
tblVehicleEF	MCY	2.18	1.93
tblVehicleEF	MCY	2.0670e-003	2.0790e-003
tblVehicleEF	MCY	6.7900e-004	6.0100e-004
tblVehicleEF	MCY	0.90	1.80
tblVehicleEF	MCY	0.68	0.68
tblVehicleEF	MCY	0.49	0.98
tblVehicleEF	MCY	2.71	2.72
tblVehicleEF			
<u></u>	MCY	0.58	1.89
tblVehicleEF	MCY	2.38	2.10
tblVehicleEF	MDV	8.4590e-003	3.4000e-003
tblVehicleEF	MDV	0.01	0.07
tblVehicleEF	MDV	0.97	0.78
tblVehicleEF	MDV	2.43	2.96
tblVehicleEF	MDV	429.38	372.42
tblVehicleEF	MDV	98.57	79.53
tblVehicleEF	MDV	0.12	0.07
tblVehicleEF	MDV	0.21	0.29
tblVehicleEF	MDV	1.7680e-003	1.4380e-003
tblVehicleEF	MDV	2.4430e-003	1.8100e-003
tblVehicleEF	MDV	1.6290e-003	1.3260e-003
tblVehicleEF	MDV	2.2460e-003	1.6640e-003
tblVehicleEF	MDV	0.06	0.07
tblVehicleEF	MDV	0.16	0.13
tblVehicleEF	MDV	0.06	0.07
tblVehicleEF	MDV	0.02	0.01
tblVehicleEF	MDV	0.10	0.43
tblVehicleEF	MDV	0.18	0.34
tblVehicleEF	MDV	4.2980e-003	3.6060e-003
tblVehicleEF	MDV	1.0280e-003	7.7100e-004
tblVehicleEF	MDV	0.06	0.07
tblVehicleEF	MDV	0.16	0.13
tblVehicleEF	MDV	0.06	0.07
tblVehicleEF	MDV	0.03	0.02
tblVehicleEF	MDV	0.10	0.43
tblVehicleEF	MDV	0.20	0.38
tblVehicleEF	MH	0.02	
			9.5570e-003
tblVehicleEF	MH	0.02	0.02
tblVehicleEF	MH	1.61	0.93
tblVehicleEF	MH	5.16	2.03
tblVehicleEF	MH	1,207.03	1,501.42
tblVehicleEF	MH	58.43	18.14
tblVehicleEF	MH	1.20	1.31
tblVehicleEF	MH	0.77	0.24
tblVehicleEF	MH	0.01	0.01

tblVehicleEF	MH	0.02	0.02
tblVehicleEF	MH	1.0680e-003	2.6100e-004
tblVehicleEF	 MH	3.2200e-003	3.2790e-003
tblVehicleEF	MH	0.02	0.02
tblVehicleEF	MH	9.8200e-004	2.4000e-004
tblVehicleEF	MH	0.74	0.64
tblVehicleEF	MH	0.06	0.04
tblVehicleEF	MH	0.26	0.23
tblVehicleEF	MH	0.08	0.06
tblVehicleEF	MH	0.02	1.30
tblVehicleEF	MH	0.30	0.09
tblVehicleEF	MH	0.01	0.01
tblVehicleEF	MH	6.7400e-004	1.7900e-004
tblVehicleEF	MH	0.74	0.64
tblVehicleEF	MH	0.06	0.05
tblVehicleEF	MH	0.26	0.23
tblVehicleEF	MH	0.11	0.08
tblVehicleEF	MH	0.02	1.30
tblVehicleEF	MH	0.33	0.10
tblVehicleEF	MHD	0.02	3.5790e-003
tblVehicleEF	MHD	4.0660e-003	1.6940e-003
tblVehicleEF	MHD	0.04	9.1320e-003
tblVehicleEF	MHD	0.37	0.39
tblVehicleEF	MHD	0.33	0.23
tblVehicleEF	MHD	5.40	1.07
tblVehicleEF	MHD	133.37	72.08
tblVehicleEF	MHD	1,186.25	1,080.76
tblVehicleEF	MHD	60.77	9.15
tblVehicleEF	MHD	0.36	0.41
tblVehicleEF	MHD	1.10	1.45
tblVehicleEF	MHD MHD	10.18	1.70
tblVehicleEF		1.0800e-004	3.6900e-004
tblVehicleEF	MHD	3.1100e-003	7.0230e-003
tblVehicleEF	MHD	8.7400e-004	1.1500e-004
tblVehicleEF	MHD	1.0300e-004	3.5300e-004
tblVehicleEF	MHD	2.9690e-003	6.7130e-003
tblVehicleEF	MHD	8.0400e-004	1.0600e-004
tblVehicleEF	MHD	8.3100e-004	3.8300e-004
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	4.4000e-004	1.9800e-004
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	0.02	0.10
tblVehicleEF	MHD	0.32	0.05
tblVehicleEF	MHD	1.2850e-003	6.8400e-004
tblVehicleEF	MHD	0.01	0.01
tblVehicleEF	MHD	7.0200e-004	9.1000e-005
tblVehicleEF	MHD	8.3100e-004	3.8300e-004
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	4.4000e-004	1.9800e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.02	0.10
	MHD		0.10
tblVehicleEF	OBUS	0.35	
tblVehicleEF		0.01	7.0640e-003
tblVehicleEF	OBUS	5.8410e-003	3.6240e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.24	0.58

tblVehicleEF	OBUS	0.41	0.43
tblVehicleEF	OBUS	4.81	1.84
tblVehicleEF	OBUS	100.21	92.66
tblVehicleEF	OBUS	1,290.88	1,326.08
tblVehicleEF	OBUS	66.64	15.18
tblVehicleEF	OBUS	0.21	0.38
tblVehicleEF	OBUS	0.91	1.47
tblVehicleEF	OBUS	2.68	1.09
tblVehicleEF	OBUS	1.9000e-005	1.2200e-004
tblVehicleEF	OBUS	2.7550e-003	7.3930e-003
tblVehicleEF	OBUS	8.3600e-004	1.4500e-004
tblVehicleEF	OBUS	1.9000e-005	1.1700e-004
tblVehicleEF	OBUS	2.6160e-003	7.0600e-003
tblVehicleEF	OBUS	7.6900e-004	1.3300e-004
tblVehicleEF	OBUS	1.1720e-003	1.0900e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.03	0.05
tblVehicleEF	OBUS	5.1800e-004	4.8500e-004
tblVehicleEF	OBUS	0.04	0.02
tblVehicleEF	OBUS	0.03	0.18
tblVehicleEF	OBUS	0.30	0.09
tblVehicleEF	OBUS	9.6800e-004	8.8000e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	7.5100e-004	1.5000e-004
tblVehicleEF	OBUS	1.1720e-003	1.0900e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.04	0.06
tblVehicleEF	OBUS	5.1800e-004	4.8500e-004
tblVehicleEF	OBUS	0.05	0.03
tblVehicleEF	OBUS	0.03	0.18
tblVehicleEF	OBUS	0.33	0.10
tblVehicleEF	SBUS	0.82	0.05
tblVehicleEF	SBUS	0.02	6.0180e-003
tblVehicleEF	SBUS	0.07	4.9720e-003
tblVehicleEF	SBUS	8.25	2.27
tblVehicleEF	SBUS	0.95	0.49
tblVehicleEF	SBUS	9.30	0.72
tblVehicleEF	SBUS	1,096.83	346.78
tblVehicleEF	SBUS	1,045.14	1,049.23
tblVehicleEF	SBUS	56.99	4.12
tblVehicleEF	SBUS	7.84	3.44
tblVehicleEF	SBUS	3.38	4.65
tblVehicleEF	SBUS	11.88	0.86
tblVehicleEF	SBUS	6.9900e-003	3.6120e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.02	0.03
tblVehicleEF	SBUS	9.2200e-004	4.8000e-005
tblVehicleEF	SBUS	6.6880e-003	3.4560e-003
tblVehicleEF	SBUS	2.6210e-003	2.7190e-003
tblVehicleEF	SBUS	0.02	0.03
tblVehicleEF	SBUS	8.4800e-004	4.4000e-005
tblVehicleEF	SBUS	3.3520e-003	5.6700e-004
tblVehicleEF	SBUS	0.04	5.5090e-003
tblVehicleEF	SBUS	0.98	0.25
tblVehicleEF	SBUS	1.4930e-003	2.4700e-004
tblVehicleEF	SBUS	0.10	0.08
tblVehicleEF	SBUS	0.02	0.04
tblVehicleEF	SBUS	0.46	0.03

tblVehicleEF	SBUS	0.01	3.3010e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	7.3000e-004	4.1000e-005
tblVehicleEF	SBUS	3.3520e-003	5.6700e-004
tblVehicleEF	SBUS	0.04	5.5090e-003
tblVehicleEF	SBUS	1.42	0.36
tblVehicleEF	SBUS	1.4930e-003	2.4700e-004
tblVehicleEF	SBUS	0.13	0.10
tblVehicleEF	SBUS	0.02	0.04
tblVehicleEF	SBUS	0.51	0.03
tblVehicleEF	UBUS	0.23	1.35
tblVehicleEF	UBUS	0.04	1.5380e-003
tblVehicleEF	UBUS	4.19	10.12
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tblVehicleEF	UBUS	2,047.05	1,597.16
tblVehicleEF	UBUS	107.16	1.39
tblVehicleEF	UBUS	8.64	0.73
tblVehicleEF	UBUS	14.31	0.01
tblVehicleEF	UBUS	0.59	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.19	5.3280e-003
tblVehicleEF	UBUS	1.1060e-003	1.5000e-005
tblVehicleEF	UBUS	0.25	0.03
tblVehicleEF	UBUS	3.0000e-003	8.3320e-003
tblVehicleEF	UBUS	0.18	5.0960e-003
tblVehicleEF	UBUS	1.0170e-003	1.4000e-005
tblVehicleEF	UBUS	1.8960e-003	2.1000e-005
tblVehicleEF	UBUS	0.03	1.6100e-004
tblVehicleEF	UBUS	9.9500e-004	9.0000e-006
tblVehicleEF	UBUS	0.45	0.02
tblVehicleEF	UBUS	7.1180e-003	8.1400e-004
tblVehicleEF	UBUS	0.55	6.4070e-003
tblVehicleEF	UBUS	0.02	0.01
tblVehicleEF	UBUS	1.2020e-003	1.4000e-005
tblVehicleEF	UBUS	1.8960e-003	2.1000e-005
tblVehicleEF	UBUS	0.03	1.6100e-004
tblVehicleEF	UBUS	9.9500e-004	9.0000e-006
tblVehicleEF	UBUS	0.73	1.38
tblVehicleEF	UBUS	7.1180e-003	8.1400e-004
tblVehicleEF	UBUS	0.61	7.0150e-003
tblVehicleTrips	ST_TR	6.39	3.36
tblVehicleTrips	ST_TR	22.75	0.00
tblVehicleTrips	ST_TR	5.67	4.78
tblVehicleTrips	ST_TR	2.20	1.90
tblVehicleTrips	ST_TR	158.37	106.68
tblVehicleTrips	ST_TR	8.19	6.90
tblVehicleTrips	ST_TR	9.91	6.18
tblVehicleTrips	ST_TR	42.04	28.33
tblVehicleTrips	SU_TR	5.86	3.08
tblVehicleTrips	SU_TR	16.74	0.00
tblVehicleTrips	SU_TR	4.84	4.08
		2.44	2.11
tblVehicleTrips	SU_TR		
tblVehicleTrips	SU_TR	131.84	88.81
tblVehicleTrips	SU_TR	5.95	6.98
tblVehicleTrips	SU_TR	8.62	5.38
tblVehicleTrips	SU_TR	20.43	13.77
tblVehicleTrips	WD_TR	6.65	3.49
tblVehicleTrips	WD_TR	1.89	0.00

tblVehicleTrips	WD_TR	5.81	4.90
tblVehicleTrips	WD_TR	2.74	2.37
tblVehicleTrips	WD_TR	127.15	85.65
tblVehicleTrips	WD_TR	8.17	9.58
tblVehicleTrips	WD_TR	9.52	5.94
tblVehicleTrips	WD_TR	44.32	29.86
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	مر AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	مرم	2.21	0.00
tblWater	nt. AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	مر AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt. AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	مر AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt. AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWoodstoves	NumberCatalytic	6.40	0.00
tblWoodstoves	NumberCatalytic	0.50	0.00
tblWoodstoves	NumberCatalytic	3.70	0.00
tblWoodstoves	NumberCatalytic	1.96	0.00
tblWoodstoves	NumberNoncatalytic	6.40	0.00
tblWoodstoves	NumberNoncatalytic	0.50	0.00
tblWoodstoves	NumberNoncatalytic	3.70	0.00
tblWoodstoves	NumberNoncatalytic	1.96	0.00
tblWoodstoves	WoodstoveWoodMass	582.40	0.00
tblWoodstoves	WoodstoveWoodMass	582.40	0.00
tblWoodstoves	WoodstoveWoodMass	582.40	0.00
tblWoodstoves	WoodstoveWoodMass	956.80	0.00
	:	<u> </u>	

# 2.0 Emissions Summary

# 2.1 Overall Construction Unmitigated Construction

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr												MT	/yr		
2021	0.3517	3.6167	2.2094	4.1100e- 003	1.0418	0.1767	1.2184	0.4209	0.1641	0.5850	0.0000	360.2342	360.2342	0.1006	0.0000	362.7496
2022	1.9790	4.5368	4.5872	8.2400e- 003	0.4504	0.2149	0.6653	0.1980	0.2019	0.4000	0.0000	719.7762	719.7762	0.1876	0.0000	724.4667
2023	4.9515	3.6964	4.3392	7.6500e- 003	0.0000	0.1745	0.1745	0.0000	0.1681	0.1681	0.0000	663.2096	663.2096	0.1250	0.0000	666.3355
Maximum	4.9515	4.5368	4.5872	8.2400e- 003	1.0418	0.2149	1.2184	0.4209	0.2019	0.5850	0.0000	719.7762	719.7762	0.1876	0.0000	724.4667

## Mitigated Construction

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr MT/yr															
2021	0.0715	1.3677	2.5261	4.1100e- 003		6.5100e- 003			6.5100e- 003				360.2338			362.7492
2022	1.6499	3.0909	5.4210	8.2400e- 003	0.1757	0.0207	0.1963	0.0386	0.0207	0.0593	0.0000	719.7754	719.7754	0.1876	0.0000	724.4658
2023	4.6628	2.8766	4.8520	7.6500e- 003	0.0000	0.0333	0.0333	0.0000	0.0333	0.0333	0.0000	663.2088	663.2088	0.1250	0.0000	666.3347
Maximum	4.6628	3.0909	5.4210	8.2400e- 003	0.4063	0.0333	0.4128	0.0821	0.0333	0.0886	0.0000	719.7754	719.7754	0.1876	0.0000	724.4658
	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	12.33	38.10	-14.94	0.00	61.00	89.31	68.79	80.50	88.67	84.29	0.00	0.00	0.00	0.00	0.00	0.00
Quarter	Sta	art Date	En	d Date	Maximu	m Unmitiga	ated ROG	+ NOX (tons	s/quarter)	Maxii	mum Mitigat	ed ROG + I	NOX (tons/q	uarter)		
1	8-	15-2021	11-1	14-2021			2.8596					1.1061				
2	11-	-15-2021	2-1	4-2022			1.7261					0.6075				
3	2-	15-2022	5-1	4-2022			1.0697					0.7570				
4	5-	15-2022	8-1	4-2022			0.9861					0.7088				
5		15-2022		14-2022	2 2.1905 1.6661											
6		-15-2022	<b>2022 2-14-2023</b> 3.1200 2.6043													
7		15-2023		4-2023	2.9549							2.5194		·		
8		15-2023		4-2023			2.9285					2.5426				
9	8-	15-2023		0-2023			1.2213					1.1670				
			Hi	ghest			3.1200					2.6043				

# 2.2 Overall Operational Unmitigated Operational

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Area	4.2606	0.0497	4.3151	2.3000e- 004		0.0239	0.0239		0.0239	0.0239	0.0000	7.0571	7.0571	6.8300e- 003	0.0000	7.2279
Energy	0.0547	0.4956	0.4051	2.9800e- 003		0.0378	0.0378		0.0378	0.0378	0.0000	1,334.385 3	1,334.385 3	0.1199	0.0326	1,347.092 3
Mobile	2.6931	3.5415	18.3162	0.0467	4.9759	0.0388	5.0147	1.3313	0.0363	1.3675	0.0000	4,581.388 4	4,581.388 4	0.2398	0.0000	4,587.383 3
Waste						0.0000	0.0000		0.0000	0.0000	209.3080	0.0000	209.3080	12.3698	0.0000	518.5518
Water						0.0000	0.0000		0.0000	0.0000	20.3932	39.2955	59.6887	0.0756	0.0455	75.1296
Total	7.0084	4.0867	23.0364	0.0499	4.9759	0.1005	5.0764	1.3313	0.0980	1.4292	229.7013	5,962.126 4	6,191.827 7	12.8119	0.0781	6,535.384 9

# Mitigated Operational

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e

Percent Reduction	0.00	0.	.00 0	.00 0.	.00 0	.00 0	.00 0	.00	0.00	0.00	0.0	0.0	00 13	3.30 1	2.81 0.	85 29	0.03 12.2
	ROG	N	Ox (	co s					gitive M2.5	Exhau PM2.		-	CO2 NBio		otal Cl	H4 N	20 CO
Total	7.0084	4.0867	23.0364	0.0499	4.9759	0.1005	5.0764	1.3313	0.09	980	1.4292	229.7013	5,169.093 5	5,398.79 7	4 12.7024	0.0554	5,732.861 9
Water						0.0000	0.0000		0.00	000	0.0000	20.3932	39.2955	59.6887	0.0756	0.0455	75.1296
Waste	ä		ļ		ļ	0.0000	0.0000		0.00	000	0.0000	209.3080	0.0000	209.308	12.3698	0.0000	518.5518
Mobile	2.6931	3.5415	18.3162	0.0467	4.9759	0.0388	5.0147	1.3313	0.03	363	1.3675	0.0000	4,581.388 4	4,581.38 4	8 0.2398	0.0000	4,587.383 3
Energy	0.0547	0.4956	0.4051	2.9800e- 003		0.0378	0.0378		0.03	378	0.0378	0.0000	541.3524	541.352	4 0.0104	9.9200e- 003	544.5693
Area	4.2606	0.0497	4.3151	2.3000e- 004		0.0239	0.0239		0.02	239	0.0239	0.0000	7.0571	7.0571	6.8300e- 003	0.0000	7.2279
Category					ton	s/yr								١	/IT/yr		

## 3.0 Construction Detail

#### **Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	8/15/2021	10/15/2021	5	45	
2	Site Preparation	Site Preparation	10/1/2021	1/26/2022	5	84	
3	Grading	Grading	2/1/2022	7/8/2022	5	114	
4	Trenching/Foundation	Trenching	5/1/2022	11/9/2022	5	138	
5	Building Construction	Building Construction	8/1/2022	7/28/2023	5	260	
6	Architectural Coating	Architectural Coating	10/1/2022	9/30/2023	5	260	
7	Paving	Paving	8/1/2023	11/6/2023	5	70	

Acres of Grading (Site Preparation Phase): 86.1

Acres of Grading (Grading Phase): 86.92

Acres of Paving: 0

Residential Indoor: 1,342,960; Residential Outdoor: 447,653; Non-Residential Indoor: 338,610; Non-Residential Outdoor: 112,870; Striped

## OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	12	3.30	81	0.73
Demolition	Excavators	4	8.00	158	0.38
Demolition	Rubber Tired Dozers	4	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Site Preparation	Graders	4	4.10	187	0.41
Site Preparation	Rubber Tired Dozers	4	6.70	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	5	8.00	97	0.37
Grading	Concrete/Industrial Saws	3	5.00	81	0.73
Grading	Excavators	7	5.60	158	0.38
Grading	Graders	2	6.10	187	0.41
Grading	Rubber Tired Dozers	4	0.90	247	0.40
Grading	Scrapers	0	0.00	367	0.48
Grading	Tractors/Loaders/Backhoes	6	2.90	97	0.37
Trenching/Foundation	Excavators	2	4.50	158	0.38
Trenching/Foundation	Tractors/Loaders/Backhoes	6	3.20	97	0.37
Building Construction	Cranes	5	6.00	231	0.29
Building Construction	Forklifts	4	5.00	89	0.20
Building Construction	Generator Sets	2	0.20	84	0.74
Building Construction	Tractors/Loaders/Backhoes	4	5.10	97	0.37
Building Construction	Welders	3	0.90	46	0.45
Architectural Coating	Aerial Lifts	8	6.00	63	0.31
Architectural Coating	Air Compressors	20	4.00	78	0.48
Paving	Cement and Mortar Mixers	4	2.00	9	0.56
Paving	Pavers	2	1.60	130	0.42
Paving	Paving Equipment	2	1.60	132	0.36

Paving	Rollers	2	1.60	80	0.38
Paving	Tractors/Loaders/Backhoes	1	2.00	97	0.37

#### Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	24	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	13	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	22	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Trenching/Foundation	8	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	18	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	28	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	11	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

## 3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment Replace Ground Cover Water Exposed Area Reduce Vehicle Speed on Unpaved Roads

# 3.2 Demolition - 2021

**Unmitigated Construction On-Site** 

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							МТ	/yr		
Fugitive Dust					0.3304	0.0000	0.3304	0.0500	0.0000	0.0500	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1745	1.6902	1.2705	2.2100e- 003		0.0867	0.0867		0.0813	0.0813	0.0000	192.8385	192.8385	0.0465	0.0000	194.0004
Total	0.1745	1.6902	1.2705	2.2100e- 003	0.3304	0.0867	0.4170	0.0500	0.0813	0.1313	0.0000	192.8385	192.8385	0.0465	0.0000	194.0004

# **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/уг		
Fugitive Dust					0.1288	0.0000	0.1288	9.7500e- 003		9.7500e- 003		0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0373	0.7777	1.4009	2.2100e- 003		3.4000e- 003	3.4000e- 003			3.4000e- 003			192.8382			194.0002
Total	0.0373	0.7777	1.4009	2.2100e- 003	0.1288	3.4000e- 003	0.1322	9.7500e- 003	3.4000e- 003	0.0132	0.0000	192.8382	192.8382	0.0465	0.0000	194.0002

# Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

# 3.3 Site Preparation - 2021 Unmitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	i/yr							MT	/yr		
Fugitive Dust					0.7114	0.0000	0.7114	0.3709	0.0000	0.3709	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1772	1.9265	0.9389	1.9000e- 003		0.0900	0.0900		0.0828	0.0828			167.3958			168.7492
Total	0.1772	1.9265	0.9389	1.9000e- 003	0.7114	0.0900	0.8014	0.3709	0.0828	0.4537	0.0000	167.3958	167.3958	0.0541	0.0000	168.7492

# **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr										MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	

# Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e	
Category	tons/yr										MT/yr						
Fugitive Dust					0.2774	0.0000	0.2774	0.0723	0.0000	0.0723	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Off-Road	0.0342	0.5900	1.1251	1.9000e- 003		3.1100e- 003	3.1100e- 003		3.1100e- 003	3.1100e- 003	0.0000	167.3956	167.3956	0.0541	0.0000	168.7490	
Total	0.0342	0.5900	1.1251	1.9000e- 003	0.2774	3.1100e- 003	0.2806	0.0723	3.1100e- 003	0.0754	0.0000	167.3956	167.3956	0.0541	0.0000	168.7490	

## Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr									MT/yr						
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Vendor	Ë	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	#																
L																	i
Worker		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	ij.																
Total		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

# 3.3 Site Preparation - 2022

## **Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Fugitive Dust					0.2272	0.0000	0.2272	0.1047	0.0000	0.1047	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0403	0.4375	0.2405	5.2000e- 004		0.0197	0.0197		0.0182	0.0182	0.0000	45.6518	45.6518	0.0148	0.0000	46.0209
Total	0.0403	0.4375	0.2405	5.2000e- 004	0.2272	0.0197	0.2469	0.1047	0.0182	0.1229	0.0000	45.6518	45.6518	0.0148	0.0000	46.0209

## Unmitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

### Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/уг		
Fugitive Dust						0.0000				0.0204					0.0000	
	9.3300e- 003			5.2000e- 004		8.5000e- 004							45.6517			
Total	9.3300e- 003	0.1609	0.3069	5.2000e- 004	0.0886	8.5000e- 004	0.0895	0.0204	8.5000e- 004	0.0213	0.0000	45.6517	45.6517	0.0148	0.0000	46.0208

## Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

3.4 Grading - 2022

**Unmitigated Construction On-Site** 

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Fugitive Dust					0.2232	0.0000	0.2232	0.0933	0.0000	0.0933	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1727	1.6860	1.8198	3.2900e- 003		0.0765	0.0765		0.0716	0.0716	0.0000	287.8479	287.8479	0.0777	0.0000	289.7891
Total	0.1727	1.6860	1.8198	3.2900e- 003	0.2232	0.0765	0.2996	0.0933	0.0716	0.1649	0.0000	287.8479	287.8479	0.0777	0.0000	289.7891

## **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Fugitive Dust					0.0870	0.0000	0.0870	0.0182	0.0000	0.0182	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0516	1.2516	2.2189	3.2900e- 003		5.1800e- 003	5.1800e- 003		5.1800e- 003	5.1800e- 003	0.0000	287.8476	287.8476	0.0777	0.0000	289.7887
Total	0.0516	1.2516	2.2189	3.2900e- 003	0.0870	5.1800e- 003	0.0922	0.0182	5.1800e- 003	0.0234	0.0000	287.8476	287.8476	0.0777	0.0000	289.7887

### Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## 3.5 Trenching/Foundation - 2022 <u>Unmitigated Construction On-Site</u>

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Off-Road	0.0430	0.4154	0.6233	9.2000e- 004		0.0216	0.0216		0.0199	0.0199	0.0000	80.4663	80.4663	0.0260	0.0000	81.1169
Total	0.0430	0.4154	0.6233	9.2000e- 004		0.0216	0.0216		0.0199	0.0199	0.0000	80.4663	80.4663	0.0260	0.0000	81.1169

## **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Off-Road	0.0165	0.4011	0.6920	9.2000e- 004		1.5000e- 003	1.5000e- 003		1.5000e- 003	1.5000e- 003	0.0000	80.4662	80.4662	0.0260	0.0000	81.1168
Total	0.0165	0.4011	0.6920	9.2000e- 004		1.5000e- 003	1.5000e- 003		1.5000e- 003	1.5000e- 003	0.0000	80.4662	80.4662	0.0260	0.0000	81.1168

## Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## 3.6 Building Construction - 2022 <u>Unmitigated Construction On-Site</u>

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Off-Road	0.1217	1.2783	0.9044	1.9000e- 003		0.0597	0.0597		0.0550	0.0550	0.0000	166.4016	166.4016	0.0527	0.0000	167.7186
Total	0.1217	1.2783	0.9044	1.9000e- 003		0.0597	0.0597		0.0550	0.0550	0.0000	166.4016	166.4016	0.0527	0.0000	167.7186

## Unmitigated Construction Off-Site

PM10 PM10 Total PM2.5 PM2.5 Total CO2
---------------------------------------

Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

#### Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/yr		
Off-Road	0.0352	0.6340	1.1607	1.9000e- 003		3.9000e- 003	3.9000e- 003		3.9000e- 003	3.9000e- 003	0.0000	166.4014	166.4014	0.0527	0.0000	167.7184
Total	0.0352	0.6340	1.1607	1.9000e- 003		3.9000e- 003	3.9000e- 003		3.9000e- 003	3.9000e- 003	0.0000	166.4014	166.4014	0.0527	0.0000	167.7184

## Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## 3.6 Building Construction - 2023 <u>Unmitigated Construction On-Site</u>

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Off-Road	0.1546	1.5929	1.2136	2.5900e- 003		0.0723	0.0723		0.0667	0.0667	0.0000	226.9671	226.9671	0.0718	0.0000	228.7619
Total	0.1546	1.5929	1.2136	2.5900e- 003		0.0723	0.0723		0.0667	0.0667	0.0000	226.9671	226.9671	0.0718	0.0000	228.7619

### **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Off-Road	0.0479	0.8645	1.5828	2.5900e- 003		5.3100e- 003	5.3100e- 003		5.3100e- 003	5.3100e- 003	0.0000	226.9668	226.9668	0.0718	0.0000	228.7616
Total	0.0479	0.8645	1.5828	2.5900e- 003		5.3100e- 003	5.3100e- 003		5.3100e- 003	5.3100e- 003	0.0000	226.9668	226.9668	0.0718	0.0000	228.7616

#### Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## 3.7 Architectural Coating - 2022 <u>Unmitigated Construction On-Site</u>

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Archit. Coating	1.5056					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0957	0.7196	0.9992	1.6200e- 003		0.0374	0.0374		0.0373	0.0373	0.0000	139.4086	139.4086	0.0165	0.0000	139.8213
Total	1.6013	0.7196	0.9992	1.6200e- 003		0.0374	0.0374		0.0373	0.0373	0.0000	139.4086	139.4086	0.0165	0.0000	139.8213

## **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	уг							MT	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Archit. Coating	1.5056					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Off-Road	0.0317	0.6433	1.0426	1.6200e- 003	9.2400e- 003	9.2400e- 003	 9.2400e- 003	9.2400e- 003	0.0000	139.4085		0.0165	0.0000	139.8211
Total	1.5373	0.6433	1.0426	1.6200e- 003	9.2400e- 003	9.2400e- 003	9.2400e- 003	9.2400e- 003	0.0000	139.4085	139.4085	0.0165	0.0000	139.8211

## Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

### 3.7 Architectural Coating - 2023 Unmitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Archit. Coating	4.5169					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.2694	2.0058	2.9933	4.8500e- 003		0.0975	0.0975		0.0970	0.0970	0.0000	418.2258	418.2258	0.0478	0.0000	419.4201
Total	4.7863	2.0058	2.9933	4.8500e- 003		0.0975	0.0975		0.0970	0.0970	0.0000	418.2258	418.2258	0.0478	0.0000	419.4201

## **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Archit. Coating	4.5169					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0950	1.9299	3.1277	4.8500e- 003		0.0277	0.0277		0.0277	0.0277	0.0000	418.2253	418.2253	0.0478	0.0000	419.4196
Total	4.6119	1.9299	3.1277	4.8500e- 003		0.0277	0.0277		0.0277	0.0277	0.0000	418.2253	418.2253	0.0478	0.0000	419.4196

## Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## 3.8 Paving - 2023

## **Unmitigated Construction On-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Off-Road	0.0106	0.0977	0.1324	2.1000e- 004		4.7400e- 003	4.7400e- 003		4.4000e- 003	4.4000e- 003	0.0000	18.0167	18.0167	5.4700e- 003	0.0000	18.1535
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0106	0.0977	0.1324	2.1000e- 004		4.7400e- 003	4.7400e- 003		4.4000e- 003	4.4000e- 003	0.0000	18.0167	18.0167	5.4700e- 003	0.0000	18.1535

## **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Off-Road	2.9500e- 003	0.0821	0.1416	2.1000e- 004		3.1000e- 004	3.1000e- 004		3.1000e- 004	3.1000e- 004	0.0000	18.0166	18.0166	5.4700e- 003	0.0000	18.1535
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	2.9500e- 003	0.0821	0.1416	2.1000e- 004		3.1000e- 004	3.1000e- 004		3.1000e- 004	3.1000e- 004	0.0000	18.0166	18.0166	5.4700e- 003	0.0000	18.1535

## Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## 4.0 Operational Detail - Mobile

# 4.1 Mitigation Measures Mobile

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Mitigated	2.6931		18.3162					1.3313				4	4,581.388 4			3
Unmitigated	2.6931	3.5415	18.3162	0.0467	4.9759	0.0388	5.0147	1.3313	0.0363	1.3675	0.0000	4,581.388 4	4,581.388 4	0.2398	0.0000	4,587.383 3

## 4.2 Trip Summary Information

	Aver	age Daily Trip F	Rate	Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	1,116.80	1,075.20	985.60	2,522,355	2,522,355
City Park	0.00	0.00	0.00		
Condo/Townhouse	122.50	119.50	102.00	275,173	275,173
Congregate Care (Assisted Living)	438.45	351.50	390.35	968,088	968,088
Enclosed Parking with Elevator	0.00	0.00	0.00		
High Turnover (Sit Down Restaurant)	3,597.30	4,480.56	3730.02	4,342,220	4,342,220
Hotel	2,203.40	1,587.00	1605.40	3,856,697	3,856,697
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Single Family Housing	291.06	302.82	263.62	667,061	667,061
Strip Mall	537.48	509.94	247.86	757,960	757,960
Total	8,306.99	8,426.52	7,324.85	13,389,555	13,389,555

## 4.3 Trip Type Information

		Miles			Trip %			Trip Purpos	e %
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
City Park	9.50	7.30	7.30	33.00	48.00	19.00	66	28	6
Condo/Townhouse	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Congregate Care (Assisted	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Enclosed Parking with Elevator	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
High Turnover (Sit Down	9.50	7.30	7.30	8.50	72.50	19.00	37	20	43
Hotel	9.50	7.30	7.30	19.40	61.60	19.00	58	38	4
Other Non-Asphalt Surfaces	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Single Family Housing	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Strip Mall	9.50	7.30	7.30	16.60	64.40	19.00	45	40	15

### 4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
City Park	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Condo/Townhouse	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Congregate Care (Assisted	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Enclosed Parking with Elevator	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
High Turnover (Sit Down Restaurant)	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Hotel	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Other Non-Asphalt Surfaces	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Parking Lot	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Single Family Housing	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Strip Mall	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752

## 5.0 Energy Detail

## 5.1 Mitigation Measures Energy

Percent of Electricity Use Generated with Renewable Energy

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	793.0330	793.0330	0.1095	0.0227	802.5229
NaturalGas Mitigated	0.0547	0.4956	0.4051	2.9800e- 003		0.0378	0.0378		0.0378	0.0378	0.0000	541.3524	541.3524	0.0104	9.9200e- 003	544.5693
NaturalGas Unmitigated	0.0547	0.4956	0.4051	2.9800e- 003		0.0378	0.0378		0.0378	0.0378	0.0000	541.3524	541.3524	0.0104	9.9200e- 003	544.5693

## 5.2 Energy by Land Use - NaturalGas <u>Unmitigated</u>

	NaturalGa s Use	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr					ton	s/yr							МТ	/yr		
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Condo/Townhous e	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Congregate Care (Assisted Living)		3.1500e- 003	0.0269	0.0114	1.7000e- 004		2.1700e- 003	2.1700e- 003		2.1700e- 003	2.1700e- 003	0.0000	31.1471	31.1471	6.0000e- 004	5.7000e- 004	31.3322
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	006	į	0.4280	0.3595	2.5700e- 003		0.0325	0.0325		0.0325	0.0325	0.0000	465.9173	465.9173	8.9300e- 003	8.5400e- 003	468.6860
Hotel	787265	4.2500e- 003	0.0386	0.0324	2.3000e- 004			2.9300e- 003		2.9300e- 003	2.9300e- 003	0.0000	42.0115	42.0115	8.1000e- 004	7.7000e- 004	42.2611
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Strip Mall	42660	2.3000e- 004	2.0900e- 003	1.7600e- 003	1.0000e- 005		1.6000e- 004	1.6000e- 004		1.6000e- 004	1.6000e- 004	0.0000	2.2765	2.2765	4.0000e- 005	4.0000e- 005	2.2900
Total		0.0547	0.4956	0.4051	2.9800e- 003		0.0378	0.0378		0.0378	0.0378	0.0000	541.3524	541.3524	0.0104	9.9200e- 003	544.5693

## **Mitigated**

	NaturalGa s Use	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr					ton	s/yr							MT	/yr		
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Condo/Townhous e	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Congregate Care (Assisted Living)	583675	3.1500e- 003	0.0269	0.0114	1.7000e- 004		2.1700e- 003	2.1700e- 003		2.1700e- 003	2.1700e- 003	0.0000	31.1471	31.1471	6.0000e- 004	5.7000e- 004	31.3322
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)		0.0471	0.4280	0.3595	2.5700e- 003		0.0325	0.0325		0.0325	0.0325	0.0000	465.9173	465.9173	8.9300e- 003	8.5400e- 003	468.6860
Hotel	787265	4.2500e- 003	0.0386	0.0324	2.3000e- 004		2.9300e- 003	2.9300e- 003		2.9300e- 003	2.9300e- 003	0.0000	42.0115	42.0115	8.1000e- 004	7.7000e- 004	42.2611

Total		0.0547	0.4956	0.4051	2.9800e- 003	0.0378	0.0378	0.0378	0.0378	0.0000	541.3524	541.3524	0.0104	9.9200e- 003	544.5693
Strip Mall	42660	2.3000e- 004	2.0900e- 003	1.7600e- 003	1.0000e- 005	1.6000e- 004	1.6000e- 004	1.6000e- 004	1.6000e- 004	0.0000	2.2765	2.2765	4.0000e- 005	4.0000e- 005	2.2900
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## 5.3 Energy by Land Use - Electricity <u>Unmitigated</u>

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr		M	√yr	
Apartments Mid Rise	1.32188e+ 006	125.9144	0.0174	3.6000e- 003	127.4212
City Park	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhous e	126273	12.0280	1.6600e- 003	3.4000e- 004	12.1720
Congregate Care (Assisted Living)	764043	72.7784	0.0101	2.0800e- 003	73.6493
Enclosed Parking with Elevator	2.8714e+0 06	273.5135	0.0378	7.8100e- 003	276.7865
High Turnover (Sit Down Restaurant)		130.9024	0.0181	3.7400e- 003	132.4689
Hotel	1.2646e+0 06	120.4584	0.0166	3.4400e- 003	121.8998
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	13720	1.3069	1.8000e- 004	4.0000e- 005	1.3225
Single Family Housing	396854	37.8021	5.2200e- 003	1.0800e- 003	38.2545
Strip Mall	192420	18.3289	2.5300e- 003	5.2000e- 004	18.5482
Total		793.0330	0.1095	0.0227	802.5229

## <u>Mitigated</u>

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr		MT	√yr	
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
City Park	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhous e	0	0.0000	0.0000	0.0000	0.0000
Congregate Care (Assisted Living)	0	0.0000	0.0000	0.0000	0.0000
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)		0.0000	0.0000	0.0000	0.0000
Hotel	0	0.0000	0.0000	0.0000	0.0000
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
Strip Mall	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

## 6.0 Area Detail

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	i/yr							MT	/yr		
Mitigated	4.2606	0.0497	4.3151	2.3000e- 004			0.0239		0.0239	0.0239	0.0000	7.0571	7.0571	6.8300e- 003	0.0000	7.2279
Unmitigated	4.2606	0.0497	4.3151	2.3000e- 004		0.0239	0.0239		0.0239	0.0239	0.0000	7.0571	7.0571	6.8300e- 003	0.0000	7.2279

## 6.2 Area by SubCategory

# Unmitigated

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory					tons	s/yr							MT	/yr		
Architectural Coating	0.6023					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	3.5275					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.1309	0.0497	4.3151	2.3000e- 004		0.0239	0.0239		0.0239	0.0239	0.0000	7.0571	7.0571	6.8300e- 003	0.0000	7.2279
Total	4.2606	0.0497	4.3151	2.3000e- 004		0.0239	0.0239		0.0239	0.0239	0.0000	7.0571	7.0571	6.8300e- 003	0.0000	7.2279

#### Mitigated

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory					tons	s/yr							MT	/yr		
Architectural Coating	0.6023					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	3.5275					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.1309	0.0497	4.3151	2.3000e- 004		0.0239	0.0239		0.0239	0.0239	0.0000	7.0571	7.0571	6.8300e- 003	0.0000	7.2279
Total	4.2606	0.0497	4.3151	2.3000e- 004		0.0239	0.0239		0.0239	0.0239	0.0000	7.0571	7.0571	6.8300e- 003	0.0000	7.2279

## 7.0 Water Detail

### 7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category		MT	/yr	
3	59.6887	0.0756	0.0455	75.1296
	59.6887	0.0756	0.0455	75.1296

## 7.2 Water by Land Use Unmitigated

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal		Mī	Г/уг	
Apartments Mid Rise	20.8493 / 13.1441	22.5048	0.0275	0.0165	28.1009
City Park	0 / 2.69275	0.8977	1.2000e- 004	3.0000e- 005	0.9085
Condo/Townhous e	1.62885 / 1.02688	1.7582	2.1500e- 003	1.2900e- 003	2.1954
Congregate Care (Assisted Living)	12.0535 / 7.59894	13.0106	0.0159	9.5200e- 003	16.2459
Enclosed Parking with Elevator	0/0	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)		11.3525	0.0165	0.0100	14.7455
Hotel	5.83436 / 0.648262	5.2875	7.5500e- 003	4.5800e- 003	6.8414
Other Non- Asphalt Surfaces	0/0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0/0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	3.19255 / 2.01269	3.4461	4.2100e- 003	2.5200e- 003	4.3030
Strip Mall	1.33331 / 0.817187	1.4314	1.7600e- 003	1.0500e- 003	1.7892
Total		59.6888	0.0756	0.0455	75.1297

## **Mitigated**

	Indoor/Out	Total CO2	CH4	N2O	CO2e
	door Use				
Land Use	Mgal		Mī	Г/уг	
Apartments Mid Rise	20.8493 / 13.1441	22.5048	0.0275	0.0165	28.1009
City Park	0 / 2.69275	0.8977	1.2000e- 004	3.0000e- 005	0.9085
Condo/Townhous e	1.62885 / 1.02688	1.7582	2.1500e- 003	1.2900e- 003	2.1954
Congregate Care (Assisted Living)	12.0535 / 7.59894	13.0106	0.0159	9.5200e- 003	16.2459
Enclosed Parking with Elevator	0/0	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)		11.3525	0.0165	0.0100	14.7455
Hotel	5.83436 / 0.648262	5.2875	7.5500e- 003	4.5800e- 003	6.8414
Other Non- Asphalt Surfaces	0/0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0/0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	3.19255 / 2.01269	3.4461	4.2100e- 003	2.5200e- 003	4.3030
Strip Mall	1.33331 / 0.817187	1.4314	1.7600e- 003	1.0500e- 003	1.7892
Total		59.6888	0.0756	0.0455	75.1297

## 8.0 Waste Detail

### 8.1 Mitigation Measures Waste

### Category/Year

	Total CO2	CH4	N2O	CO2e
		MT	/yr	
3	209.3080	12.3698	0.0000	518.5518
	209.3080	12.3698	0.0000	518.5518

## 8.2 Waste by Land Use

## <u>Unmitigated</u>

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons		M	Γ/yr	
Apartments Mid Rise	147.2	29.8803	1.7659	0.0000	74.0271
City Park	0.19	0.0386	2.2800e- 003	0.0000	0.0956
Condo/Townhous e	11.5	2.3344	0.1380	0.0000	5.7834
Congregate Care (Assisted Living)	168.81	34.2669	2.0251	0.0000	84.8948
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	499.8	101.4549	5.9958	0.0000	251.3502
Hotel	125.92	25.5606	1.5106	0.0000	63.3254
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	58.8	11.9359	0.7054	0.0000	29.5706
Strip Mall	18.9	3.8365	0.2267	0.0000	9.5048
Total		209.3080	12.3698	0.0000	518.5518

## **Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons		M	Г/уг	
Apartments Mid Rise	147.2	29.8803	1.7659	0.0000	74.0271
City Park	0.19	0.0386	2.2800e- 003	0.0000	0.0956
Condo/Townhous e	11.5	2.3344	0.1380	0.0000	5.7834
Congregate Care (Assisted Living)	168.81	34.2669	2.0251	0.0000	84.8948
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	499.8	101.4549	5.9958	0.0000	251.3502
Hotel	125.92	25.5606	1.5106	0.0000	63.3254
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	58.8	11.9359	0.7054	0.0000	29.5706
Strip Mall	18.9	3.8365	0.2267	0.0000	9.5048
Total		209.3080	12.3698	0.0000	518.5518

## 9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

## 10.0 Stationary Equipment

## Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

### **Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
User Defined Equipment					
Equipment Type	Number				

## 11.0 Vegetation

Cambrian Park Plaza - AQ/GHG Model Alternative 2 - Santa Clara County, Annual

### Cambrian Park Plaza - AQ/GHG Model Alternative 2 Santa Clara County, Annual

#### 1.0 Project Characteristics

#### 1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	160.00	1000sqft	0.00	160,000.00	0
Enclosed Parking with Elevator	1,225.00	Space	0.00	490,000.00	0
Other Non-Asphalt Surfaces	319.47	1000sqft	0.00	319,470.00	0
Parking Lot	98.00	Space	0.00	39,200.00	0
City Park	2.26	Acre	2.26	98,445.60	0
High Turnover (Sit Down Restaurant)	42.00	1000sqft	0.00	42,000.00	0
Hotel	230.00	Room	0.00	165,740.00	0
Apartments Mid Rise	320.00	Dwelling Unit	14.94	340,220.00	915
Condo/Townhouse	25.00	Dwelling Unit	0.00	49,350.00	72
Single Family Housing	49.00	Dwelling Unit	0.00	113,620.00	140
Strip Mall	18.00	1000sqft	0.00	18,000.00	0

#### 1.2 Other Project Characteristics

Wind Speed (m/s) Urbanization Urban 22 Precipitation Freq (Days) 58 Climate Zone Operational Year 2024

Utility Company Pacific Gas & Electric Company

CO2 Intensity **CH4 Intensity** 0.029 **N2O Intensity** 0.006

(lb/MWhr) (lb/MWhr) (lb/MWhr)

#### 1.3 User Entered Comments & Non-Default Data

Project Characteristics - Project in San Jose. PG&E 2017 Intensity Factor used (latest published rate).

Land Use - Alternative 2 with the general office land use. Using plan square footages for the residential land uses and the hardscape/landscape coverage. Site Area is 17.2 acres

Construction Phase - Using total workdays from project applicant 9.8.2020

Off-road Equipment - Project Applicant Equipment List

Trips and VMT - Post-model computation with EMFAC2017

Demolition - Demo 171,205 sf of building and haul 500,000 sf of existing pavement

Grading - Export 400,000 cubic yards of soil

Architectural Coating -

Vehicle Trips - Alternative 2 Project Trip Generation Estimates. Community Open Space would not generate trips

Vehicle Emission Factors - 2024 EMFAC2017 Santa Clara County Emission Factors

Vehicle Emission Factors -

Vehicle Emission Factors -

Woodstoves - No woodstoves or hearths (wood or natural gas)

Area Coating -

Energy Use - SJ Reach Code - All electric for residential and commercial uses, natural gas use for potential kitchens in assisted living, hotel and retail in nontitle 24

Water And Wastewater - 100% percent aerobic since it is assumed that water goes through wastewater treament plants

Construction Off-road Equipment Mitigation - Advanced best management practices, Tier 4 inteirm for exhaust mitigation

Energy Mitigation - SJCE is the electricity provider in San Jose. Will provide 100% carbon free electricity from 2021 on

Fleet Mix - EMFAC2017

Table Name	Column Name	Default Value	New Value
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Dil 100thiA	W. 12	0.01	0.01

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tblFleetMix	UBUS	1.5140e-003	1.2480e-003
tblFleetMix	UBUS	1.5140e-003	1.2480e-003
tblGrading	MaterialExported	0.00	400,000.00
-	LandUseSquareFeet	333,960.00	
tblLandUse			165,740.00
tblLandUse	LandUseSquareFeet	320,000.00	340,220.00
tblLandUse	LandUseSquareFeet	25,000.00	49,350.00
tblLandUse	LandUseSquareFeet	88,200.00	113,620.00
tblLandUse	LotAcreage	3.67	0.00
tblLandUse	LotAcreage	11.02	0.00
tblLandUse	LotAcreage	7.33	0.00
tblLandUse	LotAcreage	0.88	0.00
tblLandUse	LotAcreage	0.96	0.00
tblLandUse	LotAcreage	7.67	0.00
tblLandUse	LotAcreage	8.42	14.94
tblLandUse	LotAcreage	1.56	0.00
tblLandUse	LotAcreage	15.91	0.00
tblLandUse	LotAcreage	0.41	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	12.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	4.00	5.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	7.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	4.00

tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	5.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	4.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00
tblOffRoadEquipment		1.00	20.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount		
	UsageHours	6.00	4.00
tblOffRoadEquipment	UsageHours	8.00	3.30
tblOffRoadEquipment	UsageHours	7.00	6.00
tblOffRoadEquipment	UsageHours	8.00	5.60
tblOffRoadEquipment	UsageHours	8.00	5.00
tblOffRoadEquipment	UsageHours	8.00	0.20
tblOffRoadEquipment	UsageHours	8.00	6.10
tblOffRoadEquipment	UsageHours	8.00	1.60
tblOffRoadEquipment	UsageHours	8.00	1.60
tblOffRoadEquipment	UsageHours	8.00	1.60
tblOffRoadEquipment	UsageHours	8.00	0.90
tblOffRoadEquipment	UsageHours	8.00	6.70
tblOffRoadEquipment	UsageHours	8.00	0.00
tblOffRoadEquipment	UsageHours	7.00	5.10
tblOffRoadEquipment	UsageHours	8.00	2.90
tblOffRoadEquipment	UsageHours	8.00	0.90
tblProjectCharacteristics	CO2IntensityFactor	641.35	210
tblTripsAndVMT	HaulingTripNumber	3,053.00	0.00
tblTripsAndVMT	HaulingTripNumber	50,000.00	0.00
tblTripsAndVMT	VendorTripNumber	261.00	0.00
tblTripsAndVMT	WorkerTripNumber	60.00	0.00
tblTripsAndVMT	WorkerTripNumber	33.00	0.00
tblTripsAndVMT	WorkerTripNumber	55.00	0.00
tblTripsAndVMT	WorkerTripNumber	20.00	0.00
tblTripsAndVMT	WorkerTripNumber	808.00	0.00
tblTripsAndVMT	WorkerTripNumber	162.00	0.00
tblTripsAndVMT	WorkerTripNumber	28.00	0.00
tblVehicleEF	HHD	0.33	0.02
tblVehicleEF	HHD	0.05	0.05
tblVehicleEF	HHD	0.07	0.00
tblVehicleEF	HHD	1.57	6.33
tblVehicleEF	HHD	0.92	0.40
tblVehicleEF	HHD	3.67	5.9420e-003
tblVehicleEF	HHD	4,319.24	1,048.88
tblVehicleEF	HHD	1,548.08	1,413.90
tblVehicleEF	HHD	11.68	0.05
tblVehicleEF	HHD	13.63	5.39
tblVehicleEF	HHD	1.93	2.69
tblVehicleEF	HHD	19.37	2.32
tblVehicleEF	HHD	7.2790e-003	2.5820e-003
tblVehicleEF	HHD	0.06	0.06
tblVehicleEF	HHD	0.04	0.04
tblVehicleEF	HHD	6.1410e-003	0.02
tblVehicleEF	HHD	1.0800e-004	1.0000e-006
tblVehicleEF	HHD	6.9640e-003	2.4710e-003
tblVehicleEF	HHD	0.03	0.03
tblVehicleEF	HHD	8.8360e-003	8.8830e-003
tblVehicleEF	HHD	5.8750e-003	0.02
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tblVehicleEF	HHD	9.9000e-005	1.0000e-006

tblVehicleEF	HHD	4.9100e-003	9.3000e-005
tblVehicleEF	HHD	0.41	0.43
tblVehicleEF	HHD	5.9000e-005	1.0000e-006
tblVehicleEF	HHD	0.09	0.03
tblVehicleEF	HHD	4.0900e-004	4.7300e-004
tblVehicleEF	HHD	0.09	2.0000e-006
tblVehicleEF	HHD	0.04	9.7610e-003
tblVehicleEF	HHD	0.01	0.01
tblVehicleEF			
	HHD	1.7700e-004	0.00
tblVehicleEF	HHD	9.5000e-005	2.0000e-006
tblVehicleEF	HHD	4.9100e-003	9.3000e-005
tblVehicleEF	HHD	0.47	0.49
tblVehicleEF	HHD	5.9000e-005	1.0000e-006
tblVehicleEF	HHD	0.15	0.08
tblVehicleEF	HHD	4.0900e-004	4.7300e-004
tblVehicleEF	HHD	0.10	3.0000e-006
tblVehicleEF	LDA	3.0460e-003	1.7200e-003
tblVehicleEF	LDA	4.1440e-003	0.04
tblVehicleEF	LDA	0.47	0.53
tblVehicleEF	LDA	0.98	2.09
tblVehicleEF	LDA	224.31	239.45
tblVehicleEF	LDA	52.96	50.82
tblVehicleEF	LDA	0.04	0.03
tblVehicleEF	LDA	0.06	0.17
tblVehicleEF	LDA	1.5950e-003	1.2960e-003
tblVehicleEF	LDA	2.2180e-003	1.6800e-003
tblVehicleEF	LDA	1.4690e-003	1.1940e-003
tblVehicleEF	LDA	2.0400e-003	1.5440e-003
tblVehicleEF	LDA	0.03	0.04
tblVehicleEF	LDA	0.08	0.08
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	7.6460e-003	6.4160e-003
tblVehicleEF	LDA	0.04	0.20
tblVehicleEF	LDA	0.06	0.19
tblVehicleEF	LDA	2.2460e-003	9.3000e-005
tblVehicleEF	LDA	5.4600e-004	0.00
tblVehicleEF	LDA	0.03	0.04
tblVehicleEF	LDA	0.08	0.08
tblVehicleEF	LDA	0.02	0.03
tblVehicleEF	LDA	0.01	9.3280e-003
tblVehicleEF	LDA	0.04	0.20
tblVehicleEF	LDA	0.06	0.21
tblVehicleEF	LDT1	6.9850e-003	3.6010e-003
tblVehicleEF	LDT1	9.7160e-003	0.06
tblVehicleEF	LDT1	0.91	0.85
tblVehicleEF	LDT1	2.05	2.27
tblVehicleEF	LDT1	281.97	286.67
tblVehicleEF	LDT1	66.03	61.55
tblVehicleEF	LDT1	0.09	0.07
tblVehicleEF	LDT1	0.11	0.21
tblVehicleEF	LDT1	2.1030e-003	1.6460e-003
tblVehicleEF	LDT1	2.8260e-003	2.1080e-003
tblVehicleEF	LDT1	1.9360e-003	1.5150e-003
tblVehicleEF	LDT1	2.5980e-003	1.9380e-003
tblVehicleEF	LDT1	0.07	0.07
tblVehicleEF	LDT1	0.19	0.15
tblVehicleEF	LDT1	0.06	0.06
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tblVehicleEF	LDT1	0.14	0.54
tblVehicleEF	LDT1	0.13	0.27
tblVehicleEF	LDT1	2.8300e-003	2.6190e-003
tblVehicleEF	LDT1	6.9600e-004	0.00
tblVehicleEF	LDT1	0.07	0.07
tblVehicleEF	LDT1	0.19	0.15
tblVehicleEF	LDT1	0.06	0.06
tblVehicleEF	LDT1	0.03	0.02
tblVehicleEF	LDT1	0.14	0.54
tblVehicleEF	LDT1	0.14	0.30
tblVehicleEF	LDT2	4.5890e-003	2.9320e-003
tblVehicleEF	LDT2	5.7820e-003	0.06
tblVehicleEF	LDT2	0.65	0.74
tblVehicleEF	LDT2	1.32	2.70
tblVehicleEF	LDT2	319.72	308.00
tblVehicleEF	LDT2	74.64	66.71
tblVehicleEF	LDT2	0.06	0.06
tblVehicleEF	LDT2	0.09	0.25
tblVehicleEF	LDT2	1.6510e-003	1.3470e-003
tblVehicleEF	LDT2	2.3140e-003	1.7010e-003
tblVehicleEF	LDT2	1.5190e-003	1.2400e-003
tblVehicleEF	LDT2	2.1270e-003	1.5640e-003
tblVehicleEF	LDT2	0.04	0.06
tblVehicleEF	LDT2	0.10	0.12
tblVehicleEF	LDT2	0.04	0.06
tblVehicleEF	LDT2	0.01	0.01
tblVehicleEF	LDT2	0.07	0.41
tblVehicleEF	LDT2	0.08	0.28
tblVehicleEF	LDT2	3.2020e-003	0.01
tblVehicleEF	LDT2	7.6800e-004	9.1000e-005
tblVehicleEF	LDT2	0.04	0.06
tblVehicleEF	LDT2	0.10	0.12
tblVehicleEF	LDT2	0.04	0.06
tblVehicleEF	LDT2	0.02	0.02
tblVehicleEF	LDT2	0.07	0.41
tblVehicleEF	LDT2	0.09	0.31
tblVehicleEF	LHD1	5.1130e-003	4.9880e-003
tblVehicleEF	LHD1	0.02	7.8580e-003
tblVehicleEF	LHD1	0.02	0.01
tblVehicleEF	LHD1	0.15	0.18
tblVehicleEF	LHD1	0.94	0.71
tblVehicleEF	LHD1	2.42	1.05
tblVehicleEF	LHD1	8.98	8.86
tblVehicleEF	LHD1	679.88	779.34
tblVehicleEF	LHD1	31.45	11.55
tblVehicleEF	LHD1	0.07	0.06
tblVehicleEF	LHD1	1.00	0.65
tblVehicleEF	LHD1	0.94	0.30
tblVehicleEF	LHD1	8.5700e-004	8.4200e-004
tblVehicleEF	LHD1	0.01	9.7790e-003
tblVehicleEF	LHD1	0.01	9.6230e-003
tblVehicleEF	LHD1	9.0500e-004	2.4700e-004
tblVehicleEF	LHD1	8.2000e-004	8.0500e-004
tblVehicleEF	LHD1	2.5360e-003	2.4450e-003
tblVehicleEF	LHD1	0.01	9.1590e-003
tblVehicleEF	LHD1	8.3200e-004	2.2800e-004
tblVehicleEF	LHD1	2.5370e-003	1.9120e-003
tblVehicleEF	LHD1	0.10	0.07

tblVehicleEF	LHD1	0.02	0.02
tblVehicleEF	LHD1	1.3080e-003	9.8500e-004
tblVehicleEF	LHD1	0.12	0.09
tblVehicleEF	LHD1	0.32	0.50
tblVehicleEF	LHD1	0.24	0.07
tblVehicleEF	LHD1	9.0000e-005	8.6000e-005
tblVehicleEF	LHD1	6.6680e-003	7.6080e-003
tblVehicleEF	LHD1	3.6000e-004	1.1400e-004
tblVehicleEF	LHD1	2.5370e-003	1.9120e-003
tblVehicleEF	LHD1	0.10	0.07
tblVehicleEF	LHD1	0.02	0.03
tblVehicleEF	LHD1	1.3080e-003	9.8500e-004
tblVehicleEF	LHD1	0.14	0.11
tblVehicleEF	LHD1	0.32	0.50
tblVehicleEF	LHD1	0.26	0.08
tblVehicleEF	LHD2	3.1970e-003	3.0380e-003
tblVehicleEF	LHD2	7.0200e-003	6.6540e-003
tblVehicleEF	LHD2	5.9370e-003	7.7290e-003
tblVehicleEF	LHD2	0.12	0.14
tblVehicleEF	LHD2	0.53	0.59
tblVehicleEF	LHD2	1.09	0.60
tblVehicleEF	LHD2	13.93	13.88
tblVehicleEF	LHD2	699.69	754.92
tblVehicleEF	LHD2	23.61	7.59
tblVehicleEF	LHD2	0.09	0.09
tblVehicleEF	LHD2	0.59	0.77
tblVehicleEF	LHD2	0.41	0.17
tblVehicleEF	LHD2	1.2120e-003	1.4370e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	4.0000e-004	1.2700e-004
tblVehicleEF	LHD2	1.1590e-003	1.3750e-003
tblVehicleEF	LHD2	2.6950e-003	2.6920e-003
tblVehicleEF	LHD2	0.01	0.01
tblVehicleEF	LHD2	3.6800e-004	1.1700e-004
tblVehicleEF	LHD2	7.4700e-004	9.8500e-004
tblVehicleEF	LHD2	0.03	0.04
tblVehicleEF	LHD2	0.01	0.02
tblVehicleEF	LHD2	4.0800e-004	5.1400e-004
tblVehicleEF	LHD2	0.10	0.11
tblVehicleEF	LHD2	0.06	0.25
tblVehicleEF	LHD2	0.08	0.04
tblVehicleEF	LHD2	1.3600e-004	1.3300e-004
tblVehicleEF	LHD2	6.8030e-003	7.2890e-003
tblVehicleEF	LHD2	2.5500e-004	7.5000e-005
tblVehicleEF	LHD2	7.4700e-004	9.8500e-004
tblVehicleEF	LHD2	0.03	0.04
tblVehicleEF	LHD2	0.02	0.02
tblVehicleEF	LHD2	4.0800e-004	5.1400e-004
tblVehicleEF	LHD2	0.12	0.13
tblVehicleEF	LHD2	0.06	0.25
tblVehicleEF	LHD2	0.09	0.04
tblVehicleEF	MCY	0.45	0.33
tblVehicleEF	MCY	0.16	0.25
tblVehicleEF	MCY	18.47	18.60
tblVehicleEF	MCY	10.21	9.06
tblVehicleEF	MCY	170.05	210.08
tblVehicleEF	MCY	44.74	60.71

tblVehicleEF	MCY	1.14	1.15
tblVehicleEF	MCY	0.32	0.27
tblVehicleEF	MCY	2.0290e-003	1.9970e-003
tblVehicleEF	MCY	3.5220e-003	2.9300e-003
tblVehicleEF	MCY	1.8960e-003	1.8650e-003
tblVehicleEF	MCY	3.3110e-003	2.7520e-003
tblVehicleEF	MCY	0.90	1.80
tblVehicleEF	MCY	0.68	0.68
tblVehicleEF	MCY	0.49	0.98
tblVehicleEF	MCY	2.18	2.19
tblVehicleEF	MCY	0.58	1.89
tblVehicleEF	MCY	2.18	1.93
tblVehicleEF	MCY	2.0670e-003	2.0790e-003
tblVehicleEF	MCY	6.7900e-004	6.0100e-004
tblVehicleEF	MCY	0.90	1.80
tblVehicleEF	MCY	0.68	0.68
tblVehicleEF	MCY	0.49	0.98
tblVehicleEF	MCY	2.71	2.72
tblVehicleEF	MCY	0.58	1.89
tblVehicleEF	MCY	2.38	2.10
tblVehicleEF	MDV	8.4590e-003	3.4000e-003
tblVehicleEF	MDV	0.01	0.07
tblVehicleEF	MDV	0.97	0.78
tblVehicleEF	MDV	2.43	2.96
tblVehicleEF	MDV	429.38	372.42
tblVehicleEF	MDV	98.57	79.53
tblVehicleEF	MDV	0.12	0.07
tblVehicleEF	MDV	0.21	0.29
tblVehicleEF	MDV	1.7680e-003	1.4380e-003
tblVehicleEF	MDV	2.4430e-003	1.8100e-003
tblVehicleEF	MDV	1.6290e-003	1.3260e-003
tblVehicleEF	MDV	2.2460e-003	1.6640e-003
tblVehicleEF	MDV	0.06	0.07
tblVehicleEF	MDV	0.16	0.13
tblVehicleEF	MDV	0.06	0.07
tblVehicleEF	MDV	0.02	0.01
tblVehicleEF	MDV	0.10	0.43
tblVehicleEF	MDV	0.18	0.34
tblVehicleEF	MDV	4.2980e-003	3.6060e-003
tblVehicleEF	MDV	1.0280e-003	7.7100e-004
tblVehicleEF	MDV	0.06	0.07
tblVehicleEF	MDV	0.16	0.13
tblVehicleEF	MDV	0.06	0.13
tblVehicleEF	MDV	0.03	0.02
tblVehicleEF	MDV	0.10	0.43
tblVehicleEF	MDV	0.20	0.38
tblVehicleEF	MH	0.02	9.5570e-003
tblVehicleEF	MH	0.02	0.02
tblVehicleEF	MH	1.61	0.93
tblVehicleEF	MH	5.16	2.03
tblVehicleEF	MH	1,207.03	1,501.42
tblVehicleEF	MH	58.43	18.14
tblVehicleEF	MH	1.20	1.31
tblVehicleEF	MH	0.77	0.24
tblVehicleEF	MH	0.01	0.01
tblVehicleEF	MH	0.02	0.02
tblVehicleEF	MH	1.0680e-003	2.6100e-004

tblVehicleEF	MH	0.02	0.02
tblVehicleEF	MH	9.8200e-004	2.4000e-004
tblVehicleEF	MH	0.74	0.64
tblVehicleEF	MH	0.06	0.05
tblVehicleEF	MH	0.26	0.23
tblVehicleEF	MH	0.08	0.06
tblVehicleEF	MH	0.02	1.30
tblVehicleEF	MH	0.30	0.09
tblVehicleEF	MH	0.01	0.01
tblVehicleEF	MH	6.7400e-004	1.7900e-004
tblVehicleEF	MH	0.74	0.64
tblVehicleEF	MH	0.06	0.05
tblVehicleEF	MH	0.26	0.23
tblVehicleEF	MH	0.11	0.08
tblVehicleEF	MH	0.02	1.30
tblVehicleEF	MH	0.33	0.10
tblVehicleEF	MHD	0.02	3.5790e-003
tblVehicleEF	MHD	4.0660e-003	1.6940e-003
tblVehicleEF	MHD	0.04	9.1320e-003
tblVehicleEF	MHD	0.37	0.39
tblVehicleEF	MHD	0.33	0.23
tblVehicleEF	MHD	5.40	1.07
tblVehicleEF	MHD	133.37	72.08
tblVehicleEF	MHD	1,186.25	1,080.76
tblVehicleEF	MHD	60.77	9.15
tblVehicleEF	MHD	0.36	0.41
tblVehicleEF	MHD	1.10	1.45
tblVehicleEF	MHD	10.18	1.70
tblVehicleEF	MHD	1.0800e-004	3.6900e-004
tblVehicleEF	MHD	3.1100e-003	7.0230e-003
tblVehicleEF	MHD	8.7400e-003	1.1500e-004
tblVehicleEF	MHD	1.0300e-004	3.5300e-004
tblVehicleEF	MHD MHD	2.9690e-003	6.7130e-003
tblVehicleEF		8.0400e-004	1.0600e-004
tblVehicleEF	MHD	8.3100e-004	3.8300e-004
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	0.02	0.02
tblVehicleEF	MHD	4.4000e-004	1.9800e-004
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	0.02	0.10
tblVehicleEF	MHD	0.32	0.05
tblVehicleEF	MHD	1.2850e-003	6.8400e-004
tblVehicleEF	MHD	0.01	0.01
tblVehicleEF	MHD	7.0200e-004	9.1000e-005
tblVehicleEF	MHD	8.3100e-004	3.8300e-004
tblVehicleEF	MHD	0.04	0.02
tblVehicleEF	MHD	0.03	0.02
tblVehicleEF	MHD	4.4000e-004	1.9800e-004
tblVehicleEF	MHD	0.05	0.02
tblVehicleEF	MHD	0.02	0.10
tblVehicleEF	MHD	0.35	0.05
tblVehicleEF	OBUS	0.01	7.0640e-003
tblVehicleEF	OBUS	5.8410e-003	3.6240e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.24	0.58
tblVehicleEF	OBUS	0.41	0.43
tblVehicleEF	OBUS	4.81	1.84
tblVehicleEF	OBUS	100.21	92.66

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tblVehicleEF tblVehicleEF	OBUS	1,290.88 66.64	1,326.08 15.18
tblVehicleEF	OBUS	0.21	0.38
tblVehicleEF	OBUS OBUS	0.91	1.47
tblVehicleEF		2.68	1.09
tblVehicleEF	OBUS	1.9000e-005	1.2200e-004
tblVehicleEF	OBUS	2.7550e-003	7.3930e-003
tblVehicleEF	OBUS	8.3600e-004	1.4500e-004
tblVehicleEF	OBUS	1.9000e-005	1.1700e-004
tblVehicleEF	OBUS	2.6160e-003	7.0600e-003
tblVehicleEF	OBUS	7.6900e-004	1.3300e-004
tblVehicleEF	OBUS	1.1720e-003	1.0900e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.03	0.05
tblVehicleEF	OBUS	5.1800e-004	4.8500e-004
tblVehicleEF	OBUS	0.04	0.02
tblVehicleEF	OBUS	0.03	0.18
tblVehicleEF	OBUS	0.30	0.09
tblVehicleEF	OBUS	9.6800e-004	8.8000e-004
tblVehicleEF	OBUS	0.01	0.01
tblVehicleEF	OBUS	7.5100e-004	1.5000e-004
tblVehicleEF	OBUS	1.1720e-003	1.0900e-003
tblVehicleEF	OBUS	0.02	0.02
tblVehicleEF	OBUS	0.04	0.06
tblVehicleEF	OBUS	5.1800e-004	4.8500e-004
tblVehicleEF	OBUS	0.05	0.03
tblVehicleEF	OBUS	0.03	0.18
tblVehicleEF	OBUS	0.33	0.10
tblVehicleEF	SBUS	0.82	0.05
tblVehicleEF	SBUS	0.02	6.0180e-003
tblVehicleEF	SBUS	0.07	4.9720e-003
tblVehicleEF	SBUS	8.25	2.27
		0.95	0.49
tblVehicleEF	SBUS	9.30	0.49
tblVehicleEF			
tblVehicleEF	SBUS	1,096.83	346.78
tblVehicleEF	SBUS	1,045.14	1,049.23
tblVehicleEF	SBUS	56.99	4.12
tblVehicleEF	SBUS	7.84	3.44
tblVehicleEF	SBUS	3.38	4.65
tblVehicleEF	SBUS	11.88	0.86
tblVehicleEF	SBUS	6.9900e-003	3.6120e-003
tblVehicleEF	SBUS	0.01	0.01
tblVehicleEF	SBUS	0.02	0.03
tblVehicleEF	SBUS	9.2200e-004	4.8000e-005
tblVehicleEF	SBUS	6.6880e-003	3.4560e-003
tblVehicleEF	SBUS	2.6210e-003	2.7190e-003
tblVehicleEF	SBUS	0.02	0.03
tblVehicleEF	SBUS	8.4800e-004	4.4000e-005
tblVehicleEF	SBUS	3.3520e-003	5.6700e-004
tblVehicleEF	SBUS	0.04	5.5090e-003
tblVehicleEF	SBUS	0.98	0.25
tblVehicleEF	SBUS	1.4930e-003	2.4700e-004
tblVehicleEF	SBUS	0.10	0.08
tblVehicleEF	SBUS	0.02	0.04
tblVehicleEF	SBUS	0.46	0.03
thIVobioloEE	SBUS	0.01	3.3010e-003
tblVehicleEF			:
tblVehicleEF	SBUS	0.01	0.01

tblVehicleEF	SBUS	3.3520e-003	5.6700e-004
tblVehicleEF	SBUS	0.04	5.5090e-003
tblVehicleEF	SBUS	1.42	0.36
tblVehicleEF	SBUS	1.4930e-003	2.4700e-004
tblVehicleEF	SBUS	0.13	0.10
tblVehicleEF	SBUS	0.02	0.04
tblVehicleEF	SBUS	0.51	0.03
tblVehicleEF	UBUS	0.23	1.35
tblVehicleEF	UBUS	0.04	1.5380e-003
tblVehicleEF	UBUS	4.19	10.12
tblVehicleEF	UBUS	7.24	0.14
tblVehicleEF	UBUS	2,047.05	1,597.16
tblVehicleEF	UBUS	107.16	1.39
tblVehicleEF	UBUS	8.64	0.73
tblVehicleEF	UBUS	14.31	0.01
tblVehicleEF	UBUS	0.59	0.07
tblVehicleEF	UBUS	0.01	0.03
tblVehicleEF	UBUS	0.19	5.3280e-003
tblVehicleEF	UBUS	1.1060e-003	1.5000e-005
tblVehicleEF	UBUS	0.25	0.03
tblVehicleEF	UBUS	3.0000e-003	8.3320e-003
tblVehicleEF	UBUS	0.18	5.0960e-003
tblVehicleEF	UBUS	1.0170e-003	1.4000e-005
tblVehicleEF	UBUS	1.8960e-003	2.1000e-005
tblVehicleEF	UBUS	0.03	1.6100e-004
	UBUS		
tblVehicleEF		9.9500e-004	9.0000e-006
tblVehicleEF	UBUS	0.45	0.02
tblVehicleEF	UBUS	7.1180e-003	8.1400e-004
tblVehicleEF	UBUS	0.55	6.4070e-003
tblVehicleEF	UBUS	0.02	0.01
tblVehicleEF	UBUS	1.2020e-003	1.4000e-005
tblVehicleEF	UBUS	1.8960e-003	2.1000e-005
tblVehicleEF	UBUS	0.03	1.6100e-004
tblVehicleEF	UBUS	9.9500e-004	9.0000e-006
tblVehicleEF	UBUS	0.73	1.38
tblVehicleEF	UBUS	7.1180e-003	8.1400e-004
tblVehicleEF	UBUS	0.61	7.0150e-003
tblVehicleTrips	ST_TR	6.39	3.36
tblVehicleTrips	ST_TR	22.75	0.00
tblVehicleTrips	ST_TR	5.67	4.78
tblVehicleTrips	ST_TR	2.46	1.75
tblVehicleTrips	ST_TR	158.37	106.68
tblVehicleTrips	ST_TR	8.19	6.90
tblVehicleTrips	ST_TR	9.91	6.18
tblVehicleTrips	ST_TR	42.04	28.33
tblVehicleTrips	SU_TR	5.86	3.08
tblVehicleTrips	SU_TR	16.74	0.00
tblVehicleTrips	SU_TR	4.84	4.08
tblVehicleTrips	SU_TR	1.05	0.75
tblVehicleTrips	SU_TR	131.84	88.81
tblVehicleTrips	SU_TR	5.95	6.98
tblVehicleTrips	SU_TR	8.62	5.38
tblVehicleTrips	SU_TR	20.43	13.77
tblVehicleTrips	WD_TR	6.65	3.49
tblVehicleTrips	WD_TR	1.89	0.00
tblVehicleTrips	WD_TR	5.81	4.90
tblVehicleTrips	WD_TR	11.03	7.84
tblVehicleTrips	WD_TR	127.15	85.65

tblVehicleTrips	WD_TR	8.17	9.58
tblVehicleTrips	WD_TR	9.52	5.94
tblVehicleTrips	WD_TR	44.32	29.86
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AerobicPercent	87.46	100.00
tblWater	AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt AnaerobicandFacultativeLagoonsPerce	2.21	0.00
	nt. AnaerobicandFacultativeLagoonsPerce		
tblWater	AnaerobicandFacultativeLagoonsPercent. AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	AnaerobicandFacultativeLagoonsPercent. AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt. AnaerobicandFacultativeLagoonsPerce nt.	2.21	0.00
tblWater	AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt. AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt AnaerobicandFacultativeLagoonsPerce	2.21	0.00
tblWater	nt SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWater	SepticTankPercent	10.33	0.00
tblWoodstoves	NumberCatalytic	6.40	0.00
tblWoodstoves	NumberCatalytic	0.50	0.00
tblWoodstoves	NumberCatalytic	1.96	0.00
tblWoodstoves	NumberNoncatalytic	6.40	0.00
tblWoodstoves	NumberNoncatalytic	0.50	0.00
tblWoodstoves	NumberNoncatalytic	1.96	0.00
tblWoodstoves	WoodstoveWoodMass	582.40	0.00
tblWoodstoves	WoodstoveWoodMass	582.40	0.00
tblWoodstoves	WoodstoveWoodMass	956.80	0.00

## 2.0 Emissions Summary

## 2.1 Overall Construction Unmitigated Construction

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year					tons	:/yr							MT.	/yr		
2021	0.3517	3.6167	2.2094	4.1100e- 003	1.0418	0.1767	1.2184	0.4209	0.1641	0.5850	0.0000	360.2342	360.2342	0.1006	0.0000	362.7496
2022	1.9060	4.5368	4.5872	8.2400e- 003	0.4504	0.2149	0.6653	0.1980	0.2019	0.4000	0.0000	719.7762	719.7762	0.1876		724.4667

2023	4.7325	3.6964	4.3392	7.6500e- 003	0.0000	0.1745	0.1745	0.0000	0.1681	0.1681			663.2096		0.0000	666.3355
Maximum	4.7325	4.5368	4.5872	8.2400e- 003	1.0418	0.2149	1.2184	0.4209	0.2019	0.5850	0.0000	719.7762	719.7762	0.1876	0.0000	724.4667

## **Mitigated Construction**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year					ton	s/yr							M	Г/уг		
2021	0.0715	1.3677	2.5261	4.1100e- 003	0.4063	6.5100e- 003	0.4128	0.0821	6.5100e- 003	0.0886	0.0000	360.2338	360.2338	0.1006	0.0000	362.7492
2022	1.5769	3.0909	5.4210	8.2400e- 003	0.1757	0.0207	0.1963	0.0386	0.0207	0.0593	0.0000	719.7754	719.7754	0.1876	0.0000	724.4658
2023	4.4438	2.8766	4.8520	7.6500e- 003	0.0000	0.0333	0.0333	0.0000	0.0333	0.0333	0.0000	663.2088	663.2088	0.1250	0.0000	666.3347
Maximum	4.4438	3.0909	5.4210	8.2400e- 003	0.4063	0.0333	0.4128	0.0821	0.0333	0.0886	0.0000	719.7754	719.7754	0.1876	0.0000	724.4658
	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	12.85	38.10	-14.94	0.00	61.00	89.31	68.79	80.50	88.67	84.29	0.00	0.00	0.00	0.00	0.00	0.00
Quarter	Sta	art Date	En	d Date	Maximu	m Unmitiga	ated ROG -	NOX (tons	(quarter)	Maxin	num Mitigat	ed ROG + N	NOX (tons/q	uarter)		
1	8-1	15-2021	11-1	4-2021			2.8596					1.1061				
2	11-	15-2021	2-1	4-2022			1.7261					0.6075				
3	2-1	15-2022	5-1	4-2022			1.0697					0.7570				
4	5-1	15-2022	8-1	4-2022			0.9861					0.7088				
5	8-1	15-2022	11-1	4-2022			2.1544					1.6300				
6	11-	15-2022	2-1	4-2023			3.0462					2.5305				
7	2-1	15-2023	5-1	4-2023			2.8835					2.4480				
8	5-1	15-2023	8-1	4-2023			2.8547					2.4688				
9	8-1	15-2023	9-3	0-2023			1.1836					1.1293				
			Hi	ghest			3.0462					2.5305				

## 2.2 Overall Operational Unmitigated Operational

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	i/yr							MT	/yr		
Area	4.1903	0.0339	2.9435	1.6000e- 004		0.0163	0.0163		0.0163	0.0163	0.0000	4.8162	4.8162	4.6800e- 003	0.0000	4.9333
Energy	0.0516	0.4687	0.3937	2.8100e- 003		0.0356	0.0356		0.0356	0.0356	0.0000	1,502.439 7	1,502.439 7	0.1468	0.0377	1,517.345 3
Mobile	2.8798	3.8449	19.8519	0.0512	5.4626	0.0425	5.5050	1.4615	0.0397	1.5011	0.0000	5,021.807 0	5,021.807 0	0.2584	0.0000	5,028.266 6
Waste						0.0000	0.0000		0.0000	0.0000	205.2462	0.0000	205.2462	12.1297	0.0000	508.4888
Water						0.0000	0.0000		0.0000	0.0000	26.1899	51.0175	77.2074	0.0972	0.0584	97.0439
Total	7.1216	4.3475	23.1891	0.0542	5.4626	0.0944	5.5569	1.4615	0.0916	1.5530	231.4361	6,580.080 3	6,811.516 4	12.6368	0.0961	7,156.077 8

### Mitigated Operational

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	i/yr							MT	/yr		
Area	4.1903	0.0339	2.9435	1.6000e- 004		0.0163	0.0163		0.0163	0.0163	0.0000	4.8162	4.8162	4.6800e- 003	0.0000	4.9333
Energy	0.0516	0.4687	0.3937	2.8100e- 003		0.0356	0.0356		0.0356	0.0356			510.2052	003	003	
Mobile	2.8798		19.8519						0.0397			0	5,021.807 0			5,028.266 6

Waste							0.000	0.0000		C	.0000	0.0000	20	5.2462	0.0000	205.24	62 12	.1297	0.0000	508.4	888
Water	¥						0.000	0.0000		C	.0000	0.0000	) 26	.1899 5	1.0175	77.207	4 0.0	0972	0.0584	97.04	139
Total	7.1216	4.347	5 23.1	891 0.	0542	5.4626	0.094	5.5569	1.40	615 0	.0916	1.5530	23	1.4361 5	587.845 9	5,819.2 9	81 12	.4997	0.0678	6,151. 6	969
	ROG		NOx	СО	SO		ugitive PM10		PM10 Total	Fugitive PM2.5			PM2.5 Total	Bio- CC	2 NBio		Total CO2	CH4	N	20	CO2e
Percent Reduction	0.00		0.00	0.00	0.0	00	0.00	0.00	0.00	0.00	0.	00	0.00	0.00	15.	80	14.57	1.08	29	.50	14.03

#### 3.0 Construction Detail

#### **Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	8/15/2021	10/15/2021	5	45	
2	Site Preparation	Site Preparation	10/1/2021	1/26/2022	5	84	
3	Grading	Grading	2/1/2022	7/8/2022	5	114	
4	Trenching/Foundation	Trenching	5/1/2022	11/9/2022	5	138	
5	Building Construction	Building Construction	8/1/2022	7/28/2023	5	260	
6	Architectural Coating	Architectural Coating	10/1/2022	9/30/2023	5	260	
7	Paving	Paving	8/1/2023	11/6/2023	5	70	

Acres of Grading (Site Preparation Phase): 86.1

Acres of Grading (Grading Phase): 86.92

Acres of Paving: 0

Residential Indoor: 1,018,960; Residential Outdoor: 339,653; Non-Residential Indoor: 578,610; Non-Residential Outdoor: 192,870; Striped

#### OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	12	3.30	81	0.73
Demolition	Excavators	4	8.00	158	0.38
Demolition	Rubber Tired Dozers	4	8.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Site Preparation	Graders	4	4.10	187	0.41
Site Preparation	Rubber Tired Dozers	4	6.70	247	0.40
Site Preparation	Tractors/Loaders/Backhoes	5	8.00	97	0.37
Grading	Concrete/Industrial Saws	3	5.00	81	0.73
Grading	Excavators	7	5.60	158	0.38
Grading	Graders	2	6.10	187	0.41
Grading	Rubber Tired Dozers	4	0.90	247	0.40
Grading	Scrapers	0	0.00	367	0.48
Grading	Tractors/Loaders/Backhoes	6	2.90	97	0.37
Trenching/Foundation	Excavators	2	4.50	158	0.38
Trenching/Foundation	Tractors/Loaders/Backhoes	6	3.20	97	0.37
Building Construction	Cranes	5	6.00	231	0.29
Building Construction	Forklifts	4	5.00	89	0.20
Building Construction	Generator Sets	2	0.20	84	0.74
Building Construction	Tractors/Loaders/Backhoes	4	5.10	97	0.37
Building Construction	Welders	3	0.90	46	0.45
Architectural Coating	Aerial Lifts	8	6.00	63	0.31
Architectural Coating	Air Compressors	20	4.00	78	0.48
Paving	Cement and Mortar Mixers	4	2.00	9	0.56
Paving	Pavers	2	1.60	130	0.42
Paving	Paving Equipment	2	1.60	132	0.36
Paving	Rollers	2	1.60	80	0.38
Paving	Tractors/Loaders/Backhoes	1	2.00	97	0.37

#### Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	24	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix		HHDT
Site Preparation	13	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	22	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Trenching/Foundation	8	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	18	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	28	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	11	0.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

### 3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment Replace Ground Cover Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

# 3.2 Demolition - 2021

**Unmitigated Construction On-Site** 

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	i/yr							MT	/yr		
Fugitive Dust					0.3304	0.0000	0.3304	0.0500	0.0000	0.0500	0.0000	0.0000			0.0000	0.0000
Off-Road	0.1745	1.6902	1.2705	2.2100e- 003		0.0867	0.0867		0.0813	0.0813	0.0000	192.8385	192.8385	0.0465	0.0000	194.0004
Total	0.1745	1.6902	1.2705	2.2100e- 003	0.3304	0.0867	0.4170	0.0500	0.0813	0.1313	0.0000	192.8385	192.8385	0.0465	0.0000	194.0004

### **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

### Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Fugitive Dust					0.1288	0.0000	0.1288	9.7500e- 003	0.0000	9.7500e- 003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0373	0.7777	1.4009	2.2100e- 003		3.4000e- 003	3.4000e- 003		3.4000e- 003	3.4000e- 003	0.0000	192.8382	192.8382	0.0465	0.0000	194.0002
Total	0.0373	0.7777	1.4009	2.2100e- 003	0.1288	3.4000e- 003	0.1322	9.7500e- 003	3.4000e- 003	0.0132	0.0000	192.8382	192.8382	0.0465	0.0000	194.0002

# Mitigated Construction Off-Site

ROG NOx CO SO2		gitive Exhaust PM2.5 Bio- CO2 M2.5 PM2.5 Total	2 NBio- Total CO2 CH4 N2O (	CO2e
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Category					tons	s/yr							MT	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## 3.3 Site Preparation - 2021 Unmitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Fugitive Dust					0.7114	0.0000	0.7114	0.3709	0.0000	0.3709	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.1772	1.9265	0.9389	1.9000e- 003		0.0900	0.0900		0.0828	0.0828	0.0000	167.3958	167.3958	0.0541	0.0000	168.7492
Total	0.1772	1.9265	0.9389	1.9000e- 003	0.7114	0.0900	0.8014	0.3709	0.0828	0.4537	0.0000	167.3958	167.3958	0.0541	0.0000	168.7492

## **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Fugitive Dust					0.2774	0.0000	0.2774	0.0723	0.0000	0.0723	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0342	0.5900	1.1251	1.9000e- 003		3.1100e- 003	3.1100e- 003		3.1100e- 003	3.1100e- 003	0.0000	167.3956	167.3956	0.0541	0.0000	168.7490
Total	0.0342	0.5900	1.1251	1.9000e- 003	0.2774	3.1100e- 003	0.2806	0.0723	3.1100e- 003	0.0754	0.0000	167.3956	167.3956	0.0541	0.0000	168.7490

### Mitigated Construction Off-Site

	ROG	NOx	со	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

# 3.3 Site Preparation - 2022

## Unmitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/yr		
Fugitive Dust					0.2272	0.0000	0.2272	0.1047	0.0000	0.1047	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0403	0.4375	0.2405	5.2000e- 004		0.0197	0.0197		0.0182	0.0182	0.0000	45.6518	45.6518	0.0148	0.0000	46.0209
Total	0.0403	0.4375	0.2405	5.2000e- 004	0.2272	0.0197	0.2469	0.1047	0.0182	0.1229	0.0000	45.6518	45.6518	0.0148	0.0000	46.0209

### **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

### Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Fugitive Dust					0.0886	0.0000	0.0886	0.0204	0.0000	0.0204	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.3300e- 003	0.1609	0.3069	5.2000e- 004		8.5000e- 004	8.5000e- 004		8.5000e- 004	8.5000e- 004	0.0000	45.6517	45.6517	0.0148	0.0000	46.0208
Total	9.3300e- 003	0.1609	0.3069	5.2000e- 004	0.0886	8.5000e- 004	0.0895	0.0204	8.5000e- 004	0.0213	0.0000	45.6517	45.6517	0.0148	0.0000	46.0208

## Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

### 3.4 Grading - 2022

## **Unmitigated Construction On-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							МТ	/yr		
Fugitive Dust					0.2232	0.0000	0.2232	0.0933	0.0000	0.0933	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Off-Road	0.1727	1.6860	1.8198	3.2900e- 003		0.0765	0.0765		0.0716	0.0716			287.8479	0.0777	0.0000	289.7891
Total	0.1727	1.6860	1.8198	3.2900e- 003	0.2232	0.0765	0.2996	0.0933	0.0716	0.1649	0.0000	287.8479	287.8479	0.0777	0.0000	289.7891

## **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Fugitive Dust					0.0870	0.0000	0.0870	0.0182	0.0000	0.0182	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0516	1.2516	2.2189	3.2900e- 003		5.1800e- 003	5.1800e- 003		5.1800e- 003	5.1800e- 003	0.0000	287.8476	287.8476	0.0777	0.0000	289.7887
Total	0.0516	1.2516	2.2189	3.2900e- 003	0.0870	5.1800e- 003	0.0922	0.0182	5.1800e- 003	0.0234	0.0000	287.8476	287.8476	0.0777	0.0000	289.7887

## Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

# 3.5 Trenching/Foundation - 2022

**Unmitigated Construction On-Site** 

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Off-Road	0.0430	0.4154	0.6233	9.2000e- 004		0.0216	0.0216		0.0199	0.0199	0.0000	80.4663	80.4663	0.0260	0.0000	81.1169
Total	0.0430	0.4154	0.6233	9.2000e- 004		0.0216	0.0216		0.0199	0.0199	0.0000	80.4663	80.4663	0.0260	0.0000	81.1169

## **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

### Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/yr		
Off-Road	0.0165	0.4011	0.6920	9.2000e- 004		1.5000e- 003	1.5000e- 003		1.5000e- 003	1.5000e- 003	0.0000	80.4662	80.4662	0.0260	0.0000	81.1168
Total	0.0165	0.4011	0.6920	9.2000e- 004		1.5000e- 003	1.5000e- 003		1.5000e- 003	1.5000e- 003	0.0000	80.4662	80.4662	0.0260	0.0000	81.1168

## Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

## 3.6 Building Construction - 2022 <u>Unmitigated Construction On-Site</u>

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Off-Road	0.1217	1.2783	0.9044	1.9000e- 003		0.0597	0.0597		0.0550	0.0550	0.0000	166.4016	166.4016	0.0527	0.0000	167.7186
Total	0.1217	1.2783	0.9044	1.9000e- 003		0.0597	0.0597		0.0550	0.0550	0.0000	166.4016	166.4016	0.0527	0.0000	167.7186

## **Unmitigated Construction Off-Site**

	ROG	NOx	со	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

### Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/уг		
Off-Road	0.0352	0.6340	1.1607	1.9000e- 003		3.9000e- 003	3.9000e- 003		3.9000e- 003	3.9000e- 003	0.0000	166.4014	166.4014	0.0527	0.0000	167.7184
Total	0.0352	0.6340	1.1607	1.9000e- 003		3.9000e- 003	3.9000e- 003		3.9000e- 003	3.9000e- 003	0.0000	166.4014	166.4014	0.0527	0.0000	167.7184

## Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e		
Category	tons/yr										MT/yr							
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		

## 3.6 Building Construction - 2023 <u>Unmitigated Construction On-Site</u>

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e		
Category	tons/yr										MT/yr							
Off-Road	0.1546	1.5929	1.2136	2.5900e- 003		0.0723	0.0723		0.0667	0.0667	0.0000	226.9671	226.9671	0.0718	0.0000	228.7619		
Total	0.1546	1.5929	1.2136	2.5900e- 003		0.0723	0.0723		0.0667	0.0667	0.0000	226.9671	226.9671	0.0718	0.0000	228.7619		

## Unmitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e			
Category	tons/yr											MT/yr							
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			

### Mitigated Construction On-Site

ROG	NOx	CO	SO2	Fugitive	Exhaust	PM10	Fugitive	Exhaust	PM2.5	Bio- CO2	NBio-	Total CO2	CH4	N2O	CO2e
				PM10	PM10	Total	PM2.5	PM2.5	Total		CO2				

Category					tons	:/yr						MT	/yr		
Off-Road	0.0479	0.8645	1.5828	2.5900e- 003		5.3100e- 003	5.3100e- 003	5.3100e- 003	5.3100e- 003	0.0000	226.9668	226.9668	0.0718	0.0000	228.7616
Total	0.0479	0.8645	1.5828	2.5900e- 003		5.3100e- 003	5.3100e- 003	5.3100e- 003	5.3100e- 003	0.0000	226.9668	226.9668	0.0718	0.0000	228.7616

#### Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

#### 3.7 Architectural Coating - 2022

**Unmitigated Construction On-Site** 

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	i/yr							MT	/yr		
Archit. Coating	1.4326					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0957	0.7196	0.9992	1.6200e- 003		0.0374	0.0374		0.0373	0.0373	0.0000	139.4086	139.4086	0.0165	0.0000	139.8213
Total	1.5283	0.7196	0.9992	1.6200e- 003		0.0374	0.0374		0.0373	0.0373	0.0000	139.4086	139.4086	0.0165	0.0000	139.8213

#### **Unmitigated Construction Off-Site**

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

#### Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Archit. Coating	1.4326					0.0000			0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0317	0.6433		1.6200e- 003		9.2400e- 003	9.2400e- 003		9.2400e- 003	9.2400e- 003	0.0000	139.4085	139.4085	0.0165	0.0000	139.8211
Total	1.4643	0.6433	1.0426	1.6200e- 003		9.2400e- 003	9.2400e- 003		9.2400e- 003	9.2400e- 003	0.0000	139.4085	139.4085	0.0165	0.0000	139.8211

#### Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

#### 3.7 Architectural Coating - 2023 <u>Unmitigated Construction On-Site</u>

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Archit. Coating	4.2979					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.2694	2.0058	2.9933	4.8500e- 003		0.0975	0.0975		0.0970	0.0970			418.2258			419.4201
Total	4.5673	2.0058	2.9933	4.8500e- 003		0.0975	0.0975		0.0970	0.0970	0.0000	418.2258	418.2258	0.0478	0.0000	419.4201

#### Unmitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

#### Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Archit. Coating	4.2979					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0950	1.9299	3.1277	4.8500e- 003		0.0277	0.0277		0.0277	0.0277	0.0000	418.2253	418.2253	0.0478	0.0000	419.4196
Total	4.3929	1.9299	3.1277	4.8500e- 003		0.0277	0.0277		0.0277	0.0277	0.0000	418.2253	418.2253	0.0478	0.0000	419.4196

#### Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
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	;;	:					:	:		:			:	:		i
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
																i
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
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#### 3.8 Paving - 2023

#### **Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	:/yr							MT	/уг		
Off-Road	0.0106	0.0977	0.1324	2.1000e- 004		4.7400e- 003	4.7400e- 003		4.4000e- 003	4.4000e- 003	0.0000	18.0167	18.0167	5.4700e- 003	0.0000	18.1535
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0106	0.0977	0.1324	2.1000e- 004		4.7400e- 003	4.7400e- 003		4.4000e- 003	4.4000e- 003	0.0000	18.0167	18.0167	5.4700e- 003	0.0000	18.1535

#### Unmitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

#### Mitigated Construction On-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	i/yr							MT	/yr		
Off-Road	2.9500e- 003	0.0821	0.1416	2.1000e- 004		3.1000e- 004	004		3.1000e- 004	004		18.0166	18.0166	5.4700e- 003		18.1535
Paving	0.0000						0.0000		0.0000		0.0000			0.0000	0.0000	0.0000
Total	2.9500e- 003	0.0821	0.1416	2.1000e- 004		3.1000e- 004	3.1000e- 004		3.1000e- 004	3.1000e- 004	0.0000	18.0166	18.0166	5.4700e- 003	0.0000	18.1535

#### Mitigated Construction Off-Site

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/уг		
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

#### 4.0 Operational Detail - Mobile

#### 4.1 Mitigation Measures Mobile

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	i/yr							MT	/yr		
Mitigated	2.8798	3.8449	19.8519	0.0512	5.4626	0.0425	5.5050	1.4615	0.0397	1.5011		0	5,021.807 0		0.0000	5,028.266 6
Unmitigated	2.8798	3.8449	19.8519	0.0512	5.4626	0.0425	5.5050	1.4615	0.0397	1.5011	0.0000	5,021.807 0	5,021.807 0	0.2584	0.0000	5,028.266 6

#### 4.2 Trip Summary Information

	Aver	age Daily Trip F	Rate	Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Mid Rise	1,116.80	1,075.20	985.60	2,522,355	2,522,355
City Park	0.00	0.00	0.00		
Condo/Townhouse	122.50	119.50	102.00	275,173	275,173
Enclosed Parking with Elevator	0.00	0.00	0.00		
General Office Building	1,254.40	280.00	120.00	2,277,776	2,277,776
High Turnover (Sit Down Restaurant)	3,597.30	4,480.56	3730.02	4,342,220	4,342,220
Hotel	2,203.40	1,587.00	1605.40	3,856,697	3,856,697
Other Non-Asphalt Surfaces	0.00	0.00	0.00		
Parking Lot	0.00	0.00	0.00		
Single Family Housing	291.06	302.82	263.62	667,061	667,061
Strip Mall	537.48	509.94	247.86	757,960	757,960
Total	9,122.94	8,355.02	7,054.50	14,699,242	14,699,242

#### 4.3 Trip Type Information

		Miles			Trip %			Trip Purpos	e %
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Mid Rise	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
City Park	9.50	7.30	7.30	33.00	48.00	19.00	66	28	6
Condo/Townhouse	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Enclosed Parking with Elevator	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
General Office Building	9.50	7.30	7.30	33.00	48.00	19.00	77	19	4
High Turnover (Sit Down	9.50	7.30	7.30	8.50	72.50	19.00	37	20	43
Hotel	9.50	7.30	7.30	19.40	61.60	19.00	58	38	4
Other Non-Asphalt Surfaces	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Single Family Housing	10.80	4.80	5.70	31.00	15.00	54.00	86	11	3
Strip Mall	9.50	7.30	7.30	16.60	64.40	19.00	45	40	15

#### 4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Mid Rise	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
City Park	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Condo/Townhouse	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Enclosed Parking with Elevator	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
General Office Building	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
High Turnover (Sit Down	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Hotel	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Other Non-Asphalt Surfaces	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Parking Lot	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Single Family Housing	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752
Strip Mall	0.591953	0.053004	0.176619	0.106733	0.020956	0.005303	0.013483	0.022364	0.001589	0.001248	0.005076	0.000920	0.000752

#### 5.0 Energy Detail

Historical Energy Use: N

#### 5.1 Mitigation Measures Energy

Percent of Electricity Use Generated with Renewable Energy

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	/yr							MT	/yr		
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000			992.2344			1,004.108 2
NaturalGas Mitigated	0.0516	0.4687	0.3937	2.8100e- 003		0.0356	0.0356		0.0356	0.0356	0.0000	510.2052	510.2052	9.7800e- 003	9.3500e- 003	513.2371
NaturalGas Unmitigated	0.0516	0.4687	0.3937	2.8100e- 003		0.0356	0.0356		0.0356	0.0356	0.0000	510.2052	510.2052	9.7800e- 003	9.3500e- 003	513.2371

#### 5.2 Energy by Land Use - NaturalGas

#### **Unmitigated**

	NaturalGa s Use	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr					ton	s/yr							Mī	Г/уг		
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Condo/Townhous e	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Enclosed Parking with Elevator		0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
General Office Building	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	8.73096e+		0.4280	0.3595	2.5700e- 003		0.0325	0.0325		0.0325	0.0325	0.0000			8.9300e- 003		468.6860
Hotel	787265	4.2500e- 003	0.0386	0.0324	2.3000e- 004		2.9300e- 003	2.9300e- 003		2.9300e- 003	2.9300e- 003	0.0000	42.0115	42.0115	8.1000e- 004	7.7000e- 004	42.2611
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Strip Mall	42660	2.3000e- 004	2.0900e- 003	1.7600e- 003	1.0000e- 005		1.6000e- 004	1.6000e- 004		1.6000e- 004	1.6000e- 004	0.0000	2.2765	2.2765	4.0000e- 005	4.0000e- 005	2.2900
Total		0.0516	0.4687	0.3937	2.8100e- 003		0.0356	0.0356		0.0356	0.0356	0.0000	510.2052	510.2052	9.7800e- 003	9.3500e- 003	513.2371

#### Mitigated

	NaturalGa s Use	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr					ton	s/yr							М	Г/уг		
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
City Park	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Condo/Townhous e	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
General Office Building	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)		0.0471	0.4280	0.3595	2.5700e- 003		0.0325	0.0325		0.0325	0.0325	0.0000	465.9173	465.9173	8.9300e- 003	8.5400e- 003	468.6860
Hotel	787265	4.2500e- 003	0.0386	0.0324	2.3000e- 004		2.9300e- 003	2.9300e- 003		2.9300e- 003	2.9300e- 003	0.0000	42.0115	42.0115	8.1000e- 004	7.7000e- 004	42.2611
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Strip Mall	42660	2.3000e- 004	2.0900e- 003	1.7600e- 003	1.0000e- 005		1.6000e- 004	1.6000e- 004		1.6000e- 004	1.6000e- 004	0.0000	2.2765	2.2765	4.0000e- 005	4.0000e- 005	2.2900
Total		0.0516	0.4687	0.3937	2.8100e- 003		0.0356	0.0356		0.0356	0.0356	0.0000	510.2052	510.2052	9.7800e- 003	9.3500e- 003	513.2371

#### 5.3 Energy by Land Use - Electricity <u>Unmitigated</u>

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr		M	Г/уг	
Apartments Mid Rise	1.32188e+ 006	125.9144	0.0174	3.6000e- 003	127.4212
City Park	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhous e	128773	12.2662	1.6900e- 003	3.5000e- 004	12.4130
Enclosed Parking with Elevator	2.8714e+0 06	273.5135	0.0378	7.8100e- 003	276.7865
General Office Building	2.8528e+0 06	271.7418	0.0375	7.7600e- 003	274.9936
High Turnover (Sit Down Restaurant)		130.9024	0.0181	3.7400e- 003	132.4689
Hotel	1.2646e+0 06	120.4584	0.0166	3.4400e- 003	121.8998
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	13720	1.3069	1.8000e- 004	4.0000e- 005	1.3225
Single Family Housing	396854	37.8021	5.2200e- 003	1.0800e- 003	38.2545
Strip Mall	192420	18.3289	2.5300e- 003	5.2000e- 004	18.5482
Total		992.2345	0.1370	0.0283	1,004.108 2

#### Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr		M	Г/уг	
Apartments Mid Rise	0	0.0000	0.0000	0.0000	0.0000
City Park	0	0.0000	0.0000	0.0000	0.0000
Condo/Townhous e	0	0.0000	0.0000	0.0000	0.0000
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
General Office Building	0	0.0000	0.0000	0.0000	0.0000
High Turnover (Sit Down Restaurant)	0	0.0000	0.0000	0.0000	0.0000
Hotel	0	0.0000	0.0000	0.0000	0.0000
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	0	0.0000	0.0000	0.0000	0.0000
Strip Mall	0	0.0000	0.0000	0.0000	0.0000
Total		0.0000	0.0000	0.0000	0.0000

#### 6.0 Area Detail

#### 6.1 Mitigation Measures Area

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category					tons	s/yr							MT	/yr		

Nec		0.0330	2 0435	4.0000		0.0400	0.0400	 0.0400	0.0400			4.0400			4 0333
Mitigated	4.1903	0.0339	2.9435	1.6000e-		0.0163	0.0163	0.0163	0.0163	0.0000	4.8162	4.8162	4.6800e-	0.0000	4.9333
			•	004									003		
	2		: 	: 				 							
Unmitigated	4.1903	0.0339	2.9435	1.6000e-		0.0163	0.0163	0.0163	0.0163	0.0000	4.8162	4.8162	4.6800e-	0.0000	4.9333
			İ	004									003		
					-			-	-	-	-				

#### 6.2 Area by SubCategory

#### <u>Unmitigated</u>

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory					tons	s/yr							MT	/yr		
Architectural Coating	0.5731					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	3.5275					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0897	0.0339	2.9435	1.6000e- 004		0.0163	0.0163		0.0163	0.0163	0.0000	4.8162	4.8162	4.6800e- 003	0.0000	4.9333
Total	4.1903	0.0339	2.9435	1.6000e- 004		0.0163	0.0163		0.0163	0.0163	0.0000	4.8162	4.8162	4.6800e- 003	0.0000	4.9333

#### Mitigated

	ROG	NOx	СО	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr								MT/yr							
Architectural Coating	0.5731					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	3.5275					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0897	0.0339	2.9435	1.6000e- 004		0.0163	0.0163		0.0163	0.0163	0.0000	4.8162	4.8162	4.6800e- 003	0.0000	4.9333
Total	4.1903	0.0339	2.9435	1.6000e- 004		0.0163	0.0163		0.0163	0.0163	0.0000	4.8162	4.8162	4.6800e- 003	0.0000	4.9333

#### 7.0 Water Detail

#### 7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category		MT	/yr	
Mitigated	77.2074	0.0972	0.0584	97.0439
Unmitigated	77.2074	0.0972	0.0584	97.0439

#### 7.2 Water by Land Use Unmitigated

	Indoor/Out door Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal		Mī	Г/уг	
Apartments Mid Rise	20.8493 / 13.1441	22.5048	0.0275	0.0165	28.1009
City Park	0 / 2.69275	0.8977	1.2000e- 004	3.0000e- 005	0.9085

Condo/Townhous e	1.62885 / 1.02688	1.7582	2.1500e- 003	1.2900e- 003	2.1954
Enclosed Parking with Elevator	0/0	0.0000	0.0000	0.0000	0.0000
General Office Building	28.4374 / 17.4294	30.5292	0.0375	0.0225	38.1601
High Turnover (Sit Down Restaurant)		11.3525	0.0165	0.0100	14.7455
Hotel	5.83436 / 0.648262	5.2875	7.5500e- 003	4.5800e- 003	6.8414
Other Non- Asphalt Surfaces	0/0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0/0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	3.19255 / 2.01269	3.4461	4.2100e- 003	2.5200e- 003	4.3030
Strip Mall	1.33331 / 0.817187	1.4314	1.7600e- 003	1.0500e- 003	1.7892
Total		77.2074	0.0972	0.0584	97.0439

#### Mitigated

	Indoor/Out	Total CO2	CH4	N2O	CO2e
	door Use	Total CO2	СП4	N2O	COZe
Land Use	Mgal		M	Γ/yr	
Land OSC	ivigai			,, yı	
Apartments Mid	20.8493 /	22.5048	0.0275	0.0165	28.1009
Rise	13.1441				
City Park	0/	0.8977	1.2000e-	3.0000e-	0.9085
	2.69275		004	005	
Condo/Townhous	1.62885 /	1.7582	2.1500e-	1.2900e-	2.1954
е	1.02688		003	003	
Enclosed Parking	0/0	0.0000	0.0000	0.0000	0.0000
with Elevator					
General Office	28.4374 /	30.5292	0.0375	0.0225	38.1601
Building	17.4294				
High Turnover (Sit	12.7484 /	11.3525	0.0165	0.0100	14.7455
Down Restaurant)					
Hotel	5.83436 /	5.2875	7.5500e-	4.5800e-	6.8414
110101	0.648262	0.2010	003	003	0.0111
Other Non-	0/0	0.0000	0.0000	0.0000	0.0000
Asphalt Surfaces	0,0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0/0	0.0000	0.0000	0.0000	0.0000
r arking Lot	070	0.0000	0.0000	0.0000	0.0000
Single Family	3.19255 /	3.4461	4.2100e-	2.5200e-	4.3030
Housing	2.01269	3.4461	4.2100e- 003	2.5200e- 003	4.3030
					4 7000
Strip Mall	1.33331 / 0.817187	1.4314	1.7600e- 003	1.0500e- 003	1.7892
	0.017107				
Total		77.2074	0.0972	0.0584	97.0439

#### 8.0 Waste Detail

#### 8.1 Mitigation Measures Waste

#### Category/Year

	Total CO2	CH4	N2O	CO2e					
	MT/yr								
Mitigated	205.2462	12.1297	0.0000	508.4888					
Unmitigated	205.2462	12.1297	0.0000	508.4888					

#### 8.2 Waste by Land Use

#### <u>Unmitigated</u>

Land Use	tons	MT/yr						
Apartments Mid Rise	147.2	29.8803	1.7659	0.0000	74.0271			
City Park	0.19	0.0386	2.2800e- 003	0.0000	0.0956			
Condo/Townhous e	11.5	2.3344	0.1380	0.0000	5.7834			
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000			
General Office Building	148.8	30.2051	1.7851	0.0000	74.8318			
High Turnover (Sit Down Restaurant)	499.8	101.4549	5.9958	0.0000	251.3502			
Hotel	125.92	25.5606	1.5106	0.0000	63.3254			
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000			
Parking Lot	0	0.0000	0.0000	0.0000	0.0000			
Single Family Housing	58.8	11.9359	0.7054	0.0000	29.5706			
Strip Mall	18.9	3.8365	0.2267	0.0000	9.5048			
Total		205.2462	12.1297	0.0000	508.4888			

#### Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons		Mī	Γ/yr	
Apartments Mid Rise	147.2	29.8803	1.7659	0.0000	74.0271
City Park	0.19	0.0386	2.2800e- 003	0.0000	0.0956
Condo/Townhous e	11.5	2.3344	0.1380	0.0000	5.7834
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
General Office Building	148.8	30.2051	1.7851	0.0000	74.8318
High Turnover (Sit Down Restaurant)		101.4549	5.9958	0.0000	251.3502
Hotel	125.92	25.5606	1.5106	0.0000	63.3254
Other Non- Asphalt Surfaces	0	0.0000	0.0000	0.0000	0.0000
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Single Family Housing	58.8	11.9359	0.7054	0.0000	29.5706
Strip Mall	18.9	3.8365	0.2267	0.0000	9.5048
Total		205.2462	12.1297	0.0000	508.4888

#### 9.0 Operational Offroad

Equipment Type	Number	Hours/Dav	Davs/Year	Horse Power	Load Factor	Fuel Type
Equipmont Typo	110111201	riodio/ Day	Dayor roan	1101001 01101	2000 / 0010/	. do. 13po

#### 10.0 Stationary Equipment

#### Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

#### **Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

#### <u>User Defined Equipment</u>

Equipment Type Number
-----------------------

#### 11.0 Vegetation

#### ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

#### ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000 SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660 FAX: (650) 589-5062 trengifo@adamsbroadwell.com

July 29, 2022

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350 SACRAMENTO, CA 95814-4721

TEL: (916) 444-6201 FAX: (916) 444-6209

#### Via Email and Overnight Mail

Mayor Liccardo and City Council City of San Jose 200 E. Santa Clara St. San José, CA 95113

Email: city.clerk@sanjoseca.gov

#### Via Email Only

KEVIN T. CARMICHAEL

CHRISTINA M. CARO

THOMAS A. ENSLOW

KELILAH D. FEDERMAN

RICHARD M. FRANCO

ANDREW J. GRAF

TANYA A. GULESSERIAN DARIEN K. KEY

RACHAEL E. KOSS

AIDAN P. MARSHALL

TARA C. RENGIFO MICHAEL R. SEVILLE

Of Counsel MARC D. JOSEPH DANIEL L. CARDOZO

Kara Hawkins, kara.hawkins@sanjoseca.gov

Re: Comments to City Council on the Cambrian Park Mixed-Use Village Project (File Nos. PDC17-040, PD20-007) (SCH No. 2018022034)

Dear Mayor Liccardo and Councilmembers:

We are writing on behalf of Silicon Valley Residents for Responsible Development ("Silicon Valley Residents") regarding the Cambrian Park Mixed-Use Village Project (File No. PDC17-040, PD20-007, CAMBRIAN 37, and SCH No. 2018022034) ("Project"), proposed by Kimo Realty ("Applicant"). The Project site is located at 14200 and 14420 Union Avenue (Assessor's Parcel Numbers ("APNs") 419-08-012 and -013) ("Site").

On July 13, 2022, Silicon Valley Residents urged the Planning Commission to direct Staff to prepare and circulate a revised EIR which adequately analyzes the environmental impacts of the pre-zone, annexation, and other entitlements for the Project. The basis for Silicon Valley Residents' comments was multiple expert analyses that demonstrate the City failed to support its conclusions in the Final Environmental Impact Report ("FEIR") regarding less than significant impacts on public health, noise, transportation, energy use, and water supply with substantial evidence, as required by State law and City Codes. Despite the lack of substantial evidence, the Planning Commission recommended that the City Council certify the FEIR, approve an ordinance to pre-zone the site, and adopt a resolution initiating annexation proceedings. Silicon Valley Residents urges the City Council to rectify 5745-014j

the errors and direct Staff to prepare a revised draft EIR for the reasons set forth below.

In sum, the Project cannot be approved at this time because the City has not conducted the legally required environmental review of the Project pursuant to the California Environmental Quality Act ("CEQA"). The City lacks substantial evidence to support the FEIR's conclusions that impacts will be less than significant and that the mitigation measures adequately reduce impacts. Instead, substantial evidence shows that the Project would have significant impacts on noise, transportation, and public health that are not adequately disclosed or mitigated in the FEIR. The City also failed to sufficiently analyze the significance of energy use impacts and water supply impacts, as required by the City Code and State law, respectively.

## I. The FEIR Lacks Substantial Evidence to Support the Conclusion that the Project's Construction Noise Impacts Would Be Less Than Significant.

The Project's construction noise impacts are underestimated in the FEIR and significant. Our expert determined that the FEIR relied on an inflated existing ambient noise level (i.e., 59 dBA) to calculate whether the Project exceeds the threshold of significance for construction noise impacts.<sup>2</sup> Employing a representative existing ambient noise level (i.e., 51-52 dBA) shows that nearly the entire site would exceed the threshold of significance for construction noise impacts.<sup>3</sup> Notably, our expert concluded that the residents at Bercaw Lane will be significantly impacted by construction noise during that first year, at least.<sup>4</sup>

<sup>&</sup>lt;sup>1</sup> Silicon Valley Residents submitted comments on the Project's Draft Environmental Impact Report ("DEIR") dated January 3, 2022, and to the Planning Commission dated July 13, 2022, that demonstrate the FEIR's public health, noise, transportation, energy use, land use, and water supply analyses remain substantially inaccurate and incomplete. We prepared our comments with the assistance of technical experts, including air quality, GHG emissions, and health risk assessment experts; a traffic and transportation expert; and a noise expert.

<sup>&</sup>lt;sup>2</sup> Comments by Derek Watry on the Cambrian Park Mixed-Use Village Project Final EIR at 4 (July 12, 2022) (hereinafter, "Watry Comments").

<sup>&</sup>lt;sup>3</sup> *Id*. at 6.

<sup>&</sup>lt;sup>4</sup> *Id*.

Moreover, the proposed mitigation measures to reduce impacts from construction noise on nearby residential and commercial land uses (i.e., construction hours, equipment, idling and staging areas, noise barriers) are inadequate to reduce construction noise levels to below the threshold of significance.<sup>5</sup>

## II. The FEIR Lacks Substantial Evidence to Support the Conclusion that the Project's Transportation Impacts Would Be Less Than Significant.

The City's conclusion that the Project would not result in new net Vehicle Miles Traveled ("VMT") is unsupported. The City estimated that the Project would result in 8.96 residential per capita VMT, which is approximately 24.8 percent below the VMT rate in the immediate area, and 12.01 per employee for employment-based VMT generation, which is about 16.4 percent less than the rate in the broader area. For residential VMT, transportation expert Daniel T. Smith Jr., P.E. determined that pedestrian enhancement measures may reduce VMT by 0.625 percent but found the FEIR's conclusion that trip internalization would reduce VMT by 24.18 percent to be implausible.<sup>6</sup> Mr. Smith also explained that the Project's employment-based VMT estimation is dependent on an extremely high percentage of Project residents from a very small number of households to fill the jobs within the Project site—an assumption that is entirely unsupported by substantial evidence. In addition, the City's analysis of VMT for the Project's hotel, retail, and restaurant components is based on an unsupported assumption that trips would be diverted from similar, existing establishments, rather than new trips to the Project site.8 Finally, the FEIR ignores vehicle trips from Los Gatos and other nearby areas that will add to cumulative impacts – all without adequate mitigation.9

<sup>&</sup>lt;sup>5</sup> *Id*. at 8.

<sup>&</sup>lt;sup>6</sup> Comments by Daniel Smith on the Cambrian Park Mixed-Use Village Project Final EIR at 1 (July 13, 2022) (hereinafter, "Smith Comments").

<sup>&</sup>lt;sup>7</sup> *Id.* at 2.

<sup>&</sup>lt;sup>8</sup> *Id*. at 3.

<sup>&</sup>lt;sup>9</sup> *Id*. at 7.

<sup>5745-014</sup>j

### III. The FEIR Lacks Substantial Evidence to Support the Conclusion that the Project's Public Health Impacts Would Be Less Than Significant.

The City's health risk assessment fails to adequately evaluate the significant health risk impacts associated with Project construction and operation because the analysis relies on an underestimated Diesel Particulate Matter ("DPM") concentration. The Project's PM10 emissions were calculated to include Tier 4 Final equipment as mitigation even though less stringent Tier 4 Interim equipment will be used. As demonstrated in SWAPE's comments to the Planning Commission, the difference between PM10 emissions from Tier 4 Interim and Tier 4 Final equipment is substantial and likely resulted in an underestimation of DPM emissions. <sup>10</sup> As a result, the determination that the mitigated excess cancer risk would not exceed the significance threshold is unsupported by substantial evidence and the City cannot certify the FEIR.

Moreover, the Project's diesel generators would result in a cancer risk of 0.46 in one million. The mitigated cancer risk from construction and operation of the Project disclosed in the FEIR was approximately 8.48 cases per million, which is only slightly below the BAAQMD significance threshold of 10 cases per million. When coupled with the higher DPM emission rate and cancer risk, our expert concluded that the Project may result in a significant, undisclosed health risk impact. Thus, the FEIR's conclusion that the Project would not result in a significant health risk during construction is not supported by substantial evidence, as required by State law, and the City cannot certify the FEIR and approve the Project-related pre-zone ordinance and annexation resolution until the EIR is revised to ensure that health impacts are adequately evaluated, disclosed, and mitigated.

 $<sup>^{10}</sup>$  Comments by SWAPE on the Cambrian Park Mixed-Use Village Project Final EIR at 2-3 (July 12, 2022) (hereinafter, "SWAPE Comments").

<sup>&</sup>lt;sup>11</sup> *Id*. at 3.

## IV. The FEIR Lacks Substantial Evidence to Support the Conclusion that the Project's Energy Use Impacts Would Be Less Than Significant and the City Failed to Comply with the Reach Code.

The City's analysis of natural gas and electricity usage does not evaluate energy impacts in compliance with the City's mandatory requirements under its Reach Code. The City must disclose the Project's energy mix and usage based on what is actually required by the City's policies and ordinances. In addition, the FEIR's claim that the Project's energy use impacts would be less than significant due to the Project's compliance with the Reach Code is unsupported, since the City did not actually evaluate energy impacts as required by the Reach Code. The City's lack of substantial evidence and circular arguments with no support are insufficient bases to certify the FEIR and approve the Project under both State and local law.

### V. The FEIR Lacks Substantial Evidence to Support the Conclusion that the Water Supply Impacts Would Be Less Than Significant.

The City acknowledged that there would be insufficient water supplies to meet the water demand of the Project during future dry years. This is a significant impact under CEQA. Yet, the City dismisses water supply impacts as less than significant with the implementation of conservation measures, without actually analyzing the feasibility and effectiveness of these conservation measures to reduce water demand during dry years. The City's failure to include an analysis of whether the conservation measures would reduce this significant impact, and failure to require mitigation ensuring such conservation measures are implemented (should the analysis show they are effective), results in a failure to disclose the information to the public and violates CEQA.

In sum, multiple expert analyses provided evidence that the City failed to support its conclusions regarding less than significant impacts on public health, noise, transportation, energy use, and water supply with substantial evidence, as required by State law and City Codes. For the reasons stated herein, Silicon Valley Residents urges the City Council to direct Staff to revise and recirculate the EIR for public review.

# VI. The Project Fails to Comply with Signature Project Policy IP-5.10 Because the Staff Report Relies on a Larger Sized Development to Claim More Jobs Even Though the Larger Project is Not Evaluated in the FEIR.

The Project cannot be approved until the Project meets all requirements to qualify as a Signature Project under the City's General Plan Policy IP-5.10, which it does not because the Project does not provide enough new jobs, as required by the Signature Project Policy. The City claims that the Project must provide at least 910 new jobs, but the FEIR states that the Project would only add up to 200 jobs under the Assisted Living Variant and 730 jobs under the Office Variant, both of which are less than the required 910 jobs (assuming one worker per 300 square feet of commercial/retail space provided). In analyzing consistency with the Policy, the Staff Report artificially inflates the Project's square footage, which, if accurate, the City failed to evaluate in the FEIR. The City cannot have it both ways. Either the Project is the smaller development scenarios evaluated in the FEIR and does not comply with Policy IP-5.10 or the Project is the larger development stated in the Staff Report, as the alleged basis for the greater number of jobs created, which the FEIR improperly failed to evaluate.

### VII. The Project is Inconsistent with the General Plan and the City Cannot Make the Findings to Approve the Annexation.

The Project is inconsistent with General Plan policies governing transitoriented development, recycled water use, and air quality policies limiting site grading. For example, Policy FS-4.7 encourages transit-oriented development. The Project site is in a Commercial Corridor and Center Urban Village, which the General Plan describes as being "less directly connected to transit than other Growth Areas," and "recogniz[es] that transit-oriented sites should be given more priority for accommodating new growth." The annexation proposal will also not support the location of new development within the vicinity of a recycled water system, as encouraged by Policy MS-17.2. To approve the annexation proposal, State law requires the City Council to find that the proposal is consistent with the City's General Plan. Given the policy inconsistencies identified above, the City lacks substantial evidence to support this finding for the Project and the City Council must therefore deny the annexation proposal.

 $<sup>^{12}</sup>$  Staff Report at 5; FSEIR at 112. 5745-014j

In conclusion, the City lacks substantial evidence to supports its conclusions in the FEIR, as set forth above, and in our detailed comments submitted to the City, which are incorporated herein. In addition, the City lacks evidence to show the Project complies with the Reach Code, Signature Policy, and General Plan policies. The City cannot certify the FEIR and cannot approve the Project until the issues raised in these comments, our prior detailed comments submitted to the City, and in the comments of other members of the public and responsible agencies, have been addressed in a revised and recirculated EIR and revised Staff analysis.

Tara C. Regiso

Tara C. Rengifo Associate Attorney

TCR:ljl

From: Caryn Graves
To: Meiners, Laura

**Subject:** Support Cambrian Village!

**Date:** Wednesday, July 13, 2022 2:49:27 PM

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[External Email]

City Planner Laura Meiners,

I write in strong support the San Jose Cambrian Village project. Cambrian village accomplishes the stated goals of the City of San Jose in a way very few other projects do. The proposal will activate and enhance retail as well as, 18 acres of surface parking with 428 much-needed new homes, including 30 affordable homes and \$9 million in in-lieu fees for San Jose residents who need them the most. The City of San Jose is suffering from our shared housing shortage, which is driving a displacement and affordability crisis. To solve it, we need projects like Cambrian Village that can deliver homes for people in resource-rich areas that will serve residents. I urge you to move this project forward.

In addition to the urgently-needed housing, the project also delivers a number of strong community benefits including:

- Cambrian Village will deliver an abundant public green space and plaza to be used for community activation and resident use.
- The project will include commercial retail space for small-businesses to thrive in a unique public plaza surrounded by commercial shops creating a heart for the neighborhood.
- The infrastructure improvements will contain 229 new bike parking spaces along with raised bike lanes along Union Ave and Camden Ave encouraging the use of green transit options.
- The development team has worked with the community for five years to envision and design the Cambrian Village and has gone through multiple design changes as a result of community input and thus addressing and including the communities desires and concerns for the project.

Cambrian Village is an important project proposal that has earned the support of the Housing Action Coalition, many residents of the neighborhood, and the City of San Jose not only because of its promise to deliver mixed-income housing, but also because of it's robust community benefits. I urge you to move the project forward.



From: Jennifer Michel
To: Meiners, Laura

**Subject:** Support Cambrian Village!

**Date:** Wednesday, July 13, 2022 5:04:47 PM

[External Email]

#### City Planner Laura Meiners,

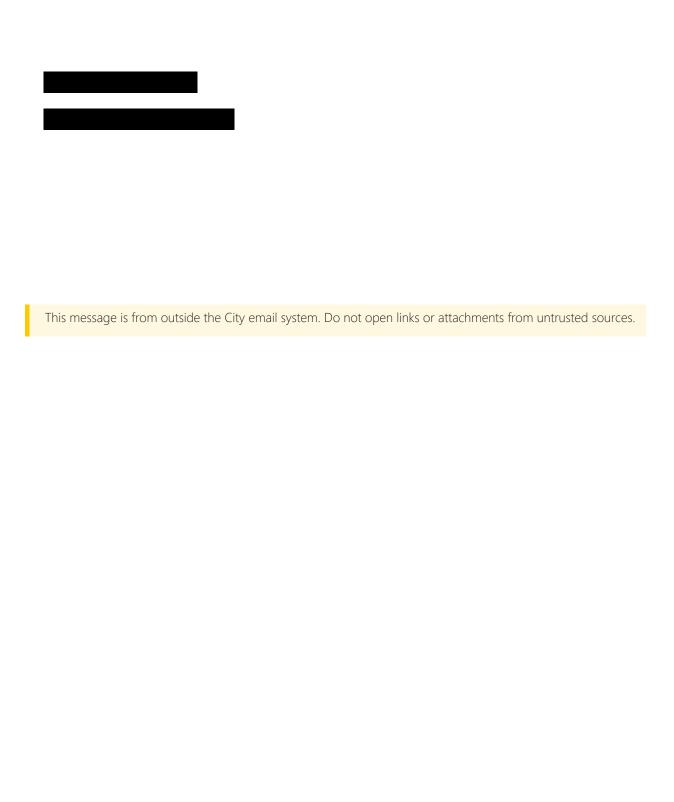
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Jennifer Michel



From:
To: Meiners, Laura

Subject: Support Cambrian Village!

Date: Wednesday, July 13, 2022 2:24:06 PM

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#### City Planner Laura Meiners,

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From: <u>Justin Gee</u>
To: <u>Meiners, Laura</u>

**Subject:** Support Cambrian Village!

**Date:** Thursday, July 14, 2022 12:44:46 AM

[External Email]

#### City Planner Laura Meiners,

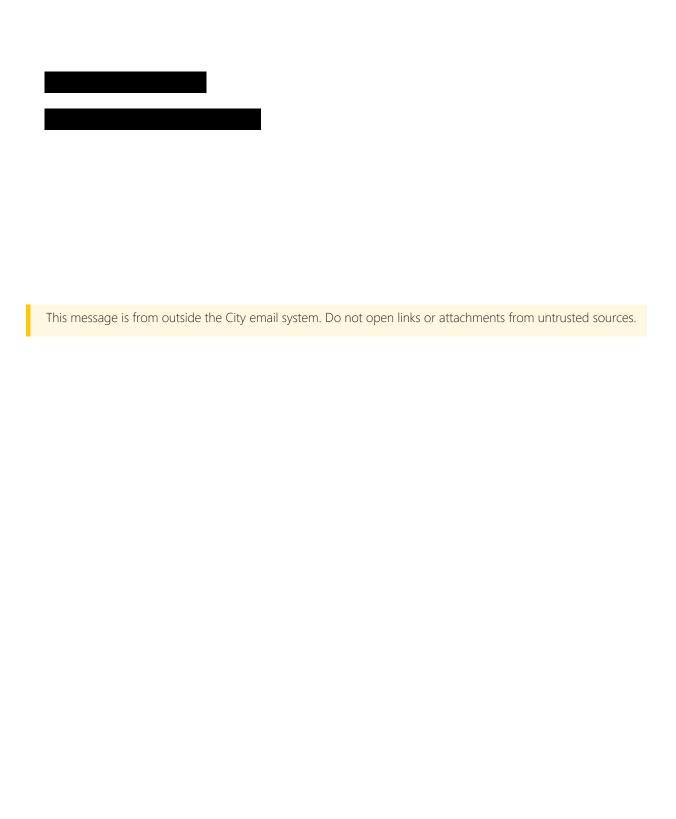
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Justin Gee



From: <u>Dave Stratman</u>

To: <u>Meiners, Laura; Lomio, Michael</u>

Subject: Cambrian Park Plaza

**Date:** Thursday, July 14, 2022 11:52:41 AM

[External Email]

#### Hi Laura,

Thank you for your work with the developers to get the plaza annexation through the planning commission yesterday. This has been a very slow process and we're excited for this step and to be able to hopefully take advantage of the newly developed plaza sooner than later!

As you continue working with them to tweak the plans and move towards actual construction I'd recommend the following items be considered:

- Restrict the "New Public Street" toward the back of the property into two sections
  - Pragmatically the city will need a way to avoid this becoming a cut through for commute traffic.
  - Emergency fire/medical could pass through as could city utilities (trash/recycling), but normal cars should not be allowed past the halfway point.
  - Potentially some angled curb up onto a half grass, half pavers checkerboard section of the road with signage and/or flexible bollares marking the restrictions.
  - This would critically make it much safer for kids moving between the central grass area and the playground next to Wyrick.
- Require first floor retail in all major buildings, not just the apartments in building 1.
  - For more of a true downtown mainstreet feel on "Main Street", both the hotel (building 2) & assisted living (building 3) on the other side of the street should have retail on the 1st floor facing building 1.
  - It seems the current plan only recommends/requires this in building 1. We would welcome this change even if the buildings were raised a level to accommodate.
- Provide some "playable" artwork in the central plaza
  - We love the idea of outdoor eating and drinking for families!
  - Being able to sit outside and allow children to play within viewing distance would be a great addition that allows more of an adult vibe to the restaurants while still welcoming families with kids (the playground is too far aways and currently requires crossing a street; see above)
  - For some great local examples of art/play fusion see the Pruneyard Gorrilla climbing sculptures or Santana Row's chess board and Valencia plazas.

Overall the second incarnation of the redesign hits much closer to the mark of what the community is looking for and we're very encouraged by it. Our family is looking forward to spending our tax dollars here instead of just Campbell and Los Gatos as so many of us do today.

(I'm copying Michael from Pam Foley's office as he's been historically involved in helping

provide community feedback to the developers).

Thanks,

-Dave Stratman

 From:
 PlanningSupportStaff

 To:
 Mitre, Betty

 Cc:
 Meiners, Laura

**Subject:** FW: Please Approve the Cambrian Village Signature Project

**Date:** Friday, July 22, 2022 8:51:00 AM

----Original Message-----

From: City Clerk <city.clerk@sanjoseca.gov> Sent: Thursday, July 21, 2022 3:19 PM

To: PlanningSupportStaff < PlanningSupportStaff@sanjoseca.gov > Subject: FW: Please Approve the Cambrian Village Signature Project

----Original Message----

From: Gavin Hayes

Sent: Thursday, July 21, 2022 12:21 PM
To: City Clerk <city.clerk@sanjoseca.gov>

Cc: laura.meiners@sanjose.ca; info@cambrianvillage.com Subject: Please Approve the Cambrian Village Signature Project

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Dear Councilmembers,

I live near Cambrian Park Plaza and am a long-time supporter of the Cambrian Village mixed-use redevelopment plan for the site.

I am writing to urge you to approve the Cambrian Village plan. Cambrian Village will revitalize this site and bring incredible community benefits to District 9 that are long overdue for the neighborhood.

Cambrian Village has taken years to plan, and it reflects what the community wants.

Please approve this Signature Project without delay.

Sincerely,

Gavin Hayes



From: <u>Eugene Li</u>
To: <u>City Clerk</u>

Cc: Meiners, Laura; info@cambrianvillage.com

Subject: Please Approve the Cambrian Village Signature Project

**Date:** Thursday, July 21, 2022 12:47:48 PM

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Dear Councilmembers,

I am a resident of San Jose, I live near Cambrian Park Plaza and am a long-time supporter of the Cambrian Village mixed-use redevelopment plan for the site.

I am writing to urge you to approve the Cambrian Village plan. Cambrian Village will revitalize this site and bring incredible community benefits to District 9 that are long overdue for the neighborhood.

Cambrian Village has taken years to plan, and it reflects what the community wants.

Please approve this Signature Project without delay.

Sincerely,

Eugene Li

From: Carl Norum
To: City Clerk

Cc: Meiners, Laura; info@cambrianvillage.com

**Subject:** Please Approve the Cambrian Village Signature Project

**Date:** Thursday, July 21, 2022 10:58:23 AM

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[External Email]

Dear Planning Commissioners,

I am a resident of Cambrian Park - I live just a block or so away from the plaza and am a long-time supporter of the Cambrian Village mixed-use redevelopment plan for the site. The existing retail has been under-utilized and terrible for years, and we really need to have the denser housing and improved outdoor space, too.

Cambrian Village will revitalize this site and bring incredible community benefits to District 9 that are long overdue for the neighborhood. I know there are a lot of vocal NIMBYs who want to stop any reasonable progress at any cost, but we can't keep placating them forever. Let's make our neighbourhood and city a brighter, better, place to live.

Please approve this project!

--

Carl Norum

From: John Radle
To: City Clerk

Cc: Meiners, Laura; info@cambrianvillage.com

Subject: Please Approve the Cambrian Village Signature Project

Date: Thursday, July 21, 2022 4:10:32 PM

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[External Email]

Dear Councilmembers,

I am a resident of San Jose, I live near Cambrian Park Plaza and am a long-time supporter of the Cambrian Village mixed-use redevelopment plan for the site.

I am writing to urge you to approve the Cambrian Village plan. Cambrian Village will revitalize this site and bring incredible community benefits to District 9 that are long overdue for the neighborhood.

Cambrian Village has taken years to plan, and it reflects what the community wants.

Please approve this Signature Project without delay.

Sincerely,

Johney Radle

Sent via the Samsung Galaxy S21 5G, an AT&T 5G smartphone Get Outlook for Android

From: Nitin Saini
To: City Clerk

Cc: Meiners, Laura; info@cambrianvillage.com

Subject: Please Approve the Cambrian Village Signature Project

Date: Thursday, July 21, 2022 1:06:40 PM

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[External Email]

Dear Councilmembers,

I am a resident of San Jose, I live near Cambrian Park Plaza and am a long-time supporter of the Cambrian Village mixed-use redevelopment plan for the site.

I am writing to urge you to approve the Cambrian Village plan. Cambrian Village will revitalize this site and bring incredible community benefits to District 9 that are long overdue for the neighborhood.

Cambrian Village has taken years to plan, and it reflects what the community wants.

Please approve this Signature Project without delay.

Sincerely,

Nitin

From: <u>Claire Shifren</u>
To: <u>City Clerk</u>

Cc: Meiners, Laura; info@cambrianvillage.com

Subject: Please Approve the Cambrian Village Signature Project

Date: Thursday, July 21, 2022 3:42:23 PM

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Dear Councilmembers,

As a resident of San Jose, I live near the Cambrian Park Plaza and am supporting of the Cambrian Village mixed-use redevelopment plan.

I do urge you to approve the Cambrian Village plans. This site is long overdue for revitalization and better space usage. It will bring incredible community benefits to District 9 that are long overdue for the neighborhood.

Cambrian Village has taken years to plan, and it reflects what the community wants.

Please approve this Signature Project.

Sincerely,

Claire Shifren

 From:
 PlanningSupportStaff

 To:
 Mitre, Betty

 Cc:
 Meiners, Laura

Subject: FW: Please Approve the Cambrian Village Signature Project

Date: Friday, July 22, 2022 8:51:40 AM

From: City Clerk <city.clerk@sanjoseca.gov>

Sent: Friday, July 22, 2022 7:27 AM

**To:** PlanningSupportStaff < PlanningSupportStaff@sanjoseca.gov> **Subject:** FW: Please Approve the Cambrian Village Signature Project

From: odded solomon <

**Sent:** Thursday, July 21, 2022 4:35 PM **To:** City Clerk < city.clerk@sanjoseca.gov >

Subject: Please Approve the Cambrian Village Signature Project

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[External Email]

Dear Councilmembers,

I am a resident of San Jose, I live near Cambrian Park Plaza and am a long-time supporter of the Cambrian Village mixed-use redevelopment plan for the site.

I am writing to urge you to approve the Cambrian Village plan. Cambrian Village will revitalize this site and bring incredible community benefits to District 9 that are long overdue for the neighborhood.

Cambrian Village has taken years to plan, and it reflects what the community wants.

Please approve this Signature Project without delay.

Sincerely,

**Odded Solomon** 

### /Odded

From: Mike Wittig
To: City Clerk

Cc: Meiners, Laura; info@cambrianvillage.com

Subject: Please Approve the Cambrian Village Signature Project

Date: Thursday, July 21, 2022 12:16:11 PM

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[External Email]

Dear Councilmembers,

I am a resident of San Jose, I live near Cambrian Park Plaza and am a long-time supporter of the Cambrian Village mixed-use redevelopment plan for the site.

I am writing to urge you to approve the Cambrian Village plan. Cambrian Village will revitalize this site and bring incredible community benefits to District 9 that are long overdue for the neighborhood.

Cambrian Village has taken years to plan, and it reflects what the community wants.

Please approve this Signature Project without delay.

Sincerely,

Mike Wittig

From: Ragh B
To: City Clerk

Cc: Meiners, Laura; info@cambrianvillage.com

Subject: Please Approve the Cambrian Village Signature Project

**Date:** Friday, July 22, 2022 11:58:56 PM

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[External Email]

Dear Councilmembers,

I am a resident of San Jose, I live near Cambrian Park Plaza and am a long-time supporter of the Cambrian Village mixed-use redevelopment plan for the site.

I am writing to urge you to approve the Cambrian Village plan. Cambrian Village will revitalize this site and bring incredible community benefits to District 9 that are long overdue for the neighborhood.

Cambrian Village has taken years to plan, and it reflects what the community wants.

Please approve this Signature Project without delay.

Sincerely,

[Ragh B]

From: Aletta Godden
To: City Clerk

Cc: Meiners, Laura; info@cambrianvillage.com

Subject: Please Approve the Cambrian Village Signature Project

**Date:** Thursday, July 28, 2022 5:54:38 AM

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[External Email]

Dear Councilmembers,

I am a resident of San Jose, I live near Cambrian Park Plaza and am a long-time supporter of the Cambrian Village mixed-use redevelopment plan for the site.

I am writing to urge you to approve the Cambrian Village plan. Cambrian Village will revitalize this site and bring incredible community benefits to District 9 that are long overdue for the neighborhood.

Cambrian Village has taken years to plan, and it reflects what the community wants.

Please approve this Signature Project without delay.

Kindly, Aletta

Sent from my iPhone

From: Alex Shoor

To: ; Morley, Sean; Ken Rodrigues;

Cc: Meiners, Laura; The Office of Mayor Sam Liccardo; Ferguson, Jerad; District9; Lomio, Michael; Hughes, Scott;

susan.ellenberg@bos.sccgov.org; david.fernandez@bos.sccgov.org; Sahid, Robyn; Ho, Nathan;

<Projects@catalyzesv.org>; Brilliot, Michael; Manford, Robert; Burton, Chris;

**Subject:** Re: Catalyze SV Members Evaluate & Score Cambrian Park Village

**Date:** Tuesday, August 2, 2022 10:23:54 AM

[External Email]

Sean, Michael, Tim, & Ken,

Based on Kimco's recent decision to increase the number of 100% AMI units on the Cambrian Village proposal from 15 homes to 30 homes, Catalyze SV's staff invited our members to rescore the Cambrian Village project last week.

Albeit a small change, I'm delighted to inform you that our members increased your project's score on our "Affordability" category from a 2 to a 3! That means your overall score has now increased to a 4 out of 5.

Catalyze SV and our members will continue to advocate for this project to be approved by City Council at its upcoming meeting, while also requesting that Kimco reduce the AMI level of the proposal, ideally to 60% for some or all of the affordable homes.

The Cambrian Village's updated scores are now reflected on our website.

Thank you to Kimco for being responsive to Councilmember Foley and our members' suggestions on the project.

Gratefully, Alex

Alex Shoor

Executive Director, Catalyze SV

www.CatalyzeSV.org

Get Catalyze SV apparel | Schedule time w/Alex

On Mar 11, 2021, at 6:59 PM, Alex Shoor < > wrote:

Tim, Sean, & Ken,

Thanks for presenting Cambrian Park Village to the members of Catalyze SV's Project Advocacy Committee last month. Our members are excited to be involved in this large project that will bring hundreds of homes and a new village center to the Cambrian community. Our members were particularly impressed with the plan's vibrancy, your community engagement efforts thus far, and

the plan's mixed-use walkability.

Please find below the evaluation from <u>Catalyze SV</u>'s Project Advocacy Committee and a feedback form for the project.

- **1)** <u>Scorecard</u>. The project scored well at 3.86 out of 5. This is above Catalyze SV's threshold we can continue to be involved in urging this project to move forward.
- **2)** <u>Letter.</u> We would also like to offer constructive comments on the project that come from our members. Especially with Catalyze SV's suggestions incorporated, we look forward to seeing this project move through the approval process to become a great asset to San Jose.
- **3)** Feedback Form. To make it easier and quicker for you to respond point-by-point to our suggested improvements, we've prepared this feedback form. We'd like to ask Weingarten Realty Investors to use this form to respond to our comments within 60 days from today. That would be May 10th. *Is that feasible*?

In the meantime, <u>can we set up a follow-up meeting with you in March</u> to go over our scorecard & letter and answer any questions you may have? Our Development Manager Gavin Lohry will be following up to set that up. We'll also be asking Laura Meiners if we can follow up and chat with her.

In the coming days, we'll be adding the above scorecard & letter to <u>our website</u>, and the <u>video of your presentation</u> to our members is already on our Facebook Live page.

Thank you very much for considering our members' views on this project.

Warmly, Alex

Alex Shoor Executive Director Catalyze SV

Engage: <u>www.CatalyzeSV.org</u>

Donate: www.CatalyzeSV.org/donate

From: PlanningSupportStaff
To: Meiners, Laura; Mitre, Betty

Subject: FW: Cambrian Village, Mixed-use Signature Project | Introduction & Request for Meeting

Date: Friday, July 15, 2022 10:16:34 AM

Attachments: image001.pnq

image002.png

## FOR CC PACKET

Thank you,

## **Planning Support Staff**

City of San Jose | PBCE – Planning Division 200 E Santa Clara Street, 3rd Floor Tower | San Jose, CA 95113

E: planningsupportstaff@sanjoseca.gov

From: Planning Commission 5 < PlanningCom5@sanjoseca.gov>

Sent: Wednesday, July 13, 2022 3:14 PM

To: PlanningSupportStaff < PlanningSupportStaff@sanjoseca.gov>

Subject: Fwd: Cambrian Village, Mixed-use Signature Project | Introduction & Request for Meeting

## Begin forwarded message:

From: Sean Morley < > Date: July 12, 2022 at 10:10:04 AM PDT

To: Planningcom1@sanjoseca.gov, Planningcom2@sanjoseca.gov, planningcom3@sanjoseca.gov, Planningcom4@sanjoseca.gov, PlanningCom5@sanjoseca.gov, Planningcom6@sanjoseca.gov, Planningcom7@sanjoseca.gov, PlanningCom8@sanjoseca.gov, planningcom9@sanjoseca.gov, PlanningCom10@sanjoseca.gov, PlanningComCW@sanjoseca.gov

Subject: RE: Cambrian Village, Mixed-use Signature Project | Introduction & Request for Meeting

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Dear Chairperson Oliverio and Planning Commissioners,

We look forward to presenting Cambrian Village to the Commission tomorrow night and want to provide you with a few quick updates in advance of the hearing.

We are very pleased the Planning Department has recommended approval of Cambrian Village in the staff report released last week. It provides an excellent overview of the project and how it supports important City planning goals. It also summarizes the unique efforts we have made with the community over many years to design this mixed-use urban village "Signature Project" for neighbors to enjoy for generations to come.

More than 600 residents have pledged support for Cambrian Village, and more than 90 letters have now been sent to the Planning Commission in support of the project. Many stakeholder groups, including Greenbelt Alliance, Silicon Valley Leadership Group, Bay Area Housing Advocacy Coalition, Catalyze SV, Bay Area Council, San Jose Chamber of Commerce and YIMBY Action are also supporting Cambrian Village.

As you may have heard, the applicant has advised the City we are doubling the number of on-site, deed-restricted affordable units that Cambrian Village will provide. The updated affordable housing plan now includes:

- 30 On-site Inclusionary Units in the mixed use building at 100% AMI
- An In-Lieu Fee in the approximate amount of at least \$7.88M.
- A Commercial Linkage Fee in the approximate amount of at least \$1.13M.
- 27 Accessory Dwelling Units (affordable by design)

Our team would be more than happy to answer any questions you may have before the hearing tomorrow night. Feel free to contact me at if you wish to meet or talk by phone.

Sincerely,

Sean Morley Cambrian Village development team

**From:** Sean Morley

**Sent:** Tuesday, June 28, 2022 3:30 PM

**To:** 'Planningcom1@sanjoseca.gov' < <a href="mailto:Planningcom1@sanjoseca.gov">Planningcom1@sanjoseca.gov</a>;

'Planningcom2@sanjoseca.gov' < <u>Planningcom2@sanjoseca.gov</u>>;

'Planningcom3@sanjoseca.gov' < <u>Planningcom3@sanjoseca.gov</u>>;

'Planningcom4@sanjoseca.gov' < <u>Planningcom4@sanjoseca.gov</u>>;

'Planningcom5@sanjoseca.gov' < <u>Planningcom5@sanjoseca.gov</u>>;

'Planningcom6@sanjoseca.gov' < <u>Planningcom6@sanjoseca.gov</u>>;

'Planningcom7@sanjoseca.gov' < <u>Planningcom7@sanjoseca.gov</u>>;

'Planningcom8@sanjoseca.gov' < <u>Planningcom8@sanjoseca.gov</u>>;

'Planningcom9@sanjoseca.gov' < <u>Planningcom9@sanjoseca.gov</u>>;

'Planningcom10@sanjoseca.gov' < <u>Planningcom10@sanjoseca.gov</u>>;

'PlanningcomCW@sanjoseca.gov' < <u>PlanningcomCW@sanjoseca.gov</u>>

**Subject:** Cambrian Village, Mixed-use Signature Project | Introduction & Request for Meeting

Dear Chairperson Oliverio and Planning Commissioners,

I am writing to introduce you to the Cambrian Village Mixed-use Signature Project, which is scheduled to come to the Planning Commission on July 13th for review and recommendation on the Final EIR, Pre-zoning and Annexation applications.

We look forward to the Planning Department staff report coming out soon and presenting the mixed-use village to the Commission on July 13th. The Cambrian Village development team would also welcome an opportunity to meet with you before the hearing to review this unique Signature Project and address any initial questions you may have.

In the meantime, you can learn more about Cambrian Village by visiting our website at <a href="https://www.cambrianvillage.com">www.cambrianvillage.com</a>, reviewing the attached project summary, and reading below.



Six years in the making, Cambrian Village provides a new community vision for the heart of Cambrian and a place for residents to enjoy for generations to come. The current site is a dated, underutilized shopping center with a sea of parking that poses an incredible opportunity for redevelopment to better serve the community. The mixed-use village design is based on a concept plan created by our neighbors and detailed guidelines provided by Council District 9 in 2019 following dozens of meetings and surveys in the community that started years earlier. Since filing updated applications in 2020, the development team and City have held several more community meetings and repeatedly refined and updated the design in response to ongoing community feedback.



The 17.3 net acre site has been planned for people - not cars - with four acres of public open space and walking paseos linking a central park and large public plaza with small commercial shops, restaurants, and outdoor seating to four other smaller open spaces. With 428 housing units, there are all kinds of housing opportunities including small apartments over the plaza shops (including on-site affordable units), for-sale townhomes and very small lot single-family homes, many with granny units. A senior assisted living building providing a full spectrum of care and a new 229 room hotel both front the central park.



A new pedestrian-friendly "Main Street" brings everything together and provides access to ample underground parking. We are of course preserving the iconic carousel, and also providing raised bike lanes, a community garden area, and space for a farmers market along with many other unique community benefits.

Over 600 nearby residents have already endorsed Cambrian Village, and the project has the support of many organizations, including: Greenbelt Alliance, Silicon Valley Leadership Group, Bay Area Housing Advocacy Coalition, Catalyze SV, Bay Area Council, and San Jose Chamber of Commerce.

Should you wish to meet with the Cambrian Village development team or if you have any questions, please contact Sean Morley at

Regards,

The Cambrian Village development team

From: PlanningSupportStaff
To: Meiners, Laura; Mitre, Betty

Subject: FW: Please Support Cambrian Village Project!

Date: Friday, July 15, 2022 10:17:01 AM

Attachments: Cambrian Village HAC Letter of Support-2.pdf

Cambrian Village Supporters - Sheet1.csv

FOR CC PACKET

Thank you,

## **Planning Support Staff**

City of San Jose | PBCE – Planning Division 200 E Santa Clara Street, 3rd Floor Tower | San Jose, CA 95113

E: planningsupportstaff@sanjoseca.gov

From: Ali Sapirman <

Sent: Wednesday, July 13, 2022 4:55 PM

**Subject:** Please Support Cambrian Village Project!

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[External Email]

Dear San José Planning Commissioners,

I am writing to you on behalf of the Housing Action Coalition who is pleased to share the endorsement of 14200 Union Avenue! I have attached our official letter of support. I have also attached 37 letters of support from our members.

Congratulations to Chair Oliverio and Vice Chair Lardinois in your new roles! Additionally, welcome to the new commissioners Ahluwalia and Barocio -- I am looking forward to hearing from you at tonight's meeting.

In solidarity, Ali Sapirman

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Ali Sapirman | Pronouns: They/Them South Bay Organizer | Housing Action Coalition 95 Brady Street, San Francisco, CA 94103

Cell: | Web: sfhac.org



To opt out of all HAC emails, respond to this email with "unsubscribe all".



July 13, 2022

To Whom it May Concern,

The Housing Action Coalition (HAC) is pleased to endorse Kimco Realty's Cambrian Village project. HAC's Project Review Committee has determined that this project meets our high standards for urban design, sustainability, and community benefits, while also delivering desperately-needed housing that will help alleviate San Jose's affordability crisis.

The Committee commends the project sponsors for their extensive efforts to address community concerns while bringing new housing and community space to one of San Jose's lowest density neighborhoods. This project will replace underutilized retail and 18 acres of surface parking with 428 new homes, welcoming a diversity of family sizes and income levels to the neighborhood. 30 homes are designated for BMR deed restriction, and the project will generate approximately \$9 million in in-lieu Affordable Housing fees, meeting the city's inclusionary requirements. The Committee commends the project sponsors for designing multifamily housing and ADUs around natural affordability, and we strongly encourage efforts to include deeper affordability wherever feasible to encourage socioeconomic diversity.

We also appreciate that Cambrian Village has been designed to prioritize pedestrian and bike access. With homes oriented around a central plaza and abundant public green space, the pedestrian experience is enjoyable and accessible for both residents and community members. Infrastructure improvements will also include 229 bike parking spaces and raised bike lanes along Union Ave and Camden Ave, encouraging use of green transit options. The committee understands that this site is located in a car-centric area, however we strongly encourage the project sponsors to increase bike parking, and reduce residential parking to serve the long-term growth of the neighborhood and future public transportation improvements.

The Review Committee further commends Kimco Realty's extensive efforts to engage neighbors and provide an array of community benefits that include:

- A 229-bed hotel and a 110-bed assisted living facility.
- 50,000 square feet of commercial space including retail and restaurants.
- More than four acres of public open space, including a public plaza, a central park with an amphitheater for public performances, community gardens, and a children's playground.
- The restoration of a nearly 100% impervious surface lot to green open space, and a vastly improved stormwater maintenance system.

Kimco Realty has been especially diligent in working with neighbors and the city to envision a thriving neighborhood center, while delivering much-needed housing options for San Jose's future generations. San Jose and the entire Bay Area are grappling with a region-wide housing shortage and we therefore urge you to support Cambrian Village and these 428 new homes.

Sincerely,

Corey Smith, Executive Director





First name	Last name	Email	Address	City	State/Province	State/Province Abbreviated	ZIP code	Country	Target State
Alex	Storer			San Jose	California	CA	95112 US		CA
Flora	Moreno de Thompson			San Jose	California	CA	95112	2 US	CA
Salvador	Figueroa			San Jose	California	CA	95136	5 US	CA
Kristal	Caidoy			San Jose	California	CA	95110	US	CA
Deborah	St Julien			San Jose	California	CA	95136	5 US	CA
Jonathan	Gordon		_	San Jose	California	CA	95112	2 US	CA
Rosalia	Estrada			San Jose	California	CA	95134	l US	CA
Elizabeth	Barcelos			San Jose	California	CA	95125-1771	US	CA
Faizah	Armenta			San Jose	California	CA	95136	5 US	CA
James	Marshall			San Jose	California	CA	95125	5 US	CA
Jeffrey	Thompson			San Jose	California	CA	95112	2 US	CA
Jimmie	Yonemoto			San Jose	California	CA	95126	S US	CA
Sarah	Carrillo			San Jose	California	CA	95116	S US	CA
Ryan	Globus			San Jose	California	CA	95126	S US	CA
Johnny	Le			San Jose	California	CA	95111	L US	CA
Caryn	Graves			Berkeley	California	CA	94702	2 US	CA
Brian	Wheatley			San Jose	California	CA	95118	3 US	CA
Roman	Perkis			San Jose	California	CA	95136	S US	CA
Laurie	Fraker			El Centro	California	CA	92243	3 US	CA
Ilya	Gurin			Mountain View	California	CA	94043	3 US	CA
Ted	Fishman			San Jose	California	CA	95123	3 US	CA
Jimmie	Yonemoto			San Jose	California	CA	95126	S US	CA
Joyce	Miller			San Jose	California	CA	95123	3 US	CA
Allan	Campbell			San Jose	California	CA	95132	2 US	CA
Kelly	Snider			San Jose	California	CA	95126	S US	CA
Kevin	Shlosberg			San Jose	California	CA	95117	7 US	CA
Sayanan	Sivaraman			San Jose	California	CA	95112	2 US	CA
Flora	Moreno de Thompson			San Jose	California	CA	95112-5253	US	CA
Allan	Campbell			San Jose	California	CA	95132	2 US	CA
Alexa	Kaskowitz			San Jose	California	CA	95112	2 US	CA
JEFFREY	HERDMAN			San Jose	California	CA	95129	) US	CA
Laurie	Fraker			El Centro	California	CA	92243	B US	CA
Mark	Macy			San Francisco	California	CA	94118	3 US	CA
Elizabeth	Conlan			Santa Cruz	California	CA	95139	9 US	CA
Neil	Park-McClintick			Cupertino	California	CA	95014	l US	CA
Caryn	Graves			Berkeley	California	CA	94702	2 US	CA