

Final Environmental Impact Report

University Plaza Phase II Project

SCH Number 2017052045



September 2019



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SECTION 1.0 INTRODUCTION

This document, together with the Draft Environmental Impact Report (Draft EIR), constitutes the Final Environmental Impact Report (Final EIR) for the University Plaza Phase II Project.

1.1 PURPOSE OF THE FINAL EIR

In conformance with the California Environmental Quality Act (CEQA) and CEQA Guidelines, this Final EIR provides objective information regarding the environmental consequences of the proposed project. The Final EIR also examines mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts. The Final EIR is intended to be used by the City of East Palo Alto in making decisions regarding the project. The CEQA Guidelines advise that, while the information in the Final EIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the Draft EIR by making written findings for each of those significant effects.

According to the State Public Resources Code Section 21081, no public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

- (a) The public agency makes one or more of the following findings with respect to each significant effect:
 - (1) Changes or alterations have been required in, or incorporated into, the project which will mitigate or avoid the significant effect on the environment.
 - (2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
 - (3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities of highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.
- (b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

1.2 CONTENTS OF THE FINAL EIR

CEQA Guidelines Section 15132 specify that the Final EIR shall consist of:

- a) The Draft EIR or a revision of the Draft;
- b) Comments and recommendations received on the Draft EIR either verbatim or in summary;
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR;

- d) The Lead Agency's responses to significant environmental points raised in the review and consultation process; and
- e) Any other information added by the Lead Agency.

1.3 PUBLIC REVIEW

In accordance with CEQA and the CEQA Guidelines, the City shall provide a written response to a public agency on comments made by that public agency at least 10 days prior to certifying the EIR. The Final EIR and all documents referenced in the Final EIR are available for public review at the City of East Palo Alto's Community and Economic Development Department, 1960 Tate Street, East Palo Alto on weekdays during normal business hours. The Final EIR is also available for review on the City of East Palo Alto's website: <http://www.ci.east-palo-alto.ca.us/index.aspx?NID=642>.

SECTION 2.0 PARTIES THAT RECEIVED THE DRAFT EIR

CEQA Guidelines Section 15086 requires that a local Lead Agency consult with and request comments on the Draft EIR prepared for a project of this type from Responsible Agencies (government agencies that must approve or permit some aspect of the project), trustee agencies for resources affected by the project, adjacent cities and counties, and transportation planning agencies. The following agencies, organizations, and individuals received a copy of the Draft EIR from the State Clearinghouse or the Notice of Availability from the City of East Palo Alto:

Public Agencies

- California Air Resources Board
- California Emergency Management Agency
- Department of Water Resources
- Digital Public Library of America – Environmental Review Unit
- San Francisco Bay Conservation and Development Commission
- Timothy Sable, District Chief Caltrans, District 4
- Planning Director, City of Palo Alto
- Philip Crimmins, Caltrans Division of Aeronautics
- John Rowden, California Office of Emergency Services
- Hans Kreuzberg, State Office of Historic Preservation
- Terry Roberts, Office of Planning and Research
- Judy Nevis, California Department of Housing & Community Development
- Gregg Erickson, Regional Manager California Department of Fish and Wildlife
- Superintendent, Ravenswood City School District
- Office of Superintendent, Sequoia Union High School District
- Charles Ice, San Mateo County Health Services, Groundwater Protection Program
- Director of Community Development, City of Menlo Park
- County Clerk, County of San Mateo
- Neil Cullen, San Mateo County Public Works
- County of Santa Clara Planning Office
- Ricardo Romagnoli, Pacific Gas and Electric
- West Bay Sanitary District
- Jane Lockwood, SamTrans
- Lee Hawkins, Acting General Manager, East Palo Alto Sanitation District
- Mark Johnson, San Francisco Regional Water Quality Control Board
- Rich Napier, Executive Director C/CAG
- William Springer, Santa Clara County Water District
- Library Manager, East Palo Alto Library

- Becky Frank, District Branch Chief, Caltrans
- City Manager, City of Menlo Park
- David F. Carbone, City/County Association of Governments of San Mateo County
- Jaelyn Winkel, Bay Area Air Quality Management District
- California Department of Toxic Substances Control
- Ms. Lynn L. Jacobs, Director, California Department of Housing and Community Development
- Becky Frank, District Branch Chief, Caltrans
- CA Public Utilities Commission
- US Army Corp Engineers San Francisco District
- US Fish and Wildlife Service Region 8
- US Environmental Protection Agency Region 9
- David Boesch, County Manager, County of San Mateo
- Dr. Jean Holbrook, Superintendent, San Mateo Office of Education
- Mr. Ron Galatolo, Chancellor, San Mateo County Community College District
- Ms. Ann Stillman San Francisquito Creek Flood Zone 2; Ravenswood Slough Flood District
- Mr. Leon Nickolas, President San Mateo County Mosquito and Vector Control District
- Fire Chief Harold Schapelhouman, Menlo Fire Protection District
- Katie Boyd, Northern CA Carpenters
- San Francisquito Creek Joint Powers Authority
- Michael Hettenhausen, County of Santa Clara, Parks and Recreation Department
- Native American Heritage Commission, Environmental and Cultural Department
- California State Clearinghouse

Organizations, Businesses, and Individuals

- William Nack, Executive Officer San Mateo County Building and Trades Council
- Tameeka Bennett, Envision, Transform, Build – East Palo Alto
- Eve Sutton
- Bernardo Huerta
- Marcie Rice, AT&T Laboratories
- Superintendent, American Water Company
- Cristina Salguero Holstine, Senior Land Planner, Pacific Gas & Electric Company
- Stephen E. Abbors, General Manager, Mid-Peninsula Regional Open Space District
- Native American Heritage Commission, Environmental and Cultural Department

SECTION 3.0 RESPONSES TO DRAFT EIR COMMENTS

In accordance with CEQA Guidelines Section 15088, this document includes written responses to comments received by City of East Palo Alto on the Draft EIR for the University Plaza Phase II Project. Comments are organized under headings containing the source of the letter and its date. The specific comments from each of the letters and/or emails are presented with each response to that comment directly following. Copies of the actual letters and emails received by City of East Palo Alto are included in their entirety in Appendix A to this document. Comments received on the Draft EIR are listed below.

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FEDERAL AND STATE AGENCIES

A. California Department of Transportation District 4 (dated December 6, 2018)

Comment A.1: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the DEIR.

Project Understanding. The project would demolish the existing buildings on site and construct an eight-story structure with approximately 233,840 square feet of office space and a five-story, 279,995 square foot parking structure with 772 parking spaces. Vehicular and bicycle access to the garage would be provided via a driveway off Donohoe Street and two right-turn-only driveways off University Avenue. Pedestrian access would be provided to the structures from sidewalks along University Ave and Donohoe St. The proposed project would also include two transportation system modifications: alterations to the Euclid Avenue/East Bayshore Road/Donohoe St. intersection, and the realignment of the northbound US 101 on-ramp at Donohoe St.

Response A.1: The comment is a statement of facts about Caltrans and the project. It does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

Comment A.2: **Design.** Project Overview indicates that bicycle access to the parking garage will be via Donohoe St. Figure 2.5-5 does not indicate any bicycle lanes or facilities. Please specify if cyclists are intended to share the 12 ft. east bound lane with motor vehicles and how will cyclists exit the garage? Will they be expected to make left turns in to the 11 ft. westbound thru-lane on Donohoe?

Response A.2: Long-term bicycle parking (40 spaces) will be located on the ground floor of the parking garage. Short-term bicycle parking (40 spaces) will be located along the project frontage on University Avenue and will be scattered throughout the site in landscaped areas. There is a Class II bike lane on University Avenue. From University Avenue, bicyclists could access bike parking on the project frontage or could use the proposed pedestrian path along the northern boundary of the project site (adjacent to the property line with Bell Street Park) to access the short- or long-term parking spaces. Due to right-of-way constraints, a bicycle path is not proposed on Donohoe Street. Rather, bicyclists will also share the space with the car travel lane on the street and in the parking garage to access long-term parking spaces in the garage.

Comment A.3: Project Overview also indicates that 30 trees would be removed, and four trees in State right-of-way would be removed for the ramp re-alignment. The tree inventory does not appear to cover the State right-of-way. Are the four trees in State right-of-way included in the 30 trees mentioned as being removed? Are any of them Protected Trees?

The four trees that would be removed in the Caltrans right-of-way are in addition to the 30 that would be removed for the office building and parking garage (a total of 34 trees would be removed). These trees include one Canary Island palm (with an approximately 42-inch circumference) and three, multi-trunked Peruvian pepper trees (with varying circumferences between eight inches and 24 inches). The City of East Palo Alto defines a Protected Tree on private property as one with a main stem or trunk that measures 40 inches or greater in circumference at a height of two feet above natural grade, as well as street trees within a public right-of-way. Because the trees are not on private property and are not street trees, they would not be considered Protected Trees. The trees are located within state right-of-way, outside of City jurisdiction and, therefore, are not subject to City ordinance requirements and a permit would not be required for removal.

Replacement planting for trees within the Caltrans right-of-way would be included, to the extent feasible, to offset the necessary removal of trees. Replacement planting would comply with Caltrans' current setback and sight distance requirements. For these reasons, the CEQA impact is less than significant, as described within the Draft EIR.

Comment A.4: Project designers should review Caltrans Highway Design Manual Sections 400 and 500 to verify that an acceptable ramp geometry is feasible. This includes establishing appropriate lane widths, turning geometries and lane drop tapers. It's not clear if the project proposes a signal phase at this location to allow direct access from the project garage driveway directly on to the US 101 on-ramp. The Traffic Study seems to forecast westbound (sic, eastbound) Donohoe movements into the garage, but Figure 2.5-5 does not include that left turn movement.

Response A.4: The project will comply with the design requirements of Caltrans Highway Design Manual Sections 400 and 500 and will obtain the necessary permits for construction of the ramp improvements. A signal will be installed at the garage entrance intersection with Donohoe Street and the US101 access ramp. The signal will provide for left-turn movements from eastbound Donohoe movements into the garage. The ultimate design of the intersection will be coordinated with the City of East Palo Alto and Caltrans.

Comment A.5: Multimodal Impact Fees. The Lead Agency should identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified and incorporated in the Conditions of Approval. We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. Caltrans advises the Lead Agency to contribute fair share fees to the Class I bikeway and pedestrian bridge over US 101. Constructing this project over US 101 at University Ave - see Caltrans District 4 Bike Plan's Appendix A – would improve connectivity in the proposed project area and encourage active transportation. Please see Caltrans District 4 Bike Plan link. <http://www.dot.ca.gov/d4/bikeplan/docs/D4BikePlanProjectList.pdf>.

Response A.5: The proposed project will provide a new sidewalk along the length of its frontage on Donohoe Street. The project is not anticipated to cause a significant impact on pedestrian, bicycle or transit facilities, and thus, is not required to construct any other improvements to these facilities. The City has adopted a transportation impact fee nexus study in order to collect fees for the implementation of transportation improvements (including the US 101 Pedestrian-Bicycle Overcrossing and other active transportation and transit improvements). This fee would apply to the proposed project.

Comment A.6: Vehicle Trip Reduction: Given the project's intensification of use and the massive amount of vehicle parking spaces, the project should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures will be critical to facilitate efficient transportation access to and from the project site and reduce transportation impacts associated with the project. The measures listed below will promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and convenient transit access;
- Secured bicycle storage facilities located conveniently near entrances to minimize deterrent of bicycle use due to weather conditions;
- Bicycle parking;
- Subsidized transit passes on an ongoing basis;
- Shuttle service for employees to the Fruitvale or Coliseum BART Station;
- Fix-it bicycle repair station(s);
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces conveniently located to encourage carpooling and clean-fuel vehicles;
- Lower parking ratios;
- Transportation and commute information kiosk;
- Showers, changing rooms and clothing lockers for bike commuters;
- Bicycle route mapping resources and bicycle parking incentives;
- Employee transportation coordinator;
- Emergency Ride Home program;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with annual Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on nearby State facilities. These smart growth approaches are consistent with the MTC's Regional Transportation Plan/SCS goals and the County does not have an adopted VMT threshold; therefore, reduction of VMT is not required under CEQA.

Response A.6: As described within the Draft EIR, the City of East Palo Alto has a TDM ordinance that requires the preparation and implementation of a TDM (also known as a transportation system management [TSM]) plan in the City of East Palo Alto), which would result in a 25 percent reduction in vehicular trips to and from the project site. The TSM plan would encourage multimodal travel, carpooling, and alternate work schedules to avoid peak hours. Consistent with the ordinance requirements, employers must complete and submit to the city TSM administrator a confidential employee survey when the program is initiated and periodically thereafter. Employee surveys include information on number of employees, residence of employees, mode of travel to work, usual work schedule, and interest of employees in commute alternatives.

Each employer of 100 or more employees will prepare and submit an employer TSM program, including a commute alternative plan, which demonstrates how at least 25 percent of the employees at the workplace will commute to work on a regular basis by a mode other than single-occupancy vehicle or will use an alternative work hour schedule.

The City is updating its TSM ordinance to foster greater clarity and accountability for the 25-percent trip reduction. The project would be subject to the requirements of the current ordinance, and later the requirements of the City's new TSM ordinance once it is adopted.

Comment A.7: Lead Agency. As the Lead Agency, the City of East Palo Alto is responsible for all project mitigation, including any needed improvements to the STN. The project's financing, scheduling, implementation responsibilities and monitoring should be fully discussed for all proposed mitigation measures, prior to the submittal of an encroachment permit. Potential mitigation measures that include the requirements of other agencies- such as Caltrans- are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.

Response A.7: This comment is acknowledged by the City. A Mitigation Monitoring and Reporting Program has been prepared for the project, which outlines mitigation measure timing and responsibilities. The City, as the lead agency, will oversee implementation of the project mitigation measures and conditions of approval.

Comment A.8: Encroachment Permit. Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed and stamped traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit. <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Response A.8: The project applicant will obtain encroachment permits as necessary for the project. The comment does not raise any issues about the adequacy of the EIR; therefore, no further response is required.

REGIONAL AND LOCAL AGENCIES

B. Bay Area Air Quality Management District (dated February 7, 2019)

Comment B.1: Bay Area Air Quality Management District (Air District) staff reviewed the Draft EIR (DEIR) for the University Plaza Phase II Project (Project), near the Highway 101/University Avenue interchange. The Project will merge four parcels to one, two existing buildings will be demolished, and an eight-story office building and a five-story parking structure with 773 parking spaces will be constructed. In addition, the project includes the finding or construction of improvements at the intersection of Donohoe Street and the US 101 Northbound offramp, with four through lanes.

Air District staff has the following recommendations regarding the DEIR's air quality and greenhouse gases impact analysis.

1. The air quality analysis does not appear to have included air pollution emission estimated for roadway improvements at the US 101 Northbound Off-ramp, Donohoe Street, and University Avenue. The transportation infrastructure modifications are included in the DEIR's project description, but no references or analysis are included in the DEIR or the Air Quality Technical Assessment. The City should disclose the project schedule for the roadway improvements so the potential air quality impacts from the entire project can be estimated to determine whether potentially significant localized impacts will occur if demolition, construction of the office building and parking structure and roadway improvements occur simultaneously.

Response B.1: An updated air quality and health risk assessment was prepared for the project to account for the roadway improvements at US 101 and Donohoe Street (see Appendix B: Construction Air Quality & Health Risk Assessment). Due to project delays, the construction schedule was changed to begin in March 2020 and will last for 274 construction workdays to build the roadway improvements and the proposed project structures. The results of the assessment show that the project emissions (including those associated with the roadway construction) would not exceed BAAQMD thresholds for localized construction-related health risks at a project level or cumulative level. A summary of the assessment has been added to Section 4.0 Draft EIR Text Revisions. As a result, the project would have a less than significant impact as stated in the Draft EIR.

Comment B.2: 2. Based on staff's analysis of the Project site and vicinity, this project area has elevated levels of toxic air contaminants (TACs) and fine particulate matter (PM_{2.5}) from existing nearby stationary and mobile sources. The Project's contribution to these existing air pollution levels was not identified through a health risk assessment (HRA) or dispersion modeling for the Project's operation; only construction activity was analyzed with an HRA. Staff recommends that an analysis of operational and cumulative PM_{2.5} and TAC impacts be prepared for the Project to identify the potential health risks associated with this project on nearby sensitive receptors, including the two roadway improvement scenarios.

Response B.2: The updated air quality and health risk assessment in Appendix B also includes an operational analysis of stationary and mobile sources for the project,

including the proposed project emergency generator. A project-level and cumulative discussion of the revised assessment has been added to Section 4.0 Draft EIR Text Revisions. As stated in the text revisions, the project's operational emissions would be below specified BAAQMD thresholds and the impacts would be less than significant (as stated in the Draft EIR).

Comment B.3: 3. The Initial Study (Appendix A) and the Focused DEIR do not adequately analyze the potential impacts of greenhouse gases for construction and operation, including the increased roadway capacity to and from US 101. The Project should demonstrate consistency with all the measures identified in the 2017 Scoping Plan needed to meet the State's strategy to achieve Statewide 2030 GHG reduction goals and being on track to meet 2050 climate stabilization goals.

Air District staff recommends the following additional feasible mitigation measures be required of the project to be more consistent with the 2017 Scoping Plan:

- Newly constructed non-residential buildings shall be designed to achieve a 10 percent or greater reduction in energy use versus a standard Title 24 code-compliant building through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Alternatively, this measure can be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.
- Newly constructed buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Codes (CALGreen), Section A4.106.5 and A5.106.11.2.
- New outdoor parking lots for multi-family and non-residential buildings shall include trees and/or solar canopies designed to result in 50 percent shading of parking lot surface areas. If tree canopy is used, then it shall be sufficient to achieve this 50 percent shading requirement within 15 years of acquisition of the building permit. If a solar canopy system is used, then it must be installed and achieve 50 percent shading prior to issuance of an occupancy permit. Applicable Project types: multi-family residential and non-residential building with outdoor, on-site parking lots.
- Require the electrification of all loading docks to facilitate plug-in capability and require trucks to utilize grid power to deliver goods.
- Require the project to meet SB 743 derived vehicle miles traveled (VMT) reduction of 15% below the regional average VMT.
- Require 10% of parking spaces to include electric vehicle charging equipment and designated for electric vehicle parking only.
- Require the use of zero emission off road equipment for construction and operation, as well as renewable fuels (such as renewable diesel and biogas), if available.
- All construction activities shall implement waste reduction and recycling strategies in accordance with sections 4.408 and 5.408 of the 2016 California Green Building Standards (CALGreen). In addition, projects shall achieve or exceed the enhanced Tier 2 targets for reusing or recycling construction waste of 75 percent for residential and 80 percent for nonresidential buildings as described in Sections A4.408 and A5.408 of the CALGreen standards.

Response B.3: The project is moving the existing US 101 northbound onramp to more closely align with the project driveway and will be installing a signal at the driveway intersection at Donohoe Street and the US 101 onramp. The onramp is currently two-lanes wide and would continue to be a two-lane onramp. The project would not add additional lanes, queuing space, or excess capacity such that significant new greenhouse gas (GHG) emissions would occur.

Response to comments involving the 2017 Scoping Plan, follow. As described below, the project would be consistent with the majority of the plan recommendations included by the commenter. The project's GHG emissions impact remains less than significant.

- *Newly constructed non-residential buildings shall be designed to achieve a 10 percent or greater reduction in energy use versus a standard Title 24 code-compliant building through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Alternatively, this measure can be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.*
- *Newly constructed buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Codes (CALGreen), Section A4.106.5 and A5.106.11.2.*

The project would be consistent with CALGreen and the City's GHG reduction strategy. A cool roof will be implemented consistent with code requirements. On-site renewable energy production is not proposed.

- *New outdoor parking lots for multi-family and non-residential buildings shall include trees and/or solar canopies designed to result in 50 percent shading of parking lot surface areas. If tree canopy is used, then it shall be sufficient to achieve this 50 percent shading requirement within 15 years of acquisition of the building permit. If a solar canopy system is used, then it must be installed and achieve 50 percent shading prior to issuance of an occupancy permit. Applicable Project types: multi-family residential and non-residential building with outdoor, on-site parking lots.*

The project does not propose a surface parking lot.

- *Require the electrification of all loading docks to facilitate plug-in capability and require trucks to utilize grid power to deliver goods.*
- *Require 10% of parking spaces to include electric vehicle charging equipment and designated for electric vehicle parking only.*

The project will include electric vehicle charging stations per CALGreen requirements (five percent of parking spaces).

- *Require the project to meet SB 743 derived vehicle miles traveled (VMT) reduction of 15% below the regional average VMT.*

The project includes a mandatory 25 percent TDM requirement, which will reduce the project VMT.

- *Require the use of zero emission off road equipment for construction and operation, as well as renewable fuels (such as renewable diesel and biogas), if available.*

The project has not specifically proposed the use of zero-emission off-road equipment during construction and operation.

- *All construction activities shall implement waste reduction and recycling strategies in accordance with sections 4.408 and 5.408 of CALGreen. In addition, projects shall achieve or exceed the enhanced Tier 2 targets for reusing or recycling construction waste of 75 percent for residential and 80 percent for nonresidential buildings as described in Sections A4.408 and A5.408 of the CALGreen standards.*

The City of East Palo Alto has adopted CalGreen and the project will comply with applicable code provisions for waste reduction and recycling.

C. City of Menlo Park (dated February 7, 2019)

Comment C.1: Thank for you for the opportunity to provide comments on the City of East Palo Alto's draft Environmental Impact Report (EIR) for the University Plaza Phase II project (Project). The proposed Project would redevelop 2.58 acres at 2111 University Avenue, on the northwest corner of University Avenue and Donohoe Street. The Project proposes an eight-story structure with approximately 233,840 square feet of office space and a five-story parking structure with approximately 772 parking spaces. Reconfiguration of the US 101 northbound on-ramp at Euclid Avenue/East Bayshore Road/Donohoe Street is also proposed as part of the Project.

The City of Menlo Park's comments on the draft EIR, many of which were identified in the comment letter on the Notice of Preparation dated June 19, 2017, are described in detail below:

The proposed Project will generate a significant amount of vehicular, transit, bicycle and pedestrian traffic. The traffic study assumed a 25% trip reduction based on a city-required transportation demand management (TDM) plan. The study included some generic details about the TDM plan, but did not include a description of implementation and/or monitoring processes. To take advantage of the 25% trip reduction in the draft EIR, the analysis should identify the supporting local ordinance or adopted documentation setting forth the City of East Palo Alto's TDM requirements, a brief description of what will be included in the plan, a tentative schedule for future tenants to develop, implement and monitor the plan after occupancy, and how the TDM plan will be enforced; otherwise no TDM trip reduction credit should be taken and there should be a more conservative analysis.

Response C.1: As stated within the Draft EIR, the City of East Palo Alto has a TDM ordinance that requires a mandatory 25 percent trip reduction with annual reporting. Specific TSM techniques the project could implement, as identified in the countywide TSM plan, include the following:

- Ridesharing, including carpooling, vanpooling (with disabled access) and buspooling (or club bus);

- Alternative work hours, including flexible work hours, staggered work hours and compressed work week schedules;
- Parking management, including preferential parking for ridesharing vehicles and provision of transit passes or cash subsidies to employees in place of free parking; Use of transit, including ticket subsidies and provision of shuttle service to rail and bus stops;
- Telecommuting, or allowing employees to work at home a portion of the work week and communicate business transactions through electronic media; and
- Bicycling, including provision at the workplace of bicycle storage and parking facilities, as well as employee lockers and showers.

The trip reduction taken in the Traffic Impact Analysis and Draft EIR reflects the City ordinance requirements. The City of East Palo Alto will be updating its TDM ordinance in late spring/early summer of 2019. The updated ordinance will lay out the implementation, monitoring, and enforcement process. The proposed project will be subject to those updated requirements.

Comment C.2: 2. The traffic analysis should be prepared consistent with the City of Menlo Park’s Transportation Impact Analysis Guidelines for analyses of Menlo Park facilities (see <http://menlopark.org/DocumentCenter/Home/View/302>). The analysis used an outdated methodology and should use the 2010 Highway Capacity Manual (HCM) methodology.

Response C.2: The level of service (LOS) calculation for the three study intersections in the City of Menlo Park have been updated using the 2010 HCM methodology. As noted in the ConnectMenlo Draft EIR, however, the counted traffic volumes at the Menlo Park study intersections do not appropriately reflect demand, and isolated intersection operations limit the ability of the Vistro program to capture these results. Therefore, instead of calculated LOS, the existing LOS results are reported based on LOS as identified by the City to reflect “unserved demand.” The LOS results are shown in the following tables.

Table 1: LOS Summary under Existing and Existing Plus Project Conditions

#	Intersection	Peak Hour	Existing		Existing Plus Project		Incr. In Avg Delay
			Avg Delay (sec/veh)	LOS	Avg Delay (sec/veh)	LOS	
1	Willow Road and Bayfront Expressway [Menlo Park] (CMP)	AM	>80*	F	>80*	F	-0.8
		PM	>80*	F	>80*	F	0.9
2	Willow Road and Newbridge Street [Menlo Park]	AM	>80*	F	>80*	F	0.0
		PM	28.5	C	28.8	C	0.3
3	University Avenue and Bayfront Expressway [Menlo Park] (CMP)	AM	>80*	F	>80*	F	0.7
		PM	123.8	F	127.6	F	3.8

Notes:
 * Indicates LOS based on "unserved demand." At these locations, upstream & downstream congestion results in delay not captured by the VISTRO analysis. For intersections #1 and #3, the increase in delay column shows the increase of average delay at the intersection. For intersection #2, the increase in delay column shows the increase of delay on the critical movement of local approaches at the intersection.
Bold indicates a substandard level of service.

Table 2: LOS Summary under Cumulative No Project and Plus Project Conditions

#	Intersection	Peak Hour	Cumulative No Project		Cumulative Plus Project		
			Avg Delay (sec/veh)	LOS	Avg Delay (sec/veh)	LOS	Incr. In Avg or Crit. Delay
1	Willow Road and Bayfront Expressway [Menlo Park] (CMP)	AM	105.0	F	104.5	F	-0.5
		PM	162.5	F	162.5	F	0.0
2	Willow Road and Newbridge Street [Menlo Park]	AM	98.5	F	99.8	F	0.0
		PM	62.6	E	62.9	E	0.0
3	University Avenue and Bayfront Expressway [Menlo Park] (CMP)	AM	96.2	F	99.9	F	3.7
		PM	272.3	F	276.2	F	3.9

Notes:
 * Indicates LOS based on "unserved demand." At these locations, upstream & downstream congestion results in delay not captured by the VISTRO analysis. For intersections #1 and #3, the increase in delay column shows the increase of average delay at the intersection.
 For intersection #2, the increase in delay column shows the increase of delay on the critical movement of local approaches at the intersection.
Bold indicates a substandard level of service.

All three study intersections in Menlo Park currently operate at an unacceptable LOS F during one or both peak hours. Likewise, all three intersections would continue to operate at an unacceptable LOS under cumulative conditions without and with the proposed project. The incremental increase in delay caused by the trips added by the proposed project falls below the City of Menlo Park’s significance thresholds; therefore, the project is considered to have a less than significant impact on the study intersections in Menlo Park.

Comment C.3: In addition, the Settlement Agreement and Release of Claims (Settlement Agreement) between the City of Menlo Park and the City of East Palo Alto requires the cities to “work together to ensure that a Development Project’s potentially significant traffic impacts on the other jurisdiction are analyzed and mitigated.” Thus, the City of Menlo Park’s transportation comments, detailed below, regarding the proposed Project should be addressed in the draft EIR to comply with the Settlement Agreement:

Congestion on local roadways should be analyzed, specifically including the following three intersections:

1. University Avenue/Adams Drive
2. Willow Road/US 101 NB on-off ramp (under construction)
3. Willow Road/US 101 SB on-off ramp (under construction)

The intersection of University Avenue/Adams Drive serves as one of the main accesses to University Avenue for existing and future commercial buildings in the area and has been recommended to be signalized in the City of Menlo Park’s ongoing planning effort for the Transportation Master Plan.

Response C.3: As shown in the Traffic Impact Analysis and Draft EIR, the project would generate only through traffic at the University Avenue/Adams Drive intersection. The additional trips on University Avenue would have a less than significant effect on the unsignalized Adams Drive approach. Because there is no significant impact at this stop-controlled intersection, there is no mitigation required under CEQA. Thus, the project would be in compliance with the Settlement Agreement with regard to impacts at this intersection.

Comment C.4: With the Draft EIR confirming that University Avenue/US 101 ramp intersections are expected to operate at unacceptable level of services (e.g., LOS E/F), it is reasonable to expect a small percentage of Project trips to divert to the Willow Road/US 101 interchange to access US 101, and that should be reflected accordingly.

Response C.4: The City disagrees with this assumption related to diverted trips because it is overly speculative in nature in terms of the CEQA analysis. The project would contribute to improvements and/or implement improvements related to lane widening on Donohoe Street, a new signal and improved signal timing, and a realigned US 101 northbound freeway entrance. These proposed changes would decrease delays at the University Avenue/US 101 ramp intersections under Existing Plus Project conditions and improve overall intersection operations in the vicinity. As a result, traffic diversion to Willow Road/US 101 interchange to access US 101 would be even less likely than under current conditions.

Comment C.5: 3. The draft EIR provided a qualitative transit impact evaluation, but should include transit boarding and alighting analyses to properly evaluate the potential transit impact.

Response C.5: In December 2018, the Governor’s Office of Planning and Research released their Technical Advisory on Evaluating Transportation Impacts in CEQA. The advisory states that projects which block access to a transit stop or block a transit route itself may interfere with transit functions and could have an impact under CEQA. The advisory further states that lead agencies should consult with transit agencies for projects that are located within one half mile of transit stops. As stated in the Draft EIR, the project applicant will consult with SamTrans to relocate the stop on University Avenue during construction, as well as on a more permanent basis once the project is complete.

The advisory also states that, “When evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new transit users as an adverse impact. An infill development may add riders to transit systems and the additional boarding and alighting may slow transit vehicles, but it also adds destinations, improving proximity and accessibility. Such development also improves regional vehicle flow by adding less vehicle travel onto the regional network.” Because the project is infill and will add transit riders, there would be no adverse impact under CEQA (consistent with the conclusions in the Draft EIR).

The closest transit stop to the project site is a SamTrans bus stop located on University Avenue adjacent to the site (see Figure 1: Existing Bus Stop Location). The project proposes to move the bus stop 120 feet north from its current location on University Avenue, past the project site’s property line (see Figure 2: Proposed Bus Stop Location). Relocation of the bus stop would ensure that project construction does not interfere with passenger boarding. The City will work with SamTrans to determine the final design and location of the bus stop. For these reasons, the impact remains less than significant, as described in with Draft EIR.

Figure 1: Existing Bus Stop Location

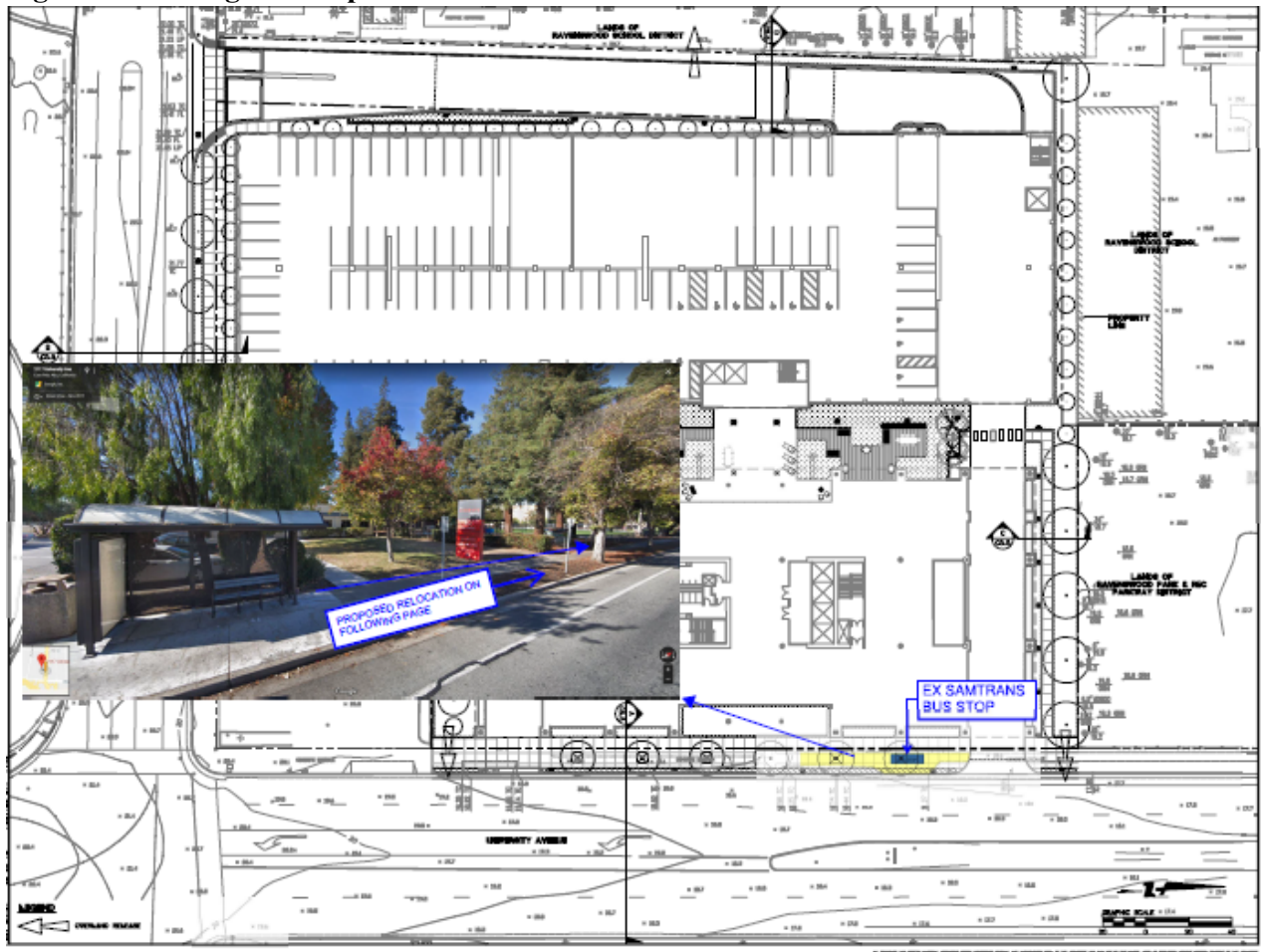
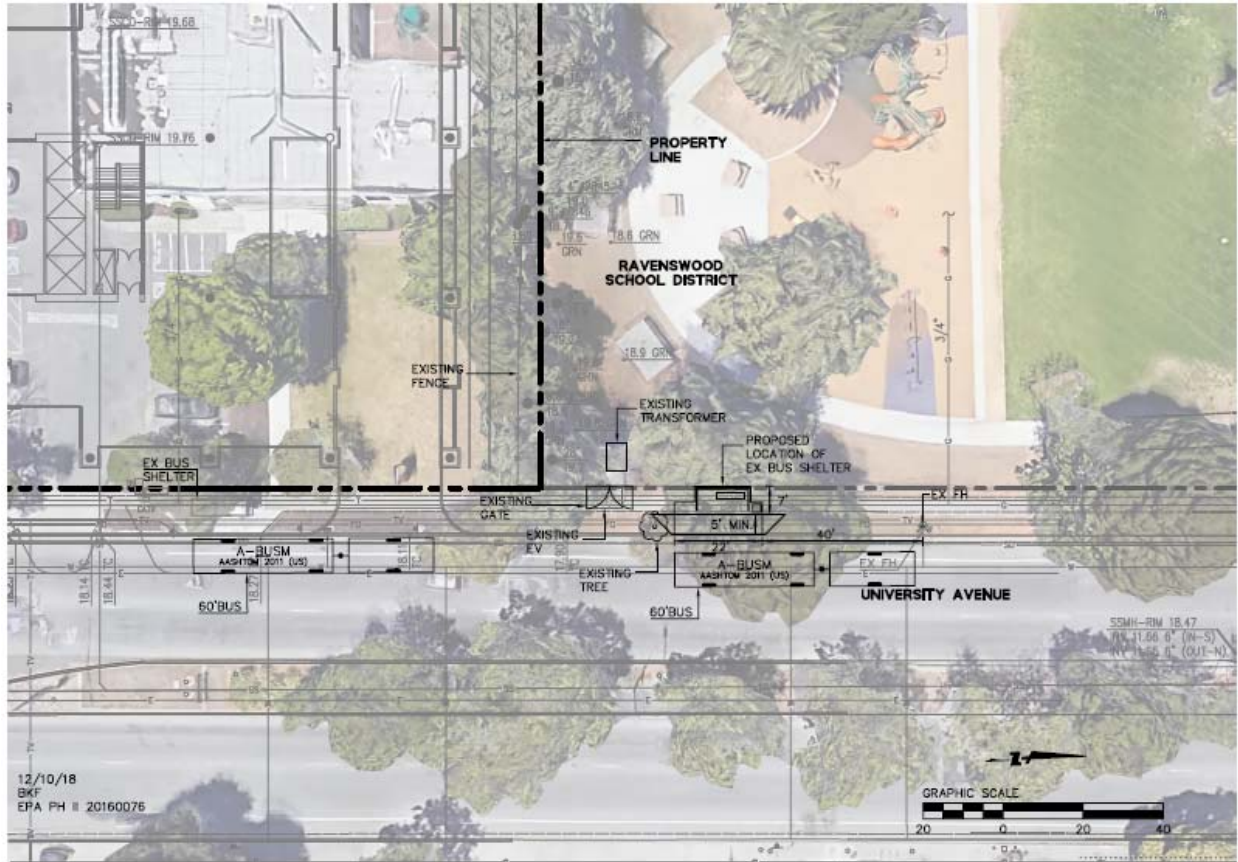


Figure 2: Proposed Bus Stop Location



Comment C.6: 4. Study intersection numbers 1, 2, and 3 are Caltrans intersections but adhere to City of Menlo Park Transportation Impact Guidelines. The following comments apply to these intersections:

- The traffic analysis did not reflect the existing congestion. As summarized in the City of Menlo Park’s General Plan (ConnectMenlo) EIR adopted in 2016, isolated intersection analysis does not account for the queue spillback between intersections on the approaches to the Dumbarton Bridge, including those on Bayfront Expressway, Willow Road, and University Avenue. Furthermore, based on the field observations stated on pages 21 and 22 of the traffic impact analysis, the LOS results derived from the transportation Vistro software are likely underestimating the existing congestion levels. These LOS calculations should be updated in order to present accurate existing and cumulative scenarios to assess project impacts.
- Existing and cumulative Project impacts, for intersections operating at an unacceptable LOS (e.g., LOS E/F) under the no project scenarios, should be evaluated by comparing the intersection average critical delays instead of average delays. Tables ES-1 and ES-2 of the traffic impact analysis report stated “Incr. In Crit. Delay” in the header but appeared to be comparing average delays.

Response C.6: The intersection LOS analysis has been updated to reflect “unserved demand” to more accurately reflect observed traffic conditions (see Response C.2).

The significance thresholds used in this study are the same as those used in the ConnectMenlo DEIR, as described below:

For the two state (Caltrans) controlled study intersections, University Avenue (SR 109)/Bayfront Expressway (SR 84) and Willow Road (SR 114)/Bayfront Expressway (SR 84), the project is said to create a significant adverse impact if for any peak hour:

- a) The level of service degrades from an acceptable LOS D or better under existing conditions to an unacceptable LOS E or F under existing plus project conditions, and the **average delay per vehicle increases by four seconds or more**, or
- b) The level of service is an unacceptable LOS E or F under existing conditions and the addition of project trips causes an **increase in the average delay at the intersection by four seconds or more**.

For the study intersection involving a state route and a city-controlled street: Willow Road and Newbridge Street, the project is said to create a significant adverse impact if for any peak hour:

- a) The level of service degrades from an acceptable LOS D or better under existing conditions to an unacceptable LOS E or F under existing plus project conditions, or the **average delay per vehicle increases by more than 23 seconds per vehicle**, or
- b) The level of service is an unacceptable LOS E or F under existing conditions and the addition of project trips causes an **increase of more than 0.8 seconds in delay to vehicles on the critical movement for any local approach**.

Consistent with the above-listed significant criteria, the increase in delay (listed previously in Table 1 and Table 2) shows the increase of average delay at the two state-controlled study intersections. For the intersection involving a state route and a City-controlled street, the increase in delay on the worst critical movement on the local approaches is reported. For these reasons, the impact at the intersection would still be less than significant, consistent with the conclusions within the Draft EIR.

Comment C.7: 5. The Cumulative Project List in the draft EIR (Table 3.0-2) should include City of Menlo Park pending projects such as the Facebook Willows Village. While the application for the Willow Village was submitted on July 6, 2017 after the Notice of Preparation was released on May 18, 2017, the short amount of time intervening between those two dates and the long amount of time (approximately 18 months) before the draft EIR was released and the high profile nature of the Willow Village suggest that it is reasonable to and should be included in the Cumulative Project List. Please refer the attached for a complete list of applicable projects.

Response C.7: The City of Menlo Park provided a list of development projects based on applications received before or near December 2018, as shown in Table 3, below. The table presents a list of relevant development projects in the City of Menlo Park expected to add a substantial number of trips to the study intersections. The

table also lists the project status and identifies which projects were included in the University Plaza Phase II cumulative scenario. The list contains several project applications received after the University Plaza Phase II Notice of Preparation (NOP) was released on May 18, 2017.

Table 3: Selected Menlo Park Development Projects*			
Project Name and/or Address	Status	Included in Cumulative Scenario?	Notes
Menlo Gateway (100 to 155 Constitution)	Approved	Yes	
Facebook Expansion (301 to 309 Constitution)	Approved	Yes	
New Magnet High School (150 Jefferson Drive)	Approved	Yes	
1430 O'Brien	Approved	Yes*	University Plaza Cumulative reflects 85,000 sf R&D, (earlier project description) current project description includes 66,000 sf R&D, 10,000 sf fitness, 8,000 sf café
1350 Adams Court (1315 O'Brien Drive)	Pending	Yes*	University Plaza Cumulative reflects 113,000 sf R&D, 61,000 sf warehouse, 46,000 sf manufacturing. (earlier project description), current project description includes 260,000 sf R&D
1350 Willow Road (Facebook Willow Village)	Pending	No	Application submitted after University Plaza Phase II NOP (5/18/17), application later withdrawn and recently resubmitted with revised uses
111 Independence Drive	Pending	No	Application submitted on 3/23/18 after University Plaza Phase II NOP (5/18/17)
1105 O'Brien Drive	Pending	No	Application submitted on 3/13/18 after University Plaza Phase II NOP (5/18/17)
151 Commonwealth (162 to 164 Jefferson Drive)	Pending	Yes	University Plaza Cumulative includes trips generated by Buildings 1&2, application for Building 3 submitted on 10/24/17 after University Plaza Phase II NOP (5/18/17)
1345 Willow Road	Pending	No	Application submitted on 12/14/18 after University Plaza Phase II NOP (5/18/17), City Council approved funding commitment on 7/18/17

Table 3: Selected Menlo Park Development Projects*			
Project Name and/or Address	Status	Included in Cumulative Scenario?	Notes
141 Jefferson Drive	Pending	No	Application submitted on 10/29/18 after University Plaza Phase II NOP (5/18/17)
Notes: Based on Applications Submitted Near or Before December 2018			

Given the large study area and complexity of the analysis completed for the University Plaza Phase II Project, it is not possible or required under CEQA to update the cumulative analysis on an ongoing basis to reflect projects that file applications after the NOP was published. While the original Facebook Willows Village application was filed only a short time after the NOP was published, the Facebook project was dormant for many months with an uncertain future. The original application was later withdrawn, and a new application was only recently resubmitted with a revised project description. Thus, it would have been entirely speculative to include this project in the cumulative scenario based on the initial project application since the description of the Facebook project was still undergoing revisions while the University Plaza DEIR was being prepared. For these reasons, it was not reasonable to include the projects noted in Table 3 in the cumulative analysis and the conclusions in the Draft EIR are adequate.

Comment C.8: 6. The Draft EIR indicates that one of the project objectives is attracting high-tech companies and employees. If the Project intends to house tech companies with higher employee densities, the employment projections and associated analysis (housing, VMT, traffic, etc.) should be revised and updated to account for this land use type.

Response C.8: The Hexagon Traffic Impact Analysis (TIA) uses 928 employees for the vehicle miles traveled (VMT) analysis. The VMT analysis in the TIA is for informational purposes only, since the City of East Palo Alto has yet to adopt a VMT policy or impact thresholds per Senate Bill 743. This is a conservative estimate for the number of employees for this type of office space development with regard to VMT. A higher number of employees (approximately 1,400) was utilized for the remainder of the analysis in the environmental document (this number is noted as an error as described in further detail in Response E.4 and corrected in Section 4.0 Draft EIR Text Revisions). The analysis within the Draft EIR was adequate to account for potential environmental impacts as a result of employees.

Comment C.9: 7. High-tech companies like Facebook or organizations like Stanford are achieving very high success rates at reducing drive-alone rates. Therefore, the 55 TSM Alternative should not be dismissed as infeasible. If it is adopted as the environmentally superior alternative, monitoring and enforcement provisions should be included to ensure the Project meets the transportation demand management performance goals.

Response C.9: Organizations such as Facebook (54 percent drive alone rate in 2016, and currently subject to a trip-cap) and Stanford University (43 percent drive-alone rate in 2017) are very large employers with coordinated resources to provide integrated driving alternatives to their thousands of employees.^{1,2} While the proposed project tenant has not yet been identified, there will not be as large of an employee base as with Facebook and Stanford University. Given the lack of transit services in the vicinity (including the distance to Caltrain), the 55 percent TSM Alternative could not be deemed to be a realistic alternative for the project. Thus, it was found to be infeasible in the Draft EIR.

Comment C.10: 8. The proposed Project will generate office workers and support staff and could exacerbate demand for housing and impact housing affordability and availability in East Palo Alto, as well as the region. The draft EIR fails to analyze the population growth and housing impacts of this increased employment. Despite the City of Menlo Park’s request (and that of Invision Transform Build EPA), the draft EIR does not include the preparation of a housing needs assessment (HNA) to identify the housing demand associated with the proposed Project. The Settlement Agreement (see Sections 2.2 and 2.6) requires the preparation of an HNA; therefore, to comply with the Settlement Agreement, an HNA must be prepared for the proposed Project. The scope of the HNA is, to the extent possible, to include an analysis of the multiplier effect for indirect and induced employment by the proposed Project and its relationship to the regional housing market and displacement.

Response C.10: Housing affordability and availability are not directly CEQA issues. A Housing Needs and Displacement Assessment and Fiscal Impact and Educational Analysis Report were, however, prepared for the project by BAE Urban Economics. These two reports will be included within and discussed as part of the City’s staff report for the project and by the City Council in their consideration of the project.

Comment C.11: A lead agency is required to recirculate an EIR when significant new information is added. See 14 Cal Code Regs (CEQA Guidelines) Section 15088.5. The City of Menlo Park looks forward to reviewing a recirculated draft EIR that addresses the comments identified above and the opportunity to meaningfully comment on that new information.

Response C.11: No new significant impacts have been identified nor has substantial new information related to the impact conclusions been provided in the comment letter. As a result, recirculation of the Draft EIR under CEQA Guidelines Section 15088.5 is not required.

¹ City of Menlo Park. Staff Report. Use Permit/Facebook Inc./923-925 Hamilton Avenue. June 6, 2016. <https://www.menlopark.org/DocumentCenter/View/10366/F6---925-Hamilton-Avenue---16-047-PC?bidId=>.

² Stanford University. 2018 General Use Permit. “Transportation. Accessed April 8, 2019. ”<https://gup.stanford.edu/transportation>.

ORGANIZATIONS, BUSINESSES, AND INDIVIDUALS

D. United Nations Association of Oakland D.A.R.P. Program (dated January 4, 2019)

Comment D.1: Please note upon receipt of this written and USPS delivered written communication the surrounding community residents has taken receipt of the project display board announcing the PUBLIC NOTIFCATION of the above named proposed construction project on behalf of the SOBRATO ORGANIZATION interest.

Also, please note, in the interest of the same surrounding residents (sic) concerns, this agency named UN [Assoc. of] Oakland, is providing formal notification the address known and numbered as 2111 thru 2117 University Avenue has been named as one of several surviving historic landmarks so designated during the former active years of the East Palo Alto Historical and Agricultural Society [1992 thru 2001] and recently entrusted to the Ravenswood Community History Survey.

Considering the lengthy association, I personally, have endured with your colleague municipal officials in areas of historic preservation of items belonging to this Older Ravenswood Community, it is of little surprise that claims of current ownership are taking place among commercial developers.

However, it remains quite unfortunate the SOBRATO ORGANIZATION, AMZAON, and DEVCON CONSTRUCTION has already severed, at least two, significant historic arteries and the historic CHARLES DREW MEDICAL FACILITY BLDG. is slated for redevelopment as reflected within the PUBLIC NOTICE.

The story of Dr. Charles Drew and his Pharmacy during and after the post WWII years will literally leave anyone speechless and considering the historic association to the legendary WWII Tuskegee Airman, it all took place in a place called Ravenswood, Ca. and long before any East Palo Alto surfaced. FYI – the name East Palo Alto reflected some political maneuver by the son of Lester Cooley and this part of history has yet to be disclosed to the public.

Also please note that formal communications reflecting our community member's interest in maintaining these historic structure (sic) has been directed to the surviving Charles Drew family members whom are associated with the Charles Drew School of Science and Medicine in So. California as well as to several interested business entities throughout the Bay Area.

There are dozens of sole-proprietary business owner/operators whom are desperate for office and commercial business development space [in East Palo Alto] and one being myself. One other prominent business operator took it upon his professional concerns to draft a formal Chamber of Commerce business plan for the City of East Palo Alto, today, that same business operator tenancy was terminated without just cause within the 2111 University Ave facility....

In general, my past experiences suggest noticeable oversights in the preservation of valued historic structures has reflected in the visible deprivation of needed "life sensitive" resources such as knowing ones (sic) history. And without such, one's failure is almost imminent.

The address of 2111 University Ave reflects the location of one of several associated structures during the mid 1940's era and your displayed configuration reflects more than just one parcel address when there were several structures associated with the, now vacant, multiple parcels.

The concerned public has a right in knowing how the property was purchased by the City of East Palo Alto and subsequently sold to the SOBRATO ORGANIZATION with DEVCON the assigned contractor.

To further clarify our concerns of inadequate previous EIR studies and CEQA compliances performed within several significant redevelopment projects preceding both University Square, University Circle, Bell Street Park Etc., I have also included for your digest a duplicate of a recent written correspondence directed to the office of North Santa Clara County Supervisor, Joe Simitian and in response to Stanford University's overwhelming presence within this historic community.

Since my business startup within Ravenswood Industrial Park, I am certain there exist some noticeable and invisible historic voids that cannot be explained without further investigation and mutually arranged, off-line, dialog among community, school district(s), municipal, County and possibly State administrators.

The planning of the 2nd Decade Regional meeting of Mid-peninsula Historians was intended as a formally managed [UN]ESCO [Educational, Scientific, Cultural Organization] recognized efforts to improve cultural development however, the City of East Palo Alto must first recognize it has not served this community's best interest in the preservation of historic possessions.

I'm certain you can appreciate my continued efforts at sharing these concerns and you can anticipate our presence at every stage of the proposed development of the Charles Drew historic structures.

Response D.1: The University Plaza Phase II Initial Study (Attached as Appendix A to the Draft EIR) addresses historical resources on the project site. None of the existing buildings on the project site are listed on the City's inventory of historic resources and none would be eligible for listing on the California Register of Historical Resources or the National Register of Historic Places. In addition, a historic property survey report was prepared by AECOM in January 2017, for Caltrans for a project (a pedestrian overcrossing of US 101) that overlaps with the proposed office project.³ The survey report found that based on the history of the buildings and various alterations that have occurred over the years, none of the buildings (including those at 2111 University Avenue) would qualify as historic resources. For these reasons, the Draft EIR adequately addresses historic resources on the project site and impacts of the project would be less than significant.

³ AECOM. *Historic Property Survey Report*. January 9, 2017.

E. Envision, Transform, Build – East Palo Alto (dated February 7, 2019)

Comment E.1: On behalf of the Envision, Transform, Build – East Palo Alto (ETB-EPA) Coalition, we thank you for the opportunity to comment on the draft Environmental Impact Report (“DEIR”) for the University Plaza Phase II Project (“the Project”). We previously submitted comments on the Notice of Preparation for this project and feel strongly that much of the information and analysis we requested in that letter is not contained in the DEIR.

As you are aware, ETB-EPA is a coalition of nonprofit, community and faith-based organizations, residents, architects, planners and youth, engaged in land use, planning, and development issues in southern San Mateo County for over eleven years. We were active in the development of East Palo Alto’s Ravenswood/4 Corners Transit Oriented Specific Plan, as well as the recently updated General Plan. We also commented extensively and negotiated on both of the Facebook development projects securing substantial community benefits for low-income residents of EPA and Belle Haven

Accordingly, we use as a backdrop for this letter, the lack of responsiveness to some of the issues discussed in our initial NOP letter and submit the following comments to the DEIR.

Response E.1: This introductory comment does not raise any issues about the adequacy of the Draft EIR; therefore, no further response is required.

Comment E.2: Induced Demand for Housing Ignored. In ETB-EPA’s five-page NOP comment letter for the Project, we requested that the EIR evaluate and study the Project’s impact on the local housing market, and specifically the consequences for renters and low-income residents in EPA. The evaluation is not included in the DEIR. Instead, the DEIR states in Section 4.0: “The proposed project would help the City move towards a stable jobs to housing ratio in accordance with its General Plan and within the City’s urban boundary; therefore, the proposed project would not have a significant growth inducing impact.” DEIR at p. 115.

The aforementioned Section 4.0 Growth Inducing Impacts treats this issue with less than 300 words and relies solely on an ill-explained jobs to housing ratio argument. It ignores or perhaps purposely fails to point out that by approving the Project, EPA’s jobs-housing balance will improve, but at the cost of new Project employees relocating to EPA and thereby increasing pressure on the existing housing stock and causing a concomitant increase in housing prices. The DEIR beggars (sic) belief by stating that the Project, which includes over 500,000 square feet of new development and brings hundreds of new workers to our small town, will “not have a significant growth inducing impact.” The DEIR’s failure to properly evaluate – the induced demand for housing created by the Project is legally deficient.

Response E.2: Housing affordability and availability are not directly environmental concerns to be addressed as CEQA issues. Rather, the City will address indirect housing effects and economic development in the staff report for the project. To that end, a Housing Needs and Displacement Assessment and Fiscal Impact and Educational Analysis Report were prepared for the project by BAE Urban Economics. These reports will be discussed within the staff report and included as attachments.

As stated at the beginning of Section 4.0 Growth-Inducing Impacts of the Draft EIR, a project would have a significant impact if it exceeds local population projections, accelerates housing development in an undeveloped area, or introduces extensions of utilities and/or infrastructure that could lead to new development. The proposed project would provide for planned growth in a jobs-poor, urban infill area with existing utility connections and services. The project would be consistent with the City's General Plan. For these reasons, the Draft EIR adequately addressed the issue and found that the impact would be less than significant.

Comment E.3: Project's Potential to Contribute to Indirect Displacement Not Discussed. The DEIR's failure to evaluate the Project's induced demand for housing also results in inadequate discussion of potential displacement effects. The DEIR states "There are no existing housing units on the project site. No housing or people would be displaced as a result of the proposed project." DEIR Appendix A: Initial Study, Dec. 2018 at p. 70. While it is true that no housing units will be demolished causing direct displacement, the DEIR contains no analysis of the impact of indirect displacement, i.e., displacement of mostly lower-income families that occurs when rents increase due to increased land values and an influx of higher-wage earners. The DEIR thus ignores the Project's potential to contribute to the displacement of existing low-income residents residing in East Palo Alto.

Response E.3: CEQA does not address the indirect displacement of people due to economic development. As stated in the Initial Study in Section 4.11 Population and Housing of Appendix A to the Draft EIR, a project would result in a significant impact if it induces growth in areas where it is unplanned or if it directly displaces existing housing or people. The infill development site is planned for intensive office growth and does not contain housing or people that would be directly displaced. Thus, the proposed project impacts would be less than significant, as described in the Draft EIR.

As described previously, the City will address housing and economic concerns related to the project in the staff report based on a previously prepared Fiscal Impact and Educational Analysis Report and Housing Needs and Displacement Assessment Report. These reports will be attached to the staff report.

Comment E.4: The DEIR Underestimates Job Growth Generated by the Project and Uses Inconsistent Factors. The DEIR underestimates the likely job growth that is associated with the development of the Project. It appears that at least two different factors are used to calculate the number of assumed jobs generated. The DEIR cites that "assuming 165 square feet of office space per employee, the proposed project would bring approximately 1,400 jobs to the City." DEIR Appendix A: Initial Study, Dec. 2018 at p. 70. However, within the Hexagon Traffic Analysis the following statement is made: "The project employment was estimated assuming 4 employees per 1,000 square feet. Multiplying the estimated number of employees (928)..." DEIR Appendix E: Traffic Impact Analysis, Nov 20, 2018 at p. 50. The DEIR's use of two completely different assumptions about job growth is internally inconsistent, and suggests that the estimates were self-servingly modified depending on whether the developer wishes the numbers to appear high (to

appear like valuable economic development opportunity) or low (to appear like there will be less of a traffic impact).

Moreover, it is well-established that there is a steep downward trend in square-footage per employee, and offices for high-tech companies like the ones proliferating throughout the Bay Area tend to house approximately one employee per every 150 square feet—or less. See, e.g., *As Office Space Shrinks, So Does Privacy for Workers*, N.Y. Times (Feb. 22, 2015). Because of the high likelihood that new office space will be occupied by high-tech companies, the DEIR should use that assumption when estimating cumulative job growth. Otherwise, the DEIR fails to disclose all likely environmental impacts, as CEQA requires. Using the appropriately conservative assumption of one employee per 150 square feet, job growth for the Project could amount to 1,546 new jobs—over 50% of what the Hexagon estimates and 10% over the initial study figures. The only way to rectify such significant undercounting is for the developer to redo the analysis with the proper estimates and re-release the DEIR.

Response E.4: The reference cited on Page 70 of the Initial Study (Appendix A to the Draft EIR) was incorrectly extrapolated. The article included a total of 320,000 square feet of development when estimating the total number of workers Amazon employs in East Palo Alto, which would result in a ratio of 230 square feet per employee. Using that increased ratio, there would be approximately 1,008 employees associated with the project (the correction has been noted in Section 4.0 Draft EIR Text Revisions). The Draft EIR for the proposed project uses the consistent number of 1,400 estimated jobs. Thus, the Draft EIR likely overestimated the total number workers. This overestimate means that the analysis in the Draft EIR was conservative. Fewer jobs would result in potentially fewer environmental impacts. For these reasons, the level of impacts described in the Draft EIR would be the same (or less) and recirculation would not be required.

The Hexagon Traffic Impact Analysis (TIA) uses 928 employees for the vehicle miles traveled (VMT) analysis. The VMT analysis in the TIA is for informational purposes only, since the City of East Palo Alto has yet to adopt a VMT policy or impact thresholds per Senate Bill 743. The trip generation estimates, on which the TIA is based, utilize the industry standard Institute of Transportation Engineers Trip Generation Manual, 9th Edition (2012) are calculated based on the total amount of office square footage, not the number of employees. The difference in the number of employees would not change the impact determinations of the Transportation/Traffic section of the Draft EIR and recirculation is not required.

Comment E.5: Cumulative Impact Analysis Incomplete and Flawed. The DEIR fails to consider and adequately quantify the impact of all relevant projects when considering the Project’s cumulative impacts. The DEIR considers the aggregate impacts only of projects within the City of East Palo Alto, despite the fact that nearby projects will also contribute to cumulative impacts on traffic, population and housing by bringing large numbers of new employees to the very same area as this Project. CEQA requires that a cumulative impacts analysis consider all “past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those

projects outside the control of the agency.” CEQA Guidelines §15130(b)(1)(A). The DEIR has relied on too narrow a scope of analysis.

For example, the DEIR fails to consider in its cumulative impact analysis the impact of the nearby Facebook Expansion Project and their proposed Facebook Willow Road Project, which will have significant impacts on traffic, population growth and housing demand in the same area as the Project.

These two ignored projects represent an almost 3-fold increase over the number of new jobs the DEIR estimates for the cumulative effect of projects in the area—without even taking into account the likely multiplier effect of bringing these new jobs to the area. The DEIR fails to provide an explanation of why it has so artificially limited the geographic scope of the cumulative impacts analysis for, traffic, population and housing, as CEQA requires. See CEQA Guidelines § 15130(b)(3) (Lead agencies must “provide a reasonable explanation for the geographic limitation used” for a cumulative impacts analysis.).

In addition, per the DEIR, ABAG is projecting that jobs in the City will increase from approximately 2,920 in 2015 to 3,540 in 2035. DEIR Appendix A: Initial Study, Dec. 2018 at p. 68. This change in job numbers is equivalent to 620 over a 15-year period. However, the cumulative increase in jobs generated by the Project and its sister building, University Plaza, across the street is almost 2,800 jobs that would be realized in seven years. This is a staggering 352% increase over the ABAG 15-year projection. Yet, no noteworthy cumulative impact analysis on population growth and housing demand was proffered in the DEIR. Lastly, we note that the proposed University Circle project, just a five-minute walk away from the Project has the potential to add an additional 1,000 jobs in close proximity. The DEIR’s failure to take these projects into account when evaluating cumulative impacts renders the analysis legally insufficient.

Response E.5: The City disagrees with the commenter. Page 31 of the DEIR states that, “For the purposes of this document, ‘reasonably foreseeable’ refers to projects that federal, state, or local agency representatives have knowledge of from the formal application process” and “are within a mile of the project vicinity and are large enough that a cumulative impact could occur”. The geographic range for cumulative impacts from traffic analyzed in the Draft EIR was wider than one mile. As described Response C.7, the Facebook and University Circle projects had not submitted a formal application to the City when the NOP was circulated; therefore, the DEIR adequately addresses cumulative projects and does not need to be recirculated.

Comment E.6: **The Local Indirect Job Creation Multiplier Effect Was Not Studied.** The DEIR should have accounted for the nexus between higher-income future tech office employees and the subsequent multiplier effect these new jobs have on lower-wage job creation. This multiplier effect will add many new jobs to the local economy that pay less than a sufficient wage to house these lower-income workers locally. This will require new lower-wage workers to travel farther to work, thus increasing traffic congestion, vehicle miles traveled and greenhouse gases. To the extent the new lower-wage jobs created by this multiplier effect move to EPA to avoid the commute, they would put pressure on the limited housing stock and increase housing prices – a crucial factor that the DEIR fails to assess.

Numerous academic researchers have found significant evidence of the presence of a local multiplier effect. Enrico Moretti, a scholar at UC Berkeley, has determined that for each additional skilled job created, 2.5 jobs were also generated in the local non-tradable goods and services sectors, and an additional unskilled job created 1 job in the local non-tradable sector. See Moretti, Enrico, Local multipliers American Economic Review: Papers & Proceedings 1-7 (May 2010). Furthermore, Moretti finds that highly skilled technology workers, such as those at Facebook, have a multiplier effect of five service jobs for each technology job. As an example, he cites Apple Computers directly employing 13,000 workers but generating 60,000 additional service jobs. 36,000 of those additional 60,000 jobs are lower paid, unskilled positions, such as restaurant or retail workers. See Moretti, Enrico, The New Geography Of Jobs.

All of the additional workers created by this multiplier effect would place demands on the local housing market, increase demand on our transportation systems and/or travel in vehicles that produce greenhouse gasses. By not taking into account the additional low-skilled jobs created by the Project, the DEIR fails to accurately determine the impact on housing needs, indirect residential displacement, traffic congestion, and air quality.

Response E.6: As discussed in Response E.2 and E.3, the indirect population displacement due to economic reasons is not an environmental impact under CEQA. Rather, a separate project-specific staff report will address those concerns based on a Housing Needs and Displacement Assessment and Fiscal Impact and Educational Analysis Report prepared for the project by BAE Urban Economics. The Draft EIR addresses direct traffic, greenhouse gas, and air quality concerns resulting from projected employment increases and vehicle traffic from the proposed project and nearby (cumulative) projects. Mitigation are included in the Draft EIR for project-level and cumulative air quality and traffic impacts.

Comment E.7: Park Shadowing Impacts. The DEIR shadow study shows the 125 foot, eight-story proposed building casting shadows on an active park and its playing field. We disagree with the conclusion in the DEIR that “A portion of the park to the north beyond the playground would be substantially shaded in the afternoons during winter months; however, this incremental increase in shading would not impact active park uses (only existing open areas planted with grass) and would be temporary as the sun moves westward during winter afternoons.” DEIR at p. 45. The areas referred to as “open areas planted with grass” are used by youth for pick up soccer and football games. Shading the area could make that impromptu playing field unseasonably cold. A more nuanced shadow study for the late fall and early winter months should be done. Alternatively, reducing the building’s height should also be studied within a revised shadow study. As we stated in our NOP letter, usable open space is a much-needed amenity in East Palo Alto, and any shadows cast on Bell Street Park reduce this scarce community amenity.

Response E.7: As suggested by the commenter, an additional shadow study was prepared for the project (see Appendix C). The revised study shows shadows cast by the existing trees on open areas of the park. While the City of East Palo Alto does not have a threshold or policies related to shadow impacts, the Draft EIR states that the Bell Street Park is already heavily shaded by the existing mature trees bordering the

park. Additional shading due to the project would occur during the winter months (December through March) in the afternoons. As shown in the detailed shadow analysis in Appendix C, the proposed project structures would contribute to shadowing of open spaces at the park. Given the tall trees present that already shadow the park during the winter months, the project would not substantially increase shadowing or conflict with policies related to shadowing (because the City does not have any). Thus, the Draft EIR's conclusion of a less than significant shadow impact is further substantiated.

Comment E.8: Pedestrian Impacts. The University and Donohoe intersection is one of the busiest in the city, carrying a significant load of automobile, pedestrian and bicycle traffic. This vital intersection is a connection for EPA residents living on the Westside of East Palo Alto, particularly the many dozens of families with children who walk over the University Avenue bridge daily. The DIER states that there are less than significant impacts to pedestrians. DEIR at p. 98. However, widening of Donohoe at University will make an already long and difficult crossing for children, families, and seniors that much more difficult. In addition, the inclusion of two driveways on University, leading to and from the proposed 773 space parking garage, will make it more difficult for pedestrians to walk in this area. The DEIR should address these two issues and discuss mitigations to their impacts.

Response E.8: The City disagrees with the commenter. The widening of Donohoe Street would not preclude the use of existing pedestrian crosswalks and countdown timers. In addition, a new sidewalk would be constructed on Donohoe Street that is ADA compliant and two new traffic signals at Euclid Avenue and the US 101 northbound onramp would control traffic for pedestrian crossings. The new driveways on University Avenue would replace existing driveways that are currently used and would provide adequate site distance for entering and exiting vehicles to see oncoming pedestrians. For these reasons, the project and Draft EIR adequately address pedestrian access and mitigation no additional mitigation is required.

Comment E.9: 55% TSM Project Alternative. The DEIR describes this alternative but does not give sufficient detail to understand its viability as an achievable alternative. DEIR at p. 124. Without a more robust description of the methods and intensity of the TDM programs, the public cannot reasonably understand if this alternative should be championed or abandoned.

There are plenty of ways to reduce the Project's transportation impacts such as vehicle trip caps, vanpools to areas where employees live, departure and arrival incentives, pricing of parking, penalties for not meeting the set goals, showers and changing rooms for cyclists, etc.

Adopting measures like these and those mentioned in the EIR could get the Project to the 55% threshold. The EIR must identify why these measures are or are not feasible, and how many measures would be needed to reach a 55% threshold. The city could require the applicant to adopt and implement enough of these measures to ensure that the Project's impacts would be mitigated to a less than significant level.

Response E.9: Please see Response C.9.

F. Robert Miller (dated January 25, 2019)

Comment F.1: Great work on the environmental documents. My concern is that the Draft EIR is inadequate, because the Initial Study incorrectly labeled the Land Use/Planning b) as a Less Than Significant Impact. My concern stems from Land Use and Urban Design Policy 10.14 of the Vista 2035 East Palo Alto General Plan. Policy 10.14 reads as follows:

Ground floor retail. Require that ground floor retail space be included in new projects along the entirety of the University Avenue Corridor. This should be done in a way that creates nodes of pedestrian-oriented retail activity at key intersections (such as Bay Road, Bell Street, and Donohoe Street). Exceptions to requiring retail space within a project may be made when projects provide community benefits or meet other community goals.

There is no ground floor retail currently in the proposed project which will negatively impact air quality and job creation for EPA residents. Without restaurants in close proximity to the site, many employees will be forced to drive increasing air pollution. Additionally, no retail means a lost opportunity for local jobs for EPA residents. For these reasons, I believe the Initial Study Land Use/Planning b) needs to be addressed in the Draft EIR as a Potentially Significant Impact or Less Than Significant with Mitigation Incorporated.

Response F.1: A total of 4,100 square feet of community flex space has been added to the project as a result of discussions with the City. This information has been added to the project description as part of Section 4.0 Draft EIR Text Revisions. The community flex space would be located on the ground-floor of the parking garage, facing Donohoe Street. The flex space is proposed near the planned, signaled Donohoe Street intersection because it will provide the best access for pedestrians and visitors in vehicles, and provides for a more commercially viable location than the portion of the Project site facing University Avenue. For these reasons, the less than significant land use impact conclusions in the Draft EIR remain valid.

Comment F.2: Other concerns with the proposed project include the anticipated two-year construction period and no housing. For all the concerns/reasons mentioned above, I favor the Reduced Intensity Alternative with ground floor retail.

Response F.2: The comment does not identify any specific shortcomings of the DEIR analysis or mitigation measures, and no specific response is therefore required.

G. The Sobrato Organization (dated February 7, 2019)

Comment G.1: The Sobrato Organization (“Sobrato”) has completed its review of the Draft Environmental Impact Report SCH Number 2017052045 (“DEIR” or “Project EIR”) prepared to comply with requirements under the California Environmental Quality Act (“CEQA”) for the University Plaza Phase II Project (“Project”). The Project will be located on an approximately 2.5 acre parcel at 2111 University Avenue (“Project site”) in East Palo Alto, California (“City”). The Project is Phase II of a larger project – Phase I is the currently operational University Square Project

located at 2100 University Avenue, a 214,000 square foot (sf) office building (“2100 University”). 2100 University is leased to Amazon, and is home to the new East Palo Alto Career Center operated by JobTrain to provide a vocational training and comprehensive support services program. Our purpose is to work with City staff to bring this long process to a mutually beneficial conclusion, and we appreciate the opportunity to provide comments on the DEIR, which are as follows. General comments are first, followed by comments specific to particular sections in the DEIR.

General Comments. 1. The Project image used for the DEIR cover page and Initial Study cover page is outdated. This should be replaced with the most recent Project design in the Final EIR, with an explanatory note indicating that the image used in the DEIR and the Initial Study was incorrect. Our recommended image is included as Attachment A to this letter.

Response G.1: The comment is noted by the City. The Draft EIR cover was for illustrative purposes only and does not form the basis for any of the CEQA conclusions; therefore, it is not being included as part of the Final EIR revisions.

Comment G.2: 2. Discussion of the proposed traffic signal at Euclid Avenue and Donohoe Street is described at DEIR page 93, in Section 3.5 Transportation/Traffic. For clarity, discussion of this proposed improvement should also be added to Section 1.0 Introduction, and Section 2.0 Project Information and Description, in relevant subsections. For example, it should be added to Section 2.5.1, Site Design, on page 22.

Response G.2: The added text about the proposed traffic signal is included within this document in Section 4.0 Draft EIR Text Revisions.

Comment G.3: 3. We note the existing public park currently encroaches on the project site (see Attachment B to this letter, Sheet C1.0 of the Project’s Planning Set submitted in April, 2018). The DEIR should address the existing park encroachment onto the Project site, in all relevant sections of the document, such as in the Project Overview paragraph on page v. Sobrato is committed to correcting this as a perpetual park easement.

Response G.3: Clarification on the existing park and proposed easement is included within this document in Section 4.0 Draft EIR Text Revisions.

Comment G.4: Summary

1. Please make the follow minor additions shown in underline and deletions shown in ~~strikethrough~~ to DEIR page v:

“The project site is bordered by park and industrial uses to the north, school district office and school bus parking uses to the west...”

“The existing ~~four~~ three parcels would be merged into a single parcel.”

With regard to the second correction, Sobrato has continued to work with the title company since the preparation of the DEIR, and it is more accurate to identify the Project site as three

parcels. The same correction should be made to the identical sentence on DEIR page 17 in Section 2.0 Project Information and Description.

Response G.4: The corrected text is included within this document in Section 4.0 Draft EIR Text Revisions.

Comment G.5: Section 1.0 Introduction. 1. Tiering Should Be More Specifically Addressed: Because the Project EIR is tiered off the 2016 General Plan Update EIR, please include a more clear discussion of tiering to Section 1.2.1, Focusing the EIR, consistent with the Notice of Preparation for the Project (“NOP”) (the Project’s EIR “will tier off the previous analysis completed for the City of East Palo Alto General Plan Update EIR, where appropriate.”) It further explained that “[t]he EIR to be prepared for the proposed project will focus on evaluation of the project specific environmental impacts that were not addressed in the certified General Plan Update EIR.” It is important to clearly and specifically indicate that Project analysis is tiered, and to explicitly incorporate the entirety of the 2016 General Plan Update EIR by reference.

Response G.5: Tiering statements from the NOP have been added and are included within this document in Section 4.0 Draft EIR Text Revisions.

Comment G.6: Section 2.0 Project Information and Description

1. Add Proposed Retail to Project Description: The current Project proposal does include approximately 4,500 square feet of ground-floor retail space facing Donahoe Street, in the garage building, and this information should be added to the Project Description on EIR page 17, Section 2.5. Sobrato notes that with regard to the City’s General Plan Land Use and Urban Design Policy 10.14, the Project is consistent with the purpose of the policy, to create “nodes of pedestrian-oriented retail activity at key intersections (such as Bay Road, Bell Street, and Donahoe Street)”. The retail is proposed near the planned, lighted Donahoe Street intersection because it will provide the best access for pedestrians and visitors in vehicles, and provides for a more commercially viable location than the portion of the Project site facing University Avenue.
2. Transportation System Management Plan: Please add a foot note cross-referencing the City’s Municipal Code prior Chapter 10.32 (Transportation System Management Plan) and City’s current Chapter 18.30.110 (Transportation Demand Management), and noting the “TSM” is the functional equivalent of a Transportation Demand Management (TDM) Plan.
3. Section 2.6.1: Per the City’s General Plan at page 4-5, the “260 persons per acre” standard for the Mixed Use High General Plan designation is a purely residential standard. Please delete or add an explanatory note stating this is inapplicable to the entirely commercial Project.
4. Section 2.7: In DEIR Section 2.7, Project-Related Approvals, Agreements, and Permits, specifically list the following Project approvals:
 - a. Site Plan and Design Review
 - b. Lot Merger
 - c. Ministerial demolition, grading, building and occupancy permits.
 - d. Encroachment Permit (Caltrans)
5. Initial Study Project Description: These comments on Section 2.0, Project Information and Description, also apply to the Project Description included in the Initial Study.

Response G.6: Upon City discussions with the applicant on March 21, 2019 and with submittal of revised plans dated February 15, 2019, the project now includes 4,102 square feet of community flex space. The inclusion of this community flex space in the garage building, specific project approvals, and the clarifications about the TSM Plan and “260 persons per acre” have been added and are included within this document in Section 4.0 Draft EIR Text Revisions.

Comment G.7: Section 3.0 Environmental Setting, Impacts, and Mitigation. 1. Construction Timing: Please update the anticipated construction schedule on EIR page 31. The updated, anticipated construction schedule remains the same, two years, but should be Spring 2020 to Spring 2022.

Response G.7: The construction schedule has been updated and is included within this document in Section 4.0 Draft EIR Text Revisions. The revised construction schedule has also been incorporated into the air quality analysis included as Appendix B to this Final EIR.

Comment G.8: Section 6.4 Noise and Vibration

1. **Mitigation Measure NOI-1.1:** To ensure feasibility of construction on an urban infill site, Sobrato proposes revising the measure on EIR page 76 (and at EIR page x) as follows, with additions shown in underline and deletions in ~~striketrough~~ to achieve the same performance result in a manner more feasible for a large construction project:

To the extent feasible, ~~A~~avoid using vibratory rollers, tamper, or dropping heavy equipment within 20 feet of a shared property line. If avoidance is infeasible, perform vibration monitoring within 20 feet of share property lines throughout construction work, to ensure that construction-related vibration levels do not exceed the 0.3 in/sec PPV threshold (adjusting work and equipment as necessary to meet this standard).

Response G.8: This amendment has been incorporated into the project mitigation measure in Section 4.0 Draft EIR Text Revisions in order to more accurately reflect implementation feasibility.

Comment G.9: Section 3.5 Transportation/Traffic. 1. Beneficial Impacts of Project-Sponsored Traffic Improvements Should Be Addressed: This section of the DEIR currently does discuss the beneficial impacts of proposed Project related traffic improvements – both in the project specific and cumulative settings. As discussed in the Project’s Traffic Impact Analysis (“TIA”) and demonstrated in the data tables, planned Project-sponsored improvements “will improve access to and from the project site as well as significantly reducing existing congestion in the area. Compared to the existing unsignalized intersections, the new coordinated signal system will enhance the intersection capacity and minimize the queue spillback that currently impedes traffic flow on University Avenue and Donohoe Street.” Narrative discussion of these beneficial impacts should be added to the EIR, to reflect the service improvements shown in EIR Table 3.5-2 (significant service improvements between Existing Conditions and Existing Plus Project Conditions Without Loop Road for intersections 6, 14, 15, 16, 17, 18, and 20); and EIR Table 3.5-5 (significant service improvements

between Cumulative No Project and Cumulative Plus Project Without Loop Road for intersections 6 and 14-20). These service improvements are not, but should be, described and discussed in Section 3.5. Further, all of the above-identified beneficial Project impacts should also be addressed in the Summary section of the DEIR, starting at page v.

Response G.9: While CEQA does not specifically require an analysis of beneficial outcomes related to project improvements, additional text clarifying the improved traffic flow conditions has been added and is included within this document in Section 4.0 Draft EIR Text Revisions. The text revisions do not affect the impact assessment in the Draft EIR or the conclusions regarding the project alternatives.

Comment G.10: 2. Mitigation Measures C-TRAN-1.1 and C-TRAN-1.2: Because the impact on the intersections of Euclid Avenue and Donohoe Street/East Bayshore Road occur in the cumulative condition, the measures on DEIR page 102 should note that a fair share toward construction of the improvements is appropriate. While Sobrato is willing to initially fund these improvements as part of implementation of the Project, (1) we recommend that this improvement be added to the City’s Capital Improvement Program so that improvements can be credited against future fees, or (2) we reserve the right to seek a reimbursement agreement for the City to reimburse us over time as the City collects fees or fair share contributions from benefitting projects.

Response G.10: The mitigation measure language has been clarified in Section 4.0 Draft EIR Text Revisions.

Comment G.11: 3. Mitigation Measure C-TRAN-2.1: The fair share contribution identified in this measure is appropriate, but Sobrato requests that the fair share be more specifically identified. And, we recommend that this improvement be added to the City’s Capital Improvement Program and any fair share contribution be credited against future fees.

Response G.11: The mitigation measure language has been clarified in Section 4.0 Draft EIR Text Revisions.

Comment G.12: Section 3.6 Utilities and Service Systems

1. Sobrato recommends the following additions shown in underline and deletions shown in ~~striketrough~~, for clarity:

On page 108, under heading Wastewater:

“Wastewater collection and conveyance services are provided to the project site...”

On page 108, under heading Storm Drainage:

“The existing project site is partially developed with office buildings, as well as paved and compacted graveled parking areas and is approximately 46 percent impervious roof and pavements, 40 percent compacted gravel, and 14 percent landscape.”

On page 109, under Thresholds of Significance:

~~“Have sufficient Require water supplies available to serve the project from beyond existing entitlements and resources, or are new or expanded entitlements needed...”~~

Response G.12: This requested text amendment has not been made. The language in the Draft EIR is consistent with that included in Appendix G of the CEQA Guidelines.

Comment G.13: Section 4.0 Growth-Inducing Impacts

1. **No Planned Unit Development Rezoning:** Per the General Plan and recently adopted Comprehensive Zoning Code Update, the Project is consistent with the MUH zoning and does not require a PUD, which should be corrected on DEIR page 115.

Response G.13: The mention of a PUD has been removed and is included within this document in Section 4.0 Draft EIR Text Revisions.

1. **Section 7.0 Alternatives. 1. Beneficial Project Impacts Should Be Addressed:** As described above with regard to DEIR Section 3.5 Transportation/Traffic, the Project’s planned traffic improvements would in fact have beneficial improvements on service conditions, which should be addressed more thoroughly in the EIR, including in Section 7.0 Alternatives. For example, a subsection 7.2.3 Beneficial Project Impacts could be added. For each relevant alternative, the loss of the identified beneficial impacts should also be addressed, particularly considering that improved traffic conditions is identified as a Project objective at DEIR pages 29, 119.

Response G.13: While CEQA does not specifically require an analysis of beneficial outcomes related to project improvements, additional text clarifying the improved traffic flow conditions has been added for the No Project Alternative and is included within this document in Section 4.0 Draft EIR Text Revisions. Because it is speculative whether the improvements would be required under the Reduced Intensity Alternative and 55 Percent TDM Alternative, this text amendment has not been included for those alternatives. The text revisions do not affect the impact assessment in the Draft EIR.

H. Noemi Mendoza (dated February 7, 2019)

Comment H.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am Noemi Mendoza, a 17-year-old senior at East Palo Alto Academy. My connection to the community is a deep connection due to the fact that I was practically raised in the town. I lived in East Palo Alto up until the 6th grade but I continued to attend school in East Palo Alto.

I would like to raise concerns to your attention regarding Draft Environmental Impact Report:

1. Traffic is a huge impact on the community. Every day there's a traffic jam. In the morning, there is traffic on Pulgas going towards the post office. In the afternoon, there is traffic all the

way down University. In my personal experience, I have to drive myself every day to school as well as back home, and it takes me 20 minutes to exit East Palo Alto and onto 101, which is only 2 miles. When Amazon “moved in” to the community, the traffic began to grow and my time, in traffic, grew 5 minutes. If another big company “moves” in, then imagine how much traffic will increase?

2. The necessity of the building is concerning. When the other building had first opened, everyone was so very excited because it was something new and we had bad experiences with Facebook obtaining properties and rent rises for the people. Everyone was excited because there was a new option for people looking for a serious career in Amazon or a job in a general. Amazon was considering it until they weren't anymore. How will this building benefit the people in ways the other building couldn't?

In summary, this building worries those who are trying to make it out in East Palo Alto and this infrastructure is bringing up concerns that the community has on East Palo Alto's future as a united city of color.

Response H.1: Traffic from the proposed project is addressed in Section 3.5 Transportation/Traffic of the Draft EIR. The Draft EIR evaluated traffic impacts in the project area based on the City's impact criteria. The project will result in significant project-level impacts at freeways and cumulative-level impacts at area intersections. Implementation of MM-C-TRAN-1.1 through 1.3 would lessen project cumulative impacts. Project-level traffic will actually improve in the vicinity at ten intersections as a result of proposed project improvements including:

- **US 101 Northbound On Ramp/Project Driveway (Future) and Donohoe Street:** The US 101 northbound on ramp will be shifted approximately 30 feet to the east to align with the project driveway on the north side of Donohoe Street and a traffic signal will be installed at this new intersection and coordinated with other closely spaced traffic signals along Donohoe Street. In addition, the westbound Donohoe Street approach to the US 101 northbound on ramp will be restriped to accommodate a short exclusive left-turn pocket (approximately 60 feet in length), a shared left/through lane, and an exclusive through lane. These improvements would require widening of the US 101 northbound on ramp to accommodate two lanes that taper down to a single lane before this ramp connects with the loop on ramp from northbound University Avenue.
- **Euclid Avenue and Donohoe Street:** A new traffic signal will be installed at this intersection and coordinated with other closely spaced traffic signals along Donohoe Street. The westbound approach on Donohoe Street shall be restriped to accommodate an exclusive through lane and an exclusive right-turn lane, both of which extend from the US 101 northbound on ramp/Project driveway intersection.

The commenters concerns about the building and its economic and housing-related impacts are noted. CEQA, however, does not address indirect economic concerns from new projects due to rising rents and potential employment. The City will

address housing and economic concerns related to the project in a separate staff report. A Fiscal Impact and Educational Analysis Report and a Housing Needs and Displacement Assessment Report, both prepared by BAE Urban Economics, will be attached to the staff report. These reports discuss in detail the economic impacts of the proposed project on the City of East Palo Alto.

I. Patty Cornejo (dated February 7, 2019)

Comment I.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am Patty Cornejo. I am a high school senior at East Palo Alto Academy. I have been a resident of East Palo Alto since the day I was born. I am now 17 years old, turning 18 in November 2019.

I would like to raise concerns regarding The Draft Environmental Impact Report:

1. It's getting too expensive to live in East Palo Alto.
 - a. Housing expenses in East Palo Alto have gone up dramatically ever since Amazon moved in on University Ave. From my own personal experience, my single mom raising four kids on her own, couldn't afford to pay rent anymore. She decided to buy a cheaper house in San Joaquin County. We moved out of the Woodland Park Apartments in September 2018. We had to leave our childhood memories behind.
2. Traffic in East Palo Alto has increased.
 - a. I believe traffic has increased ever since Amazon moved in. Around 4 or 5 p.m there is traffic on University Ave. People coming from Palo Alto and people driving home from work or school sit in traffic for at least 30 minutes every day. I myself have sat in traffic for so long just trying to get to a soccer game behind the St. Francis church. It is ridiculous. An article published by Kron4 News by reporter Rob Fladeboe says, "There are so many traffic problems across the region but Peninsula commuters can no doubt agree that the daily backup along University Avenue in Palo Alto is one of the worst." This proves that others do believe the traffic on University Ave has been the worst.

In summary, having a new project being built on University Ave would make things worse. This would worry the locals even more. Please see below for additional details and pertinent literature.

Response I.1: Please see Response H.1 for a discussion of traffic impacts and indirect housing issues related to the project.

J. Nancy Bazan (dated February 7, 2019)

Comment J.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am Nancy Bazan, an 18-year-old senior at East Palo Alto Academy. My connection to the community is due to the fact that I was raised in the town.

I would like to raise a couple of concerns to your attention regarding Draft Environmental Impact Report:

1. Traffic is a HUGE impact on this community. Every morning I leave my house to get to school and there is traffic everywhere. Every street I take is jammed in traffic. It usually takes me about 4 minutes to get to school, but with all the traffic that builds up every time there is a new building, the traffic jam increases dramatically. It now takes me about 10 minutes to get to school which is about 3 streets away from my house. I believe that if more companies “move in” then traffic is most definitely going to increase even more.
2. The necessity of the building isn't really a necessity. The building is only taking up space that no one can use or works there. From what I know the building was supposed to hire people from the community but no one from the community works there. Everyone was excited because there was a new option for people looking for a serious career in Amazon or a job in general. It's a big building that doesn't need the whole space.

In conclusion, the building shouldn't be here because it doesn't help our community and it brings concerns about East Palo Alto's future.

Response J.1: Please see Response H.1 for a discussion of traffic impacts and economic issues related to the project.

K. Esperanza Traelo (dated February 7, 2019)

Comment K.1: My name is Esperanza and I am 18 years old. I have been a resident in East Palo Alto for four years. I can connect to this community because I have lived here for a while and I have seen how East Palo Alto has changed. In these past four years, I have seen that it has gotten better about the violence. However, I have seen how so many people have had to move out.

I believe that we shouldn't build a new office building here in East Palo Alto due to their being so much traffic already and if it follows the previous Sobrato Building will not provide jobs for East Palo Alto. When going anywhere in EPA there is always traffic. For example, when I go home after school it takes me about an hour just to get to my house which is only 2 miles away. Sometimes when I'm on my way home I see people breaking traffic laws. People will go into opposing traffic to get to their place faster or run red lights. It makes it feel unsafe. When I am walking or crossing the street and they run red lights. I feel like East Palo Alto is not safe for the residents. If we get more traffic here then there will be more injuries and fatalities.

I believe we shouldn't approve this building as it currently planned in EPA is because then the house rent will get more expensive. People will have to leave due to not being able to afford housing anymore. When Facebook and Amazon got here the increasing demand raised the rent. Many of my family had to move out because the rent was too high and unaffordable. If you approve a new office building then rent might increase and more people will have to leave. The minimum wage is low so the higher rent will cause many to leave. Some of the EPA community barely made it through last increase of rent and they might not make it through this one.

Response K.1: Please see Response H.1 for a discussion of traffic impacts and economic issues.

While traffic safety due to illegal vehicular movement is not an environmental issue under CEQA, the project does include additional traffic signals, sidewalk improvements, and crosswalks to improve traffic flow and increase safety.

L. Ericka Ceron (dated February 7, 2019)

Comment L.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am Erika Ceron, I am 19 years old, in my senior year in East Palo Alto Academy. My connection with the community has been a long time, I have lived in EPA for four years and is a quiet and nice community.

I would like to make a short comment about two of the biggest problems that affect my community in EPA like the traffic and the rent, regarding Draft Environmental Impact Report: University Plaza Phase II Project:

1. Regarding Traffic
 - a. Right now in East Palo Alto it is difficult for people to get early to their job, for example when I take the bus to go school I pass more than two hours in the traffic and many time I'm late. Also, I have seen that is not safe for kids to walk in the street because they're a lot of cars who drive really fast that is why is good to stay in the home because go out is really dangerous and is difficult to be in one place to other.
2. Regarding Rent
 - a. Another concern for my community is the rent. Right now in East Palo Alto the rent has been the biggest problem for people of low income. also I see in my community is that many people are moving because the rent is too high and that make our community bad because all people who lived there a long time there are living there place where they have been familiar.

Response L.1: Please see Response H.1 for a discussion of traffic impacts and economic issues related to housing.

M. Herberth Trejo (dated February 7, 2019)

Comment M.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am 17 years old, and I am a student from East Palo Alto Academy. My family has been living In EPA all their lives, and I moved to EPA in 2017.

I want to raise concerns about the traffic problem in East Palo Alto. The problem with traffic is that it affects people's schedule. For example, my mother takes about a whole hour to make me home from school even when we live about 20 minutes walking. Not only that, after school, she has to either drop me off practice or work which waste her time more because she also has to take care of my little siblings and chores.

Another Reason why I brought up this concern is that it could be a safety hazard. More Traffic means more cars which can lead to accidents. Either with the vehicles themselves or pedestrians. I have

many cousins in Elementary school who walk home when school is over. So I'm also worried about their safety and other kids as well.

In conclusion, I think that traffic control is one of the most critical problems for the East Palo Alto city. Also, would adding more office buildings like the "University Plaza Phase II Projects" add more difficulties to traffic or would there be other solutions for it.

Response M.1: Please see Response H.1 for a discussion of traffic impacts and K.1 for a discussion of safety.

N. Maria Carbajal (dated February 7, 2019)

Comment N.1: Thank you for the opportunity to comment on the Draft Environmental Impact Report: University Plaza Phase II Project. I am Maria Carbajal. I am a high school senior at East Palo Alto Academy. I come from the State of Washington and have been living in East Palo Alto for 8 years. I have been fortunate enough to see East Palo Alto turn into the city it is now, new buildings, new homes, and how the population in East Palo Alto has grown. I am now 17 years old and will be turning 18 in June 2019.

I would like to raise concerns regarding The Draft Environmental Impact Report:

1. It's getting too expensive to live in East Palo Alto.
 - a. Housing expenses in East Palo Alto have gone up dramatically ever since Amazon moved in on University Ave. From personal experience, when my parents were looking for a place to live, my mother had to lie and say that they only had two children instead of four in order to live in Woodland Park Apartments. Eventually, we later found a house we could rent but only because my parents worked extra hours and saved money to move out. Now that Amazon has joined the community many residents from East Palo Alto are moving out of the city due to the rent and housing prices rising.
2. Traffic in East Palo Alto has increased.
 - a. I believe traffic has increased ever since Amazon moved in. Around 4 or 5 p.m there is traffic on University Ave. People coming from Palo Alto and people driving home from work or school sit in traffic for at least 30 minutes every day. Traffic has been a problem in East Palo Alto, due to the new companies that have come into our neighborhoods such as Amazon.
 - b. An article published by Kron4 News by reporter Rob Fladeboe says, "There are so many traffic problems across the region but Peninsula commuters can no doubt agree that the daily backup along University Avenue in Palo Alto is one of the worst." This proves that others do believe the traffic on University Ave has been the worst.
3. 30% of Workforce From the City.
 - a. With big companies coming into the city, many people have trouble finding good jobs that allow them to have enough money to pay rent, and pay bills. East Palo Alto has an ordinance that requires large employers to hire at least 30% of their workforce from the city when Amazon came into the city they made a deal with the council to bypass the ordinance. This made a lot of people from the community upset and

residents, along with students from East Palo Alto Academy, picket in front of the Amazon offices.

- b. Having 30% of the workforce from the city will make residents more comfortable bringing in future companies. It will also allow the residents of East Palo Alto to interact with the employees of the new building. I believe that the ordinance should become a form of a law that should be done by new companies coming in. I strongly believe that having 30% of the workforce as a law will make residents feel like they have an opportunity to have a good paying job.

In summary, having a new project being built on University Ave would make things worse. This would worry the locals even more. Please see below for additional details and pertinent literature.

Response N.1: Please refer to Response H.1 with regards to traffic and housing issues. The imposition of the first-source jobs rule is not a CEQA-specific environmental issue; rather, the City Council would decide whether and when to impose the rule or waive it for the project.

O. Benjamin Zarate (dated February 7, 2019)

Comment O.1: University Plaza Phase II Project. I am Benjamin Zarate-Bautista, I am 18 years old, and I am a student of East Palo Alto Academy High School. As a person who lives in this city, everything that happens here is something I need to know because it maybe can be good for me or maybe not. I have been living in East Palo Alto for 3 years.

I would like to raise concerns about the new project that maybe will be constructed at East Palo Alto, the new building. I do not approve this project because it won't be good for the city of East Palo Alto in many ways. The first one would be that because of this new building, traffic at university avenue is going to increase by a lot, just having the Amazon, traffic is a big problem for the citizens of East Palo Alto because they can't move to work fast or be on time where they need to be. Traffic won't be just one problem, rent will increase even more than what it did because of the building of Amazon, if the rent increases, even more, it would make people from East Palo Alto to move to different cities because of the rent. And last, for what I know, Amazon hasn't hired many people from this city to have a job in that company, I think that's something that people from East Palo Alto need to talk about.

In summary, I just think that I do not approve of this project right now because I don't see good benefits for East Palo Alto and its citizens.

Response O.1: Please refer to Response H.1 for a discussion of traffic and economic-related issues.

P. Ailyn Estrada (dated February 7, 2019)

Comment P.1: Thank you for the opportunity to comment on Draft Environmental Impact Report; University Plaza Phase II Project. My name is Ailyn Estrada and I am a senior at East Palo Alto Academy and a member of the East Palo Alto community. I have lived in East Palo Alto all my life.

I would like to raise concerns regarding the document "Draft Environmental Impact Report; University Plaza Phase II Project."

According to the article, the city is thinking about approving the construction of the 8-floor building in East Palo Alto. My concern is the proposal that the Sobrato Group has about traffic and which according to the article by the daily post by Emily Mibach says, "Improve traffic flow and safety with signalizations of the Euclid Avenue/East Bayshore Road/Donohoe street intersection and modifications to the northbound US 101 onramp . . ." the EIR does not make clear how serious our traffic situation is. It takes about 30 minutes to get from one side of the city to another. For example from Myrtle street to Ralmar, it's 1 mile which should take 6 minutes but takes 15-20 minutes during traffic time. I also believe that by you allowing the company to add another building which will be one of the tallest buildings in East Palo Alto, of course, it will cause more traffic because more people mean more transportation which equals more traffic. During and after construction. Being a resident of East Palo Alto, I know how frustrating it is to waste 30 minutes in traffic just on East Palo Alto, to get home when in reality it should only take about 5-10 min to get around the city. If this building is going to happen I think that it would be fair if the people who will work at the company should have different schedules so that traffic will increase. For example, morning traffic stats round 8-9am, it would be helpful if the workers started around 10 or 11 a.m. instead and should get out 2 hours after traffic hour in the afternoon.

Another reason why I don't feel you should approve the addition of an eight-floor building is that I feel that area can be of better use to the community. I think that it would be so helpful if the city allows the parking lot space to be also available to the residents of East Palo Alto. As we all know, parking in East Palo Alto is very difficult to find and there are even times where residents have to pay monthly to park on Menlo Park streets. This forces some people to wake up extra early to get up and walk all the way to their car to drive to work. I know this because both my stepdad and uncle had to wake up at 5:30 am to walk to Menlo Park streets to get to their car with an additional monthly \$35. So I feel that if we add a parking lot in that area that is available to the public it will benefit the residents of the city which is all that we ask.

In conclusion, I think that there are many reasons why our city won't benefit from your eight-floor building but traffic is one of our cities major concern. I also feel that if we can do something more useful with that space like parking lots, why shouldn't we? Please see below for additional details and pertinent literature.

Response P.1: Please refer to Response H.1 with regard to traffic issues.

The proposed project is compliant with the City's parking requirements as discussed in Section 3.5.2.9 of the DEIR. While parking is not directly a CEQA issue, comments regarding shared parking and street parking are noted for the decision makers.

Q. Karen Downs (dated February 7, 2019)

Comment Q.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am a seventeen years old student at East Palo Alto Academy, and even though I don't live in EPA I work in EPA and I care about the changes that are happening in EPA.

I would like to raise concern regarding the Draft Environmental Impact Report.

Interim City Manager Sean Charpentier, pointed out that people currently spend about 83 seconds at the Donahoe and University intersections waiting to get through. The students at EPAA including me know that there is always a lot of traffic on University and Donahoe, and always take about thirty minutes to go over the University bridge.

Regarding the project objectives, how do you plan on getting the people of EPA more involved? The Amazon building has been up for about two years. Going home from school I always past that building and wondered what is happening inside. I've never seen an EPA person work there. So why build a building in EPA that does not provide explicit opportunities for people from EPA in the workforce. In 2017 Sobrato and Amazon made a deal with the City Council to let the company bypass the city ordinance. Amazon agreed to help resident find jobs elsewhere, but there is no report of that having happened or success.

My concern is that your buildings don't include enough community input and cause us to stay even longer in traffic.

Response Q.1: Please refer to Response H.1 and K.1 with regards to traffic. As discussed in Response N.1, the City's first-source jobs rule is not directly an environmental issue under CEQA. Waivers of the rule are negotiated between project applicants and the City. The City allows for community input on the decision as part of Planning Commission and City Council meetings and hearings to approve the project.

R. Raul Jimenez (dated February 7, 2019)

Comment R.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am Raul Jimenez, a 17-year-old and I will be 18 years old in November 2019. I am a senior at East Palo Alto Academy. My connection to this community is a strong connection Due to the fact that I have lived in East Palo Alto my whole life.

I would like to raise concerns to your attention regarding Draft Environmental Impact Report:

1. Traffic is a huge impact on the community. On Monday- Friday there is a huge traffic jam that started when all the big named companies moved in around East Palo Alto. In the morning there is traffic going towards Palo Alto and around 3:30 there is traffic going towards the Dumbarton bridge. Although there are different routes to take those are also covered with traffic from the workers who work for those big companies. Time in traffic grew to 5 minutes, now imagine if this 8 story building is built the 5 minutes can turn into 10-15 minutes. Then realize how much traffic would increase?

2. Another concern that people have is the housing expenses are rising dramatically. One apartment for 1 room and 1 bathroom goes for 1,500-3,500, although houses in this area go for around 4,000 to 6,000. These prices started going up due to the fact that the employees of these new companies need a place to stay. And more apartment companies have raised their prices to get more money, but residents that have been living in East Palo Alto cannot afford are being forced to move out of this city.

In summary, this building worries those who are trying to make it out in East Palo Alto and this infrastructure is bringing up concerns that the community has on East Palo Alto's future as a united city of diverse ethnicities.

Response R.1: Please refer to Response H.1.

S. Vake Fonua (dated February 7, 2019)

Comment S.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. My name is Vake Fonua. I am a current senior at East Palo Alto Academy. I've lived in East Palo Alto for the past 10 or so years and my experience here has been great. My parents moved my siblings and me to East Palo Alto since the cost of living in San Mateo was too high. East Palo Alto is such a small city yet the culture and diversity make up for it.

I would like to raise concerns regarding the purpose of the Environmental Impact Report. With all the vacant lots East Palo Alto has to offer and new projects coming up, many residents aren't too sure about the changes.

One of the major concerns is the shortage of water supply for the new construction site. In the article, **East Palo Alto halts new developments due to water shortage**, "Seventy vacant acres in East Palo Alto must sit idle for now, putting jobs, affordable housing, and hopes and dreams on hold for at least two years." In order for the project to continue, East Palo Alto must negotiate with other cities into making a compromise for a sufficient amount of water for their new buildings. Since water is scarce, I feel it would be for the best to hold off on any new construction sites until there is a firmly established water supply. Building the 8-story building will cause my community to fall since water is so limited, we should be savoring it instead of using it all for some building. We need to think about the people living in East Palo Alto, water is an essential resource.

Another concern is the increase in traffic this new building will bring. In the article, **Plan to fix traffic congestion on University Avenue in Palo Alto**, "It turns out those lights, from roughly Middlefield Avenue in Palo Alto all the way to the Dumbarton Bridge in East Palo Alto, are managed by three different agencies, the two cities, and Caltrans." Although the lights are planning to be synced, traffic will still reign. There are many people who make a commute to East Palo Alto since they either work or have children going to school there. Traffic is already bad as it is. On University, Middlefield, and coming to and from the Dumbarton Bridge, cars are stuck waiting for more than 20 minutes within the small city of East Palo Alto to get where they are supposed to be. Especially when its the afternoon, children are out of school and adults are going home from work. With this new building, many residents will have to suffer through traffic longer than they already have to.

The last concern the 8-story will bring is the rise in rent. Despite the many job positions that will open with the building, it will also cause businesses to raise the rent. With the rent raised, many people will have to relocate to find affordable housing elsewhere. These renovations won't benefit those with a low-income. East Palo Alto is an affordable place to live, the majority of the community are minorities with low salaries. Housing is limited, there are only so many houses in a small city like this one. Many will be forced to move away from the only home they've ever known. For example, companies like Facebook and Amazon caused many residents who have been here for the longest to up and leave due to the increase in rent. It's so sad to see so many familiar faces moving out of East Palo Alto when they're whole life has been here.

In summary, this new building will bring opportunities yet so many setbacks that will be hard for my people and community to recover from. Short supply in water, traffic, and rise in rent is just the beginning but if this project continues then the consequences will worsen. Please take into consideration what has been said throughout this letter, the residents of East Palo Alto count on it.

Response S.1: As stated on Page 110 of the Draft EIR, with a permanent water supply transfer of 1,000,000 gallons per day (gpd) from the City of Mountain View and 500,000 gpd from the City of Palo Alto and the inclusion of water use efficiency features and conservation measures described in the City's General Plan and Municipal Code (e.g., water-efficient plumbing features, water efficient-irrigation fixtures, planting drought-tolerant plantings, etc.), there would be sufficient water supplies available to serve the project from existing entitlements and resources and new or expanded entitlements would not be needed in normal years. Compliance with the General Plan and Municipal Code requirements (along with increased water supply), would also reduce the potential for cumulative water supply impacts to a less significant level, as stated in the Draft EIR.

Please refer to Response H.1 and K.1 with regard to traffic and housing issues.

T. Meliza Gomez (dated February 7, 2019)

Comment T.1: Thank you so very much for the opportunity to comment and speak on the draft for the environmental impact report for the University Plaza Phase II project. I am a senior at East Palo Alto Academy. I was born in Stanford hospital and I have lived in East Palo Alto all my life. I was raised in a lovely community but at the same time, my community has undergone major changes. In these changes have impacted everyone living here but if I am frankly honest the changes that East Palo Alto has undergone within the past 10 years has impacted the whole country. For example, although Facebook is in the borderline of Menlo Park and East Palo Alto, the number of tourists that pass through EPA to take a picture of the Facebook Sign. Having corporations like these have had made major demographic and financial changes, and put East Palo Alto on the map. We are being looked at differently as a result of the new social and economic changes.

If we weigh the costs with benefits such as how much neighborhood violence has decreased, how many more jobs have been made available with the invitation of stores like Target and Home Depot. I worry about the fact that citizens in our community are already struggling to pay rent and the city

wants to bring in a building that will increase demand for housing. The current inhabitants of EPA already are struggling with the supply in the city and the increased pricing. Bringing in a new building will derail the focus of making EPA a place where the median household can afford to pay rent. With all this being said I would like to raise my concerns regarding the article, " Put Big building to vote...." According to the article, the city wants to approve the building of an 8 story building in East Palo Alto.

My biggest concerns are the proposals which states, "improving traffic flow and safety with signalization of the intersection and modifications to the northbound US-101 on-ramp." I am not sure that the big picture of resolving the traffic issue in East Palo Alto will be fixed with some lights and a ramp especially if the city is approving an 8 story building that will bring in more traffic, people, and costs. Not only will the city have to deal an additional 30 minutes to get from one end to the other end of the city which is less than 5 miles. The community will be in distress due to the existing conflict with traffic that will increase due to this 8-floor building. I also worry about the legacy of this community, the culture and the people obviously change but with corporations like Facebook in our backyard, Amazon in the middle of our city and many more multi-millionaire companies. I worry about how many more friends I will have to say goodbye to because they can't afford rent. I worry about how demanding the economy can get that all impoverished families will have to abandon their homes because instead of the community city council approving more buildings for affordable housing they are approving plans for an 8-floor corporate office space for the enrichment of the rich.

In summary I strongly believe that the community needs to be heard this time around, I would hate to see what happened with Amazon happen again, According to Palo Alto online, "East Palo Alto's long-standing first source jobs rule-of-hiring up to 30% of local residents at new businesses have been set aside but the city council to make way for Amazon on the new University square project." This behavior is negligent and it should not be tolerated another time around.

Response T.1: Please refer to Response H.1 with regard to traffic and housing affordability issues.

U. Jaquelin Henriquez (dated February 7, 2019)

Comment U.1: Thank you for the opportunity to comment on the Draft Environmental Impact Report: University Plaza Phase II Project. I am Jaquelin Henriquez, 18 years of age and a senior at East Palo Alto Academy who drives on a daily to and from home to school and work in Palo Alto. My family has lived here since 1995. My cousins and family know no other city than East Palo Alto. So to speak, my family has seen the drastic changes that our city has gone through and feel no happiness out of it.

I would like to raise concerns/ inform you of new information/ provide supporting evidence regarding [Purpose of the environmental impact report]. The first point I am making is the increase in traffic it will cause the community traveling in an out of university. Not only do we already had willow road doing construction, but also we do not know when that will finish. As said in the document, "The environmental impacts associated with the proposed project are primarily related to aesthetics, air quality, noise, transportation/traffic, and utilities and service systems resource area." Not only am I a new driver but I've also lived through amazon's traffic and noise they had caused

when building. The nearby house owners/renters have newborns at home or have kids who wake up early the next day for school. Noise will impact their behavior and participation in class when they do not get enough sleep.

The second major point is changing the whole aspect of changing the city. For one the community members do not work at one of the major projects that the city has endorsed, Amazon. It may be certain community members do not have the amount of education to work for them, but even giving them the chance to view the building inside and what it's doing for the community would be better than having nothing. On top of this, Amazon did not accept people from the community, which will be different from this EIR project? "...contribute to the city's tax and job base, and provide flexibility to support companies to grow." This is from the [Project objectives, #2] where not only will this help our community but will there be more for us?

In summary, I've been in the community and see what has happened. I personally oppose having this building be constructed due to the loss of businesses already in the space. My grandparents use the pharmacy in the space where this 8 story building will be built if this project is approved. It will be a tragedy for the pharmacy to just disappear. In the end, it's a 50/50 good and bad use of space for the building, but no one will love to sit in traffic or see the building there with no one from the community. Let's not get ahead of ourselves, the community does not approve of this project to change our city.

Response U.1: Please refer to H.1 and K.1 with regards to traffic and Response N.1 with regards to use of local labor.

Section 3.4.2.5 of the DEIR addresses noise impacts from the project during construction. The project would implement MM NOI-2.1, which limits construction hours, requires noise suppression devices and techniques, requires that a noise logistics plan be prepared, and requires a disturbance coordinator be appointed to respond to complaints about construction noise. With implementation of MM NOI-2.1, the project would have a less than significant construction noise impact (as stated in the Draft EIR).

V. Manny Perez (dated (February 7, 2019)

Comment V.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am a student at East Palo Alto Academy and I am 18 years old. I have been a resident for about 14 years in this community. I have many connections in this community, I go to the Boys and Girls Club and get help doing my homework, and get advice about the future.

I would like to raise concerns regarding The Draft Environmental Impact Report: University Plaza Phase 2 Project.

A major point I will be introducing is the traffic in University. I usually walk down the bridge to go to school. Most of the time I see this traffic that is nonstop. It starts around 7:30 and goes up to like 10. A lot of people stay stuck for 30 mins in this awful traffic. We need to find a better way for

people to travel without being late to work, school, etc. Personally, I think the bridge is big enough, but the lights were messing up for letting other lanes go for a long time than the others. This needs to stop now.

My second major point is on how East Palo Alto is trying to build an 8 story building. This does not help the cause of our situations. Allowing more large buildings are forcing neighbors to move out of the city and find another community. Most of the people have been living here about 10+ years. It's not right for East Palo Alto to allow this. We need to stop this project in order to save our neighbors. Plus adding the rent, this building might need money, and that would be stealing from us through high rent. This is not a friendly gesture to our community that tries to live in peace.

In summary, we should find a better solution for the traffic in university and make plans for the future. Also, protesting and denying the approval of the University Plaza Phase 2 Project.

Response V.1: Please refer to H.1 and K.1 with regards to traffic, traffic safety, and housing issues.

W. Minu Tupou (dated February 7, 2019)

Comment W.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. My name is Mino Tupou, I am 17 years old, I am a student at East Palo Alto Academy and as well as a resident in East Palo Alto. Living in East Palo Alto has pros and cons but I think the difficulties in East Palo Alto have to do with jobs with the residence and the new construction in East Palo Alto.

I believe that the city council in East Palo Alto give lost hopes to East Palo Alto residents by stating that when "East Palo Alto's has first-source jobs the rule is to hire up to 30 percent of local residents at new businesses has been set aside by the City Council to make way for Amazon in the new University Square project" (<https://paloaltoonline.com/news/print/2017/03/22/epachangesfirstsourcehiringruletoaccommodateamazon>). However, when Amazon building was built jobs were not available for residents and many were upset. Many of the residents of East Palo Alto are low-income families and need jobs closer to home. It is difficult to see my own neighbors struggle when there are available jobs down the street. I would like to push this issue in helping families in East Palo Alto to have a stable life. Please note this is an issue that shouldn't be overlooked and should be fair to residents who live here.

Another issue in East Palo Alto that is a major concern and it's the new ideas of construction in East Palo Alto. When Amazon was built and the new building of Facebook it took a strain on residents in East Palo Alto. Traffic is increasing in East Palo Alto and many are frustrated because they travel far for work since work in East Palo Alto is limited. In Addition, since more big corporate companies are moving in East Palo Alto property tax in East Palo Alto are increasing. Many who lived in East Palo Alto must move out due to the increase of rent or simply they can't afford it. These two issues are major and many in East Palo Alto are struggling to make ends meet. New construction in East Palo Alto could be a positive change in our city but I feel the way things are going it's hurting our community rather than encouraging us to love the city we live in.

In Conclusion, I would like to state that jobs and construction aren't the only issues in East Palo Alto but it is tearing our communities apart. I would like to inform those reading my letter to know that I love my city and it's my home please don't force my family or even my neighbors to move out because promises were broken.

Response W.1: Please refer to Response K.1 with regards to traffic and Response N.1 with regards to the City's first-source rule.

X. Luis Villalobos (dated February 7, 2019)

Comment X.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am a resident of East Palo Alto and have been for 15 years and attend East Palo Alto Academy.

One major point in this community is promoting in-fill development by building up to 232,000 square feet of office space on existing commercial property consistent with the recently approved General Plan. In the article "Put big building to a vote: That's what one official says about this 8-story project" it mentions how this new 232,000 square feet the building would displace Drew's Pharmacy, which has been at University Avenue location for 45 years. Forcing it to shut down temporarily even would hurt its business dramatically. I personally have been to Drew's Pharmacy and have been going for a few years. This article explains how many community members of East Palo Alto are against this project.

Another major problem that I see is the 232,000 square feet building displace The Stanford Law Clinic East Palo Alto. The new building is going to be built next to The Stanford Law Clinic which would block the view. It's important that everyone knows were the community clinic, building anything that would impede someone from seeing where it is shouldn't be built.

A problem that I fear will happen is that the city of East Palo Alto will not try to enforce the hiring of 30% of its employees of the East Palo Alto. An example of this would be the Amazon building that was built a few years ago here in East Palo Alto. Have a big business move into our small community and not support us just feels like they're taking advantage of us. There needs to be an agreement where both parties get something in return.

In conclusion, I believe community members of East Palo Alto should hold a meeting with residents of the East Palo Alto community and see how we can come to an agreement. Having everyone voice head is important because you don't know who it affects.

Response X.1: Please refer to Response N.1 with regards to the City's first source rule.

The proposed project would demolish Drew's Pharmacy and the Stanford Law Clinic, however, CEQA does not address the loss of businesses unless the structures they are housed within (or the businesses themselves) are determined to qualify as historic resources. Section 4.4 of Appendix A to the Draft EIR discusses historic resources on the project site. None of the commercial buildings on the project site

were found to be historic under CEQA; therefore, the Draft EIR adequately addresses the loss of these buildings.

Y. Shana Brown (dated February 7, 2019)

Comment Y.1: Thank you for the opportunity to comment on Draft Environmental Impact report: University Plaza Phase II Project. I am Shana Pouleva Brown and I am a senior at East Palo Alto Academy High school. My parents have been residents of East Palo Alto or over 40 years and I have been a resident here for 18 years now. I am connected to East Palo Alto because it is my home.

I would like to raise concerns and provide supporting evidence on why it is not effective to put an eight-story building to vote on University Avenue. In my opinion, our community is already being taken over by companies such as Facebook and Amazon, bringing in another building that is 8 stories is going to cause more of the East Palo Alto residents to leave and continue to be in poverty. If bringing in this building will create jobs for the residents of East Palo Alto than by all means it is useful, but if it does the same thing that Amazon is doing then it will not be effective instead it will only cause the residents in East Palo Alto to rebel. My overall point is if this eight-story building can create some type of employment for the residents of EPA than it will be beneficial but if you are creating this building with the mindset of not employing EPA residents than don't build in our community.

Also, I would like to raise concerns about what this building will physically cause. For example, when Amazon was built it created an increasing amount of traffic causing so many peoples commutes to be hours long. Thinking about what this eight-story building will cause in increasing the people coming in and out of East Palo Alto and increasing the commute home. Traffic is already horrible in East Palo Alto why make it worse.

In summary, I believe that creating an eight-story building with the mindset of not employing EPA residents will not be effective instead it will cause more and more residents in EPA to go poor and it will cause horrible traffic for commuters and for the residents that live in EPA.

Response Y.1: Please refer to Response H.1 and K.1 with regards to traffic and safety, and Response N.1 with regards to the City's first-source rule.

Z. Sade Aquino (dated February 7, 2019)

Comment Z.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. My name is Sade Aquino, I am a senior at East Palo Alto Academy. I've attended school in East Palo Alto and been a resident all my life. I am currently 17 and taking US Government Class where I have taken an interest in the new projects being done in our community. As to my siblings as well, we were raised in East Palo Alto our whole lives. I have walked the streets of East Palo Alto at a young age. The community is so strong and connected. All my friends are also part of East Palo Alto's community.

I would like to raise some concerns about some projects being planned. I've read that the Sobrato group plans on building an eight-story building. My main concern is Drew's Pharmacy. Drew's

Pharmacy has been there for many years and has been an easy walking distance resource for many residents of East Palo Alto. My concern is where this pharmacy will go? People in the community will have to travel far to receive the medication they need and won't be able to be transported if the pharmacy is relocated. To add on to the pharmacy, I am concerned about the Stanford law clinic. The law clinic is to help clients in East Palo Alto. Students at Stanford come to represent their clients to help witnesses, other legal documents etc. They represent them in court if replacing this clinic residents in East Palo Alto won't have the resources everyone will need. This eight-story building will block the beauty of our city. The park, the YMCA and the Adult Center.

Traffic has been a major concern for many of the residents of East Palo Alto. So how will this new building contribute to the increase in traffic? As a teenager I work to provide a part for my family and traffic has caused me to be late for work and other errands. Many people I know have agreed. There are many people that go through East Palo Alto to get the Dumbarton Bridge. Traffic starts to appear around 3 pm now. It has become a big problem, being stuck in traffic for about 2 to 3 hours. Many students commute to school from different cities, cities like Hayward, Mountain View, and Redwood City. Traffic from Redwood City to East Palo Alto may take up to an hour when in reality it should take a 15 min drive. I can only imagine the new traffic that the new building will bring. Even kids from the community come late to school because of the traffic that should only take 10 minutes.

As a result of many projects being held by companies, for example, FaceBook, Google, and even Amazon. They are taking a big part of our community. Our city council is worried about water shortage, with all these new projects coming in, we fear that we won't have enough water for our community or even to share. Amazon had "promised" to give to East Palo Alto residents job opportunities but, pushed that aside. Many people are losing their home because of these companies, they can't afford their rent and work is not providing a lot of income. Our future for our kids is at risk. Schools are being shut down and bought. What will happen next? Kids have to move homes to afford rent and go to a different school where they're not familiar with. This is also a part of traffic since, kids are forced to be relocated and kicked out of homes, the school has become packed, as well as homes. I can connect this to my family, my little nieces have to be kicked out of school because projects are coming in and removing them. This year they will shut down another school, just watching the community we lived in since little hurts at the fact, that our precious memories and being replaced and erased. As a community, we are trying to get together in hopes of hearing our voice. Our community of East Palo Alto is slowly disappearing.

Response Z.1: Please refer to Response H.1 and K.1 with regards to traffic, Response N.1 with regards to the City's first source rule, and Response X.1 with regards to Drew's Pharmacy and the Stanford Law Clinic.

AA. Eduardo Virrueta (dated February 7, 2019)

Comment AA.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am Eduardo Virrueta, I am 17 years old and I go to school in East Palo Alto, at East Palo Alto Academy. I have been a resident of East Palo Alto for nine years. My connection to this community is good because I have lived here for a long time and I have seen how the community has changed so far.

I would like to raise awareness regarding Draft Environmental Impact Report: University Plaza Phase II Project. I don't think it would be a good move to build the eight-story building because it would cause more traffic than we already have. There is already enough traffic that we already here in university street and the new building would be right next to University Ave. I live over the ramp next to four seasons hotel and sometimes in the evening, the streets around my apartment get all full. Sometimes we even have to cancel plans because there is no way for us to get out into the streets since they are filled with cars.

Another reason I disagree with the building is that this building will not mean there will be more houses built. The building will create more jobs but if it does not create more houses then that will be bad for the community because more people will be trying to move into East Palo Alto and more of the people that live here will have to move out. It has never been fair that people that have lived here for a long time having to move out just because companies want to come here and cause the price of housing to increase, yet they don't provide reasonable support for the people of this community.

Another problem with this project is that there will be no job opportunities for the people of East Palo Alto. With this building, it will happen the same thing that happened with the Amazon building which did not help the people of this community very well. People of this community need jobs that allow them to afford to live here and to take care of their families. I think that if the project really wants to be done then that company will have to a hundred percent agree to have 30 percent of their employee be people from this community.

In summary, this building will would not really benefit the people of this community unless they agree to have 30 percent of their employees be people from this community. Even after hiring people from this community, there will still be more traffic and I doubt new houses will be built.

Response AA.1: Please refer to Response H.1 and K.1 with regards to traffic and housing issues, and Response N.1 with regards to the City's first-source rule.

BB. Krishneil Prakash (dated February 7, 2019)

Comment BB.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. My name is Krishneil Prakash and I am a senior at East Palo Alto Academy. I have been living in East Palo Alto since I was born which is 17 years.

I would like to raise concerns regarding The Draft Environmental Impact Report:

I believe traffic has increased ever since Amazon moved in. Around 4 or 5 p.m there is traffic on University Ave. People coming from Palo Alto and people driving home from work or school sit in traffic for at least 30 minutes every day. I've experienced this first hand on our school bus. Our school bus always gets stuck in traffic on the University and it takes about 20-30 min to get to my stop at the corner of Laurel Ave. and Newbridge St. which is ridiculous.

Another reason why I believe we shouldn't build this building in EPA is that then the house rent will get more expensive. People will have to leave due to not being able to afford housing anymore. Ever

since Facebook and Amazon arrived the increasing demand raised the rent ridiculously. It's almost the point where my parents can't afford to live here. So if the new 8 story building builds, how much more will rent increase to almost \$4000?

In summary, having a new project like this go through will it really benefit the community or the businesses coming in? If the Amazon can get away without hiring East Palo Alto residents why can't they? So overall I believe the approval for the new building isn't going to help anything in East Palo Alto.

Response BB.1: Please refer to Response H.1 and K.1 with regards to traffic, safety, and housing issues, and Response N.1 with regards to the City's first-source rule.

CC. Xiomara Constanza (dated February 7, 2019)

Comment CC.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am Xiomara Guadalupe Constanza Rodas, I am 17 years old and I go to East Palo Alto Academy. I have been living in East Palo Alto since 2015. Since 2018 I started working in Canopy, a tree care program, which has made me care more about my community.

I would like to raise concerns regarding Draft Environmental Impact Report: University Plaza Phase II Project]:

1. As a member of Canopy, I am concerned with the removal of the trees at 2111 University Plaza.
 - a. I think the removal of the trees is a significant issue because as a member of Canopy I have learned that trees give us a lot of oxygen and can help our air quality in East Palo Alto. This is an important issue because without trees the environment is going to be affected as well as people's health. With the building, it will interfere with the local communities (sic) ability to grow trees because of the lack of sunlight that will be available to the area around the building. The trees will help offset the increased traffic because the trees will help purify the air from the car's exhaust which hurts our air quality. Comparing aerial photos of East Palo Alto with Palo Alto there are obvious differences in the environment and the number of trees. In East Palo Alto diseases like asthma are more likely than in Palo Alto and Menlo Park. In the document Existing Conditions Report (<https://www.ci.eastpaloalto.ca.us/DocumentCenter/View/3051>) on page 221 states that people in East Palo Alto are more likely to be susceptible to air quality because "Rates of common health conditions such as asthma and myocardial infarction (otherwise known as heart attacks or cardiac arrest) are indicators of population health. Data for these conditions is available only at the zip code level (zip code 94303). This zip code includes all of East Palo Alto and also parts of Palo Alto. As such, the results for East Palo Alto are expected to be higher than those shown here since overall health conditions (such as life expectancy) are lower than in neighboring Palo Alto. In zip code 94303, which covers all of East Palo Alto . . ." This means we need trees to reduce the bad air equality and reduce the diseases as respiratory

diseases, lung cancer, and pneumonia which the report indicates are four and five in the list of most common causes of death.

2. The impact on the community by the potential loss of The Stanford Law Clinic.
 - a. I think that approving this building is going to affect many people in East Palo Alto because institutions like The Stanford Law Clinic will be displaced. A lot of people of the community of East Palo Alto is going to be affected because this clinic helps a lot of our citizens through free legal assistants. Displacing this clinic will be a significant issue because many people from the low income are going to be really affected by leaving them without help.

In conclusion, before making all this decision people should know more about the advantages and disadvantage of choosing to build in the community. My viewpoint is if you are going to approve this building you should let the clinic be part of the project. I would also like to see more trees planted around the building for a better environment and healthier atmosphere. I would like to see this project happen without negatively affecting people's health or the assistance that they require.

Response CC.1: Please refer to Response X.1 with regards to the Stanford Law Clinic. Section 4.3 in Appendix A of the Draft EIR discusses the removal of trees from the project site and consistency with the City's Tree Ordinance. The proposed project would replace trees in accordance with the City's Tree Ordinance with a goal of maintaining the urban forest.

DD. Juliana Espino (dated February 7, 2019)

Comment DD.1: Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am Juliana Espino, 17 years old and I am a student at East Palo Alto. My connection to the community is to help my community members join with others to create a better vision for our community. I've been in the resident for 17 years.

I would like to raise concerns regarding Draft Environmental Impact Report: University Plaza Phase 2 Project. The most likely cause of the issue of this impact project is that there's a lot of traffic coming around. After school, almost every day I go walking to the bridge by University Ave to go to Palo Alto to go to work. I see that there is a lot of traffic coming by each intersection. As I saw a few months ago I witness car crashed right in the middle of the lights by University. It was the scariest thing ever because someone could have got hurt by luckily no one got hurt. By the way, each time I order a Lyft or Uber it gets caught in traffic and it makes me get to work 10-15 minutes late by the cause of traffic.

My second major concern regarding housing is very disappointed because my aunt had to move from East Palo Alto to Gustine, CA because of the high rent. Her husband has to come all the way to Redwood City/ East Palo Alto to work because in Gustine there is not really that much of employment since there is basically all land. Therefore, the more buildings are being built the more people from the East Palo Alto community have to leave their city, when they've been a resident for a long time. It's sad when you have to leave your city when you've been spending years in your city and have to either get evicted or leave the city because the rent is too high. My mom is currently in that situation where she wants to move out to Modesto because she can't afford to live here anymore

In summary, please don't let no more buildings be built, fix traffic, and keep our water stable for those who need it.

Response DD.1: Please refer to Response H.1 and K.1 with regards to traffic, safety, and housing issues.

SECTION 4.0 DRAFT EIR TEXT REVISIONS

This section contains revisions to the text of the University Plaza Phase II Project Draft EIR dated December 2018. Revised or new language is underlined. All deletions are shown with a ~~line through the text~~.

Page and Section	Text Revisions
Page v; Summary, Project Location Appendix A, Page 6; Section 3.4 Project Location	<p>The project site is located at 2111 University Avenue and is approximately 2.5 acres. The project site includes four <u>three</u> parcels, Assessor’s Parcel Numbers 063-292-160, 170, 190, and 200 (<u>APNs 160 and 200 compose a single, legal parcel</u>). The project’s University Avenue frontage is currently developed with two one-story structures (occupied by retail and office uses totaling approximately 12,000 square feet) and associated surface parking. The parcel at the corner of University Avenue and Donohoe Street (not part of the project) is currently developed with an operating gas station. The project site is bordered by park and industrial uses to <u>the</u> north, school district office and <u>school bus</u> parking uses to the west, Donohoe Street to the south and University Avenue to the east. Regional, vicinity, and aerial maps of the project site are shown in, Figure 2.4-1, Figure 2.4-2, and Figure 2.4-3, respectively.</p>
Page v; Summary, Project Overview Appendix A, Page 6; Section 3.4 Project Description	<p>The project would demolish the two existing buildings on-site and construct an eight-story structure with approximately 231,883 square feet of office space, <u>4,102 square feet of ground-floor community flex space</u>, and a five-story, 284,094-square-foot parking structure with 773 parking spaces. Vehicular and bicycle access to the parking garage would be provided via a full-access driveway off of Donohoe Street and two right-turn-only driveways off of University Avenue. Pedestrian access would be provided to the structures from sidewalks along University Avenue and Donohoe Street. The existing four three parcels would be merged into a single parcel. <u>The project would grant a permanent right to the City for the portion of the existing City park built on the applicant’s property, (e.g. no-build easement, park easement or similar recordable agreement) to maintain the location of the park.</u> Three protected trees and 27 non-protected trees (30 total trees) would be removed from the project site to accommodate the proposed structures. <u>Four non-protected trees would be removed from within the Caltrans right-of-way.</u></p> <p>The project also proposes to shift the northbound United States US 101 (US 101) on-ramp approximately 30 feet east, to line up with the project driveway <u>and install a new traffic signal at the Donohoe Street and Euclid Avenue intersection.</u> Four trees would be removed from the Caltrans right-of-way to accommodate the relocation of the northbound US 101 on-ramp. The existing on-ramp would be removed and the area would be landscaped per Caltrans standards. A Development Agreement could be required (between the City and project applicant) for project implementation.</p>

Page and Section	Text Revisions
Page 15; Section 1.2.1 Focusing the EIR	<p>The City of East Palo Alto prepared an Initial Study (see Appendix A) that determined preparation of an EIR was needed for the proposed University Plaza Phase II Project, and was used to focus the EIR on the potentially significant impacts (CEQA Guidelines Section 15063(c)(3)(a)). <u>The EIR, in accordance with CEQA and CEQA Guidelines, will tier off the previous analysis completed for the City of East Palo Alto General Update EIR, where appropriate, and focus on evaluation of the project specific environmental impacts that were not addressed in the certified General Plan Update EIR.</u> The Initial Study concluded that the EIR should focus on Aesthetics, Air Quality, Noise, Transportation/Traffic, and Utilities and Service Systems resource areas. Energy is also discussed as it is a required analysis in an EIR. Agricultural and Forest Resources, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral Resources, Population and Housing, Public Services, and Recreation resource areas were analyzed in the Initial Study. The project’s impacts in these subject areas were determined to be less than significant or less than significant with mitigation included in the project.</p>
Page 17; Section 2.4 Project Location	<p>The project site is located at 2111 University Avenue and is approximately 2.5 acres in size. The project site includes four <u>three</u> parcels, Assessor’s Parcel Numbers 063-292-160, 170, 190, and 200 (<u>APNs 160 and 200 compose a single, legal parcel</u>).</p>
Page 17; Section 2.5 Project Description	<p>The project would demolish the two existing on-site buildings and construct an eight-story structure with approximately 231,883 square feet of office space and a five-story (seven-level), 284,094 <u>306,603</u>-square-foot parking structure with 773 parking spaces <u>and approximately 4,102 square feet of ground-floor community flex space facing Donohoe Street.</u> As shown on the conceptual site plan in Figure 2.5-1, vehicular and bicycle access to the parking garage would be provided via a full-access driveway off of Donohoe Street and two right-turn-only driveways off of University Avenue. Pedestrian access would be provided to the structures from sidewalks along University Avenue and Donohoe Street. The existing four parcels would be merged into a single parcel. Three protected trees and 27 non-protected trees would be removed <u>to accommodate the office building and parking garage as part of the project.</u> <u>Four non-protected trees would be removed from within the Caltrans right-of-way.</u></p>
Page 26; Section 2.5.2 Transportation Modifications	<p>The proposed project includes transportation system modification in the project vicinity. The US 101 Northbound On-Ramp would be shifted approximately 30 feet east to align with the proposed office project driveway on the north side of Donohoe Street and a new traffic signal would be installed at the US 101 Northbound On-Ramp/proposed office project driveway and Donohoe Street. <u>A new traffic signal would also be installed at the Donohoe Street and Euclid Avenue intersection and coordinated with other closely spaced traffic signals along Donohoe Street.</u> The westbound Donohoe Street approach to the US 101</p>

Page and Section	Text Revisions
	<p>Northbound On-Ramp would be restriped to accommodate an approximately 60-foot-long left-turn pocket, a shared left/through lane, and an exclusive through lane (as shown in Figure 2.5-5). These improvements would require widening of the US 101 Northbound On-Ramp to accommodate two lanes that taper down to a single lane before this ramp connects with the loop on-ramp from northbound University Avenue. Environmental review by other agencies (e.g., the California Department of Transportation) may be required to supplement this Draft EIR analysis prior to implementation of the US 101 on-ramp modification.</p>
Page 26; Footnote	<p>The project would establish and implement auto trip reduction measures, as part of a transportation system management (TSM) plan, which would result in a 25 percent reduction in vehicular trips to and from the project site.⁵</p> <p><u>⁵ The City’s prior Municipal Code Chapter 10.32 Transportation System Management Plan (TSM) and the City’s current Chapter 18.30.110 Transportation Demand Management (TDM), reference functionally equivalent TSM and TDM Plans.</u></p>
Page 29; Section 2.6.1 General Plan Designation and Zoning	<p>The site has a General Plan designation of Mixed Use High, which allows up to a 2.5 floor area ratio (FAR) with a maximum height of eight stories or 100 feet (whichever is greater) and up to 260 persons per acre (<u>applicable to residential projects</u>). The project proposes a FAR of 2.1 and height of eight stories.</p>
Page 29; Section 2.7 Project- Related Approvals, Agreements, and Permits	<p>This Draft EIR is intended to provide the City of East Palo Alto, other responsible agencies, and the general public with relevant environmental information needed in considering the proposed project. The City of East Palo Alto anticipates that this document would be utilized for the discretionary approvals required to implement the project, as well as any Development Agreement that might be needed for the project. <u>The project would require the following approvals:</u></p> <ul style="list-style-type: none"> • <u>Site Plan and Design Review</u> • <u>Lot Merger</u> • <u>Ministerial demolition, grading, building, and occupancy permits</u> • <u>Encroachment Permit (Caltrans)</u>
Page 31; Section 3.0 Timeframe of Analysis	<p>The project applicant anticipates that construction of the project will take approximately take 24 months and would consist of demolition of the existing buildings, paving, and landscaping, site preparation, construction of the office building and parking garage, and installation of landscaping. It is anticipated that construction would start in spring 2018 <u>2020</u> and the building would be completed in spring 2020 <u>2022</u>.</p>

Page 53;
Section 3.2.3.3
Violation of
Standards

Criteria Pollutants

Construction of the project would involve demolition of existing buildings and surface parking lots, site grading, trenching, paving, building construction, ~~and architectural coatings,~~ and relocation of the freeway ramp. The duration of project construction would be approximately 12 ~~to 13~~ months. Construction-related automobiles, trucks, and heavy equipment are a primary concern with regard to criteria pollutant emissions as a result of diesel particulate matter.

Table 3.2-3: Construction Criteria Pollutant Emissions

Scenario	ROG	NOx	PM ₁₀ Exhaust	PM _{2.5} Exhaust
Total construction emissions	1.49 <u>1.47</u> tons	2.39 <u>2.55</u> tons	0.05 <u>0.04</u> tons	0.04 tons
Average daily emissions ¹	11.5 <u>10.7</u> lbs./day	18.4 <u>18.6</u> lbs./day	0.4 <u>0.3</u> lbs./day	0.3 lbs./day
BAAQMD Thresholds	54 lbs./day	54 lbs./day	82 lbs./day	54 lbs./day
Threshold Exceeded?	No	No	No	No

¹Assumes ~~260~~ 274 workdays.

~~Construction would involve demolition of buildings and surface parking lots, site grading, trenching, paving, building construction, and architectural coating.~~ As shown in Table 3.2-3, the emissions of ROG, NOx, PM₁₀ exhaust, and PM_{2.5} exhaust associated with construction would not exceed the BAAQMD significance thresholds and, therefore, would not result in a significant impact from construction emissions. **(Less than Significant Impact)**

Page 55;
Section 3.2.3.3
Violation of
Standards

Toxic Air Contaminants

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. Construction exhaust emissions pose health risks for sensitive receptors such as surrounding residents. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to PM_{2.5}. The health risk assessment of project construction activities (refer to Appendix C) evaluated potential health effects of sensitive receptors at nearby residences and identified a maximally exposed individual (MEI) for construction emissions of DPM and PM_{2.5}. The MEI and receptors are shown in Figure 3.2-1.

Results of the assessment for project construction indicate the maximum incremental residential infant/child cancer risk at the MEI receptor would be ~~3.09~~ 3.09 in one million ~~and the residential adult incremental cancer risk would be 0.1 in~~

Page and Section	Text Revisions
Page 55; Section 3.2.3.3 Violation of Standards	<p>one million, below the significance threshold of 10 in one million. The maximum modeled annual PM_{2.5} concentration, was 0.024 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), which would not exceed the BAAQMD significance threshold of $0.3 \mu\text{g}/\text{m}^3$. The maximum modeled annual residential DPM concentration was 0.0159 $\mu\text{g}/\text{m}^3$, also lower than the BAAQMD significance criterion of a hazard index greater than 1.0. Because cancer risk, annual PM_{2.5} concentrations, and non-cancer hazards from construction activities would be below the significance thresholds, the impact would be less than significant. (Less than Significant Impact)</p>
	Operation
	<p><u>The project includes one 500-kilowatt diesel generator to provide emergency back-up power, which would be considered a new stationary pollutant source in the area. Annual average DPM and PM_{2.5} concentrations were modeled assuming that generator testing could occur at any time between the hours of 7:00 a.m. and 7:00 p.m. and the generator is operated for 50 hours per year. The MEI most impacted by the generator was the same MEI identified in the construction dispersion modeling. Increased cancer risk impacts from the emergency back-up diesel generator at the MEI would be 0.1 per million, which is less than 1.0 per million BAAQMD threshold. Annual PM_{2.5} and Hazard Index exposures would both be less than 0.01, which is below the $0.3 \mu\text{g}/\text{m}^3$ and 1.0 thresholds (respectively) specified by BAAQMD. Thus, the impact is less than significant.</u></p>
	<p><u>During operation, the project would generate an increase in vehicle traffic due to employees driving autos to and from the site. Operational emissions from the increased vehicular traffic on University Avenue and Donohoe Street were assessed. For operational emissions at the MEI for both roadways, the cancer risk would be 0.2 (less than 1.0 per million threshold) and the PM_{2.5} concentration would be less than $0.01 \mu\text{g}/\text{m}^3$ (which is less than the $0.3 \mu\text{g}/\text{m}^3$ threshold). BAAQMD has found that non-cancer hazards from all local roadways would be below 0.03. For these reasons, the impact would be less than significant. (Less than Significant Impact)</u></p>

Page 55;
Section 3.2.2.4
Cumulative
Pollutant
Increase

4.1.1.1 Cumulative Pollutant Increase

The following Table 3.2-4 presents a summary of the project health risk impacts during construction and operation for single sources and cumulative sources. As shown, health risk levels would be below BAAQMD-established thresholds and impacts would be less than significant during construction and operation of the project. A further discussion of the project’s construction and operational cumulative air quality impacts follows.

Table 3.2-4: Summary of Risk Impacts at MEI			
<u>Source</u>	<u>Cancer Risk (per million)</u>	<u>Annual PM_{2.5} (µg/m³)</u>	<u>Hazard Index</u>
<u>Project Construction</u>	<u>3.9 (infant)</u>	<u>0.04</u>	<u><0.01</u>
<u>Project Generator</u>	<u>0.1 (infant)</u>	<u><0.01</u>	<u><0.01</u>
<u>Project Traffic Increase</u>	<u>0.2</u>	<u><0.01</u>	<u><0.03</u>
<u>Combined Project Total</u>	<u>4.1 (infant)</u>	<u><0.06</u>	<u><0.05</u>
<u>BAAQMD Single-Source Threshold</u>	<u>>10.0</u>	<u>>0.3</u>	<u>>1.0</u>
<u>Significant?</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>Cumulative Sources</u>			
<u>Highway 101</u>	<u>49.1</u>	<u>0.33</u>	<u>0.04</u>
<u>University Avenue</u>	<u>1.3</u>	<u>0.04</u>	<u><0.03</u>
<u>Donohoe Street</u>	<u>2.0</u>	<u>0.07</u>	<u><0.03</u>
<u>Shell Gas Dispensing Facility</u>	<u>0.3</u>	<u>=</u>	<u><0.01</u>
<u>Chevron, Gas Dispensing Facility</u>	<u>2.7</u>	<u>=</u>	<u>0.01</u>
<u>Ravenswood School District, Gas Dispensing Facility</u>	<u>0.4</u>	<u>=</u>	<u><0.01</u>
<u>IKEA, Generator Source</u>	<u>4.5</u>	<u>0.01</u>	<u><0.01</u>
<u>Four Seasons Hotel Generator</u>	<u>0.5</u>	<u><0.01</u>	<u><0.01</u>
<u>Cumulative Total</u>	<u>64.9</u>	<u>0.46</u>	<u><0.20</u>
<u>BAAQMD Cumulative Threshold</u>	<u>>100</u>	<u>>0.8</u>	<u>>10.0</u>
<u>Significant?</u>	<u>No</u>	<u>No</u>	<u>No</u>

Page x;
Summary and
Page 76;
Section 3.4.2.3
Ground

MM NOI-1.1: Avoid using vibratory rollers, tampers, or dropping heavy equipment within 20 feet of a shared property line. If avoidance is infeasible, perform vibration monitoring within 20 feet of share property lines throughout construction work, to ensure that construction-related vibration levels do not

Page and Section	Text Revisions
Vibration and Noise	<u>exceed the 0.3 in/sec PPV threshold (adjusting work and equipment as necessary to meet this standard).</u>
Page 65; 3.3.2.4 Operational Impacts	<p style="text-align: center;">Electricity</p> <p>As described previously, the annual GWh electricity use in California was projected to increase by approximately one percent each year through 2027. The proposed project would increase annual electricity use by approximately 18,219,031 kWh, or 18 GWh (<u>which is less than 0.006 percent of the state’s total energy use</u>); therefore, the project would not result in a substantial increase in demand on electrical energy resources in relation to projected supply.</p>
Page 73; 3.4.1.3 Existing Conditions	As shown in Figure 3.4-1, ST-1 was made in front of 2145 Euclid Avenue (<u>the nearest sensitive residential receptor to the parking garage</u>), and ST-2 was made at the center of the project site. Short-term noise measurements are summarized in Table 3.4-4.
Page 95; Section 3.5.2.4 Intersection Levels of Service	As shown in the table above, measured against the significance criteria, the project would have a less than significant impact on all study intersections both with and without the loop road, <u>and in some cases improve traffic on University Avenue and Donohoe Street.</u>
Page xii Summary and Page 96; Section 3.5.2.5 Freeway Segments	MM TRAN-1.1: VTA’s Valley Transportation Plan 2040 identifies freeway express lane projects along US 101 between Cochrane Road (in Morgan Hill) and Whipple Avenue (in San Mateo County). The planned conversion of the existing HOV lane to an express lane and the construction of a second express lane in each direction would increase the capacity of the freeway and would fully mitigate the Project’s freeway impacts. Planned managed lane projects along this reach of US 101 are designed and approved. The project could make a fairshare contribution toward the cost of the identified managed lane project along US 101.
Page xii - xiii; Summary and Page 102; Section 3.5.2.9 Cumulative Intersection Level of Service	<p>MM C-TRAN-1.1: The project shall fund or construct the widening of Donohoe Street at University Avenue to accommodate dual westbound left-turn lanes, one through lane, a shared through-right lane and an exclusive right-turn lane. This improvement will require the acquisition of additional right-of-way on the south side of Donohoe Street between University Avenue and the US 101 Northbound off ramp <u>Capital Avenue.</u></p> <p><u>A reimbursement agreement between the applicant and the City to reimburse the applicant over time as the City collects fees or fair share contributions from benefitting projects shall be implemented. In addition, the inner left-turn lane on the northbound University Avenue approach to Donohoe Street shall be extended by an additional 250 feet. Extension of the northbound left-turn lane can be accommodated within the existing right-of-way, by cutting into the raised</u></p>

Page and Section	Text Revisions
	<p><u>median on University Avenue. This improvement would not require any additional right-of-way acquisition or reconfiguration of the US 101 overpass.</u></p>
	<p><u>Construction of the Donohoe Street improvements is dependent on acquisition of right-of-way from property on the south side of the street. The Applicant, prior to issuance of permits for the development, shall (1) acquire the needed right-of-way thru purchase of a portion or all of the property, or (2) advance funds including acquisition cost to the City for the cost of the land, and the City will take the lead in acquiring the property.</u></p>
	<p>MM C-TRAN-1.2: The project shall fund or construct the widening of the westbound approach on Donohoe Street at the US 101 Northbound off-ramp shall be to accommodate four through lanes to improve the vehicular throughput at this intersection. This improvement will require median modifications and narrowing the eastbound Donohoe Street approach to Cooley Avenue to include two through lanes and a full length left-turn lane. <u>A reimbursement agreement between the applicant and the City to reimburse the applicant over time as the City collects fees or fair share contributions from benefitting projects shall be implemented.</u></p>
	<p><u>Some intersections would improve under cumulative plus project conditions; however, with implementation of the above mitigation measures, the Euclid Avenue/Donohoe Street intersection would operate at acceptable LOS D during the PM peak hour. During the AM peak hour, the intersection would operate at unacceptable LOS F, but the average delay would be lower than under cumulative no project conditions.</u></p>
<p>Page 108; Section 3.6.1.2 Existing Conditions</p>	<p style="text-align: center;">Wastewater</p> <p>Wastewater <u>collection and conveyance</u> services are provided to the project site by the East Palo Alto Sanitary District (EPASD), including approximately 30 miles of sewer pipeline and 560 manholes.</p>
	<p style="text-align: center;">Storm Drainage</p> <p>The existing project site is partially developed with office buildings, as well as paved and <u>compacted</u> graveled parking areas and is approximately 46 percent impervious <u>roof and pavements, 40 percent compacted gravel, and 14 percent landscape.</u></p>
<p>Page 115; Section 4.0 Growth-</p>	<p>The proposed project is an in-fill office development to replace two existing commercial buildings, totaling 12,000 square feet and associated surface parking, and a vacant lot with an eight-story office building and five-story parking structure. The proposed project would also seek a rezoning to a PUD rezoning in</p>

Page and Section	Text Revisions
Inducing Impacts	order to accommodate the proposed buildings is consistent with the site's General Plan land use and zoning designations.
Page 121; Section 7.5.1.1 Comparison of Impacts	Under the No Project Alternative, the project site would remain as it is, and all of the environmental impacts anticipated to occur under the proposed project would be avoided. <u>The proposed roadway improvements that would improve the LOS on area roadways (freeway onramp, new traffic light, and Donohoe Street reconfiguration) would also not occur.</u>
Appendix A, Page 70; Section 4.11.2a)	The proposed project includes approximately 240,000 <u>231,883</u> square feet of office space and assuming 165 <u>230</u> square feet of office space per employee, the proposed project would bring approximately 1,400 <u>1,008</u> jobs to the City.
Appendix A, Page 59; Section 4.8.2 Checklist and Discussion of Impacts	Implementation of erosion control measures in MM HYD-1.1, MM HYD-1.2, and SMCWPPP's BMPs would ensure the project would not cause substantial erosion. For these reasons, the project would result in a significant impact to the drainage pattern of the area or increase surface runoff in a matter that would <u>not</u> result in a substantial increase of erosion or flooding. (Less than Significant Impact)

Appendix A: Draft EIR Comment Letters

DEPARTMENT OF TRANSPORTATION

DISTRICT 4
P.O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
FAX (510) 286-5559
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www.dot.ca.gov



*Making Conservation
a California Way of Life!*

February 7, 2019

Guido Persicone
City of East Palo Alto
1960 Tate Street
East Palo Alto, CA 94303

SCH# 2017052045
04-SM-2017-00232
GTS ID 6522
Post Mile: SM – 101- 1.045

University Plaza Phase II – Draft Environmental Impact Review (DEIR)

Dear Guido Persicone:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above-referenced project. In tandem with the Metropolitan Transportation Commission's (MTC) Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), Caltrans mission signals a modernization of our approach to evaluating and mitigating impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the DEIR.

Project Understanding

The project would demolish the existing buildings on site and construct an eight-story structure with approximately 233,840 square feet of office space and a five-story, 279,995 square foot parking structure with 772 parking spaces. Vehicular and bicycle access to the garage would be provided via a driveway off Donohoe Street and two right-turn-only driveways off University Avenue. Pedestrian access would be provided to the structures from sidewalks along University Ave and Donohoe St. The proposed project would also include two transportation system modifications: alterations to the Euclid Avenue/East Bayshore Road/Donohoe St. intersection, and the realignment of the northbound US 101 on-ramp at Donohoe St.

Design

Project Overview indicates that bicycle access to the parking garage will be via Donohoe St. Figure 2.5-5 does not indicate any bicycle lanes or facilities. Please specify if cyclists are intended to share the 12 ft. east bound lane with motor vehicles and how will cyclists exit the garage? Will they be expected to make left turns in to the 11 ft. westbound thru-lane on Donohoe St?

Project Overview also indicates that 30 trees would be removed, and four trees in State right-of-

way would be removed for the ramp re-alignment. The tree inventory does not appear to cover the State right-of-way. Are the four trees in State right-of-way included in the 30 trees mentioned as being removed? Are any of them Protected Trees?

Project designers should review Caltrans Highway Design Manual Sections 400 and 500 to verify that an acceptable ramp geometry is feasible. This includes establishing appropriate lane widths, turning geometries and lane drop tapers. It's not clear if the project proposes a signal phase at this location to allow direct access from the project garage driveway directly on to the US 101 on-ramp. The Traffic Study seems to forecast westbound Donohoe movements into the garage, but Figure 2.5-5 does not include that left turn movement.

Multimodal Impact Fees

The Lead Agency should identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified and incorporated in the Conditions of Approval. We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. Caltrans advises the Lead Agency to contribute fair share fees to the Class I bikeway and pedestrian bridge over US 101. Constructing this project over US 101 at University Ave – see Caltrans District 4 Bike Plan's Appendix A – would improve connectivity in the proposed project area and encourage active transportation. Please see Caltrans District 4 Bike Plan link.

http://www.dot.ca.gov/d4/bikeplan/docs/D4BikePlan_ProjectList.pdf

Vehicle Trip Reduction

Given the project's intensification of use and the massive amount of vehicle parking spaces, the project should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures will be critical to facilitate efficient transportation access to and from the project site and reduce transportation impacts associated with the project. The measures listed below will promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and convenient transit access;
- Secured bicycle storage facilities located conveniently near entrances to minimize deterrent of bicycle use due to weather conditions;
- Bicycle parking;
- Subsidized transit passes on an ongoing basis;
- Shuttle service for employees to the Fruitvale or Coliseum BART Station;
- Fix-it bicycle repair station(s);
- Charging stations and designated parking spaces for electric vehicles;

- Carpool and clean-fuel parking spaces conveniently located to encourage carpooling and clean-fuel vehicles;
- Lower parking ratios;
- Transportation and commute information kiosk;
- Showers, changing rooms and clothing lockers for bike commuters;
- Bicycle route mapping resources and bicycle parking incentives;
- Employee transportation coordinator;
- Emergency Ride Home program;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with annual Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on nearby State facilities. These smart growth approaches are consistent with the MTC's Regional Transportation Plan/SCS goals and

Lead Agency

As the Lead Agency, the City of East Palo Alto is responsible for all project mitigation, including any needed improvements to the STN. The project's financing, scheduling, implementation responsibilities and monitoring should be fully discussed for all proposed mitigation measures, prior to the submittal of an encroachment permit. Potential mitigation measures that include the requirements of other agencies—such as Caltrans—are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.

Encroachment Permit

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed and stamped traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Guido Persicone
City of East Palo Alto
February 7, 2019
Page 4

Should you have any questions regarding this letter, please contact Michael McHenry at (510) 286-5562 or Michael.mchenry@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Pat Maurice', with a stylized flourish at the end.

PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

February 7, 2019

Guido F. Persicone
Planning and Housing Manager
City of East Palo Alto
Community and Economic Development Department
Planning and Housing Division
1960 Tate Street
East Palo Alto, CA 94303

RE: The Draft EIR (DEIR) University Plaza Phase II Project

Dear Mr. Guido F. Persicone:

Bay Area Air Quality Management District (Air District) staff reviewed the Draft EIR (DEIR) for the University Plaza Phase II Project (Project), near the Highway 101/University Avenue interchange. The Project will merge four parcels to one, two existing buildings will be demolished, and an eight-story office building and a five-story parking structure with 773 parking spaces will be constructed. In addition, the project includes the funding or construction of improvements at the intersection of Donohoe Street and the US 101 Northbound offramp, with four through lanes.

Air District staff has the following recommendations regarding the DEIR's air quality and greenhouse gases impact analysis.

1. The air quality analysis does not appear to have included air pollution emission estimates for the roadway improvements at the US 101 Northbound Off-Ramp, Donohoe Street, and University Avenue. The transportation infrastructure modifications are included in the DEIR's project description, but no references or analysis are included in the DEIR or the Air Quality Technical Assessment. The City should disclose the project schedule for the roadway improvements so the potential air quality impacts from the entire project can be estimated to determine whether potentially significant localized impacts will occur if demolition, construction of the office building and parking structure and roadway improvements occur simultaneously.
2. Based on staff's analysis of the Project site and vicinity, this project area has elevated levels of toxic air contaminants (TACs) and fine particulate matter (PM_{2.5}) from existing nearby stationary and mobile sources. The Project's contribution to these existing air pollution levels was not identified through a health risk assessment (HRA) or dispersion modeling for the Project's operation; only construction activity was analyzed with an HRA. Staff recommends that an analysis of operational and cumulative PM_{2.5} and TAC impacts be prepared for the Project to identify the potential health risks associated with this project on nearby sensitive receptors, including the two roadway improvement scenarios.

ALAMEDA COUNTY

John J. Bauters
Pauline Russo Cutter
Scott Haggerty
Nate Miley

CONTRA COSTA COUNTY

John Gioia
David Hudson
(Chair)
Karen Mitchoff
Mark Ross

MARIN COUNTY

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(Vice Chair)

NAPA COUNTY

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Rafael Mandelman
Hillary Ronen
Tyrone Jue
(SF Mayor's Appointee)

SAN MATEO COUNTY

David Canepa
Carole Groom
Doug Kim

SANTA CLARA COUNTY

Margaret Abe-Koga
Cindy Chavez
Liz Kniss
Rod G. Sinks
(Secretary)

SOLANO COUNTY

James Sperring
Lori Wilson

SONOMA COUNTY

Teresa Barrett
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



-
3. The Initial Study (Appendix A) and the Focused DEIR do not adequately analyze the potential impacts of greenhouse gases for construction and operation, including the increased roadway capacity to and from US 101. The Project should demonstrate consistency with all the measures identified in the 2017 Scoping Plan needed to meet the State's strategy to achieve Statewide 2030 GHG reduction goals and being on track to meet 2050 climate stabilization goals.


Air District staff recommends the following additional feasible mitigation measures be required of the project to be more consistent with the 2017 Scoping Plan:

- Newly constructed non-residential buildings shall be designed to achieve a 10 percent or greater reduction in energy use versus a standard Title 24 code-compliant building through energy efficiency measures consistent with Tier 1 of the 2016 California Green Building Standards Code, Section A5.203.1.2.1. Alternatively, this measure can be met by installing on-site renewable energy systems that achieve equivalent reductions in building energy use.
- Newly constructed buildings shall be designed to include Cool Roofs in accordance with the requirements set forth in Tier 2 of the 2016 California Green Building Energy Codes (CALGreen), Sections A4.106.5 and A5.106.11.2.
- New outdoor parking lots for multi-family and non-residential buildings shall include trees and/or solar canopies designed to result in 50 percent shading of parking lot surface areas. If tree canopy is used, then it shall be sufficient to achieve this 50 percent shading requirement within 15 years of acquisition of the building permit. If a solar canopy system is used, then it must be installed and achieve 50 percent shading prior to issuance of an occupancy permit. Applicable Project Types: Multi-family residential and non-residential buildings with outdoor, on-site parking lots.
- Require the electrification of all loading docks to facilitate plug-in capability and require trucks to utilize grid power to deliver goods.
- Require the project to meet SB 743 derived vehicle miles traveled (VMT) reductions of 15% below the regional average VMT.
- Require 10% of parking spaces to include electric vehicle charging equipment and designated for electric vehicle parking only.

- Require the use of zero emission off road equipment for construction and operation, as well as renewable fuels (such as renewable diesel and biogas), if available.
- All construction activities shall implement waste reduction, disposal and recycling strategies in accordance with sections 4.408 and 5.408 of the 2016 California Green Building Standards (CALGreen). In addition, projects shall achieve or exceed the enhanced Tier 2 targets for reusing or recycling construction waste of 75 percent for residential and 80 percent for nonresidential buildings as described in Sections A4.408 and A5.408 of the CALGreen standards.

Thank you for the opportunity to submit comments. If you have any questions about the Air District's review of this DEIR, please contact Ada Márquez, Principal Environmental Planner, at (415) 749-8673 or amarquez@baaqmd.gov.

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director David Canepa
BAAQMD Director Carole Groom
BAAQMD Director Doug Kim



February 7, 2019

Mr. Guido F. Persicone
Planning and Housing Manager
City of East Palo Alto
Planning Division
1960 Tate Street
East Palo Alto, CA 94303

RE: Draft Environmental Impact Report, University Plaza Phase II project

Dear Mr. Persicone,

Thank for you for the opportunity to provide comments on the City of East Palo Alto's draft Environmental Impact Report (EIR) for the University Plaza Phase II project (Project). The proposed Project would redevelop 2.58 acres at 2111 University Avenue, on the northwest corner of University Avenue and Donohoe Street. The Project proposes an eight-story structure with approximately 233,840 square feet of office space and a five-story parking structure with approximately 772 parking spaces. Reconfiguration of the US 101 northbound on-ramp at Euclid Avenue/East Bayshore Road/Donohoe Street is also proposed as part of the Project.

The City of Menlo Park's comments on the draft EIR, many of which were identified in the comment letter on the Notice of Preparation dated June 19, 2017, are described in detail below:

1. The proposed Project will generate a significant amount of vehicular, transit, bicycle and pedestrian traffic. The traffic study assumed a 25% trip reduction based on a city-required transportation demand management (TDM) plan. The study included some generic details about the TDM plan, but did not include a description of implementation and/or monitoring processes. To take advantage of the 25% trip reduction in the draft EIR, the analysis should identify the supporting local ordinance or adopted documentation setting forth the City of East Palo Alto's TDM requirements, a brief description of what will be included in the plan, a tentative schedule for future tenants to develop, implement and monitor the plan after occupancy, and how the TDM plan will be enforced; otherwise no TDM trip reduction credit should be taken and there should be a more conservative analysis.
2. The traffic analysis should be prepared consistent with the City of Menlo Park's Transportation Impact Analysis Guidelines for analyses of Menlo Park facilities (see

<http://menlopark.org/DocumentCenter/Home/View/302>). The analysis used an outdated methodology and should use the 2010 Highway Capacity Manual (HCM) methodology.

In addition, the Settlement Agreement and Release of Claims (Settlement Agreement) between the City of Menlo Park and the City of East Palo Alto requires the cities to “work together to ensure that a Development Project’s potentially significant traffic impacts on the other jurisdiction are analyzed and mitigated.” Thus, the City of Menlo Park’s transportation comments, detailed below, regarding the proposed Project should be addressed in the draft EIR to comply with the Settlement Agreement:

Congestion on local roadways should be analyzed, specifically including the following three intersections:

1. University Avenue/Adams Drive
2. Willow Road/US 101 NB on-off ramp (under construction)
3. Willow Road/US 101 SB on-off ramp (under construction)

The intersection of University Avenue/Adams Drive serves as one of the main accesses to University Avenue for existing and future commercial buildings in the area and has been recommended to be signalized in the City of Menlo Park’s ongoing planning effort for the Transportation Master Plan.

With the draft EIR confirming that University Avenue/US 101 ramp intersections are expected to operate at unacceptable level of services (e.g., LOS E/F), it is reasonable to expect a small percentage of Project trips to divert to the Willow Road/US 101 interchange to access US 101, and that should be reflected accordingly.

3. The draft EIR provided a qualitative transit impact evaluation, but should include transit boarding and alighting analyses to properly evaluate the potential transit impact.
4. Study intersection numbers 1, 2, and 3 are Caltrans intersections but adhere to City of Menlo Park Transportation Impact Guidelines. The following comments apply to these intersections:
 - The traffic analysis did not reflect the existing congestion. As summarized in the City of Menlo Park’s General Plan (ConnectMenlo) EIR adopted in 2016, isolated intersection analysis does not account for the queue spillback between intersections on the approaches to the Dumbarton Bridge, including those on Bayfront Expressway, Willow Road, and University Avenue. Furthermore, based on the field observations stated on pages 21 and 22 of the traffic impact analysis, the LOS results derived from the transportation Vistro software are likely underestimating the existing congestion levels. These LOS calculations should be updated in order to

present accurate existing and cumulative scenarios to assess project impacts.

- Existing and cumulative Project impacts, for intersections operating at an unacceptable LOS (e.g., LOS E/F) under the no project scenarios, should be evaluated by comparing the intersection average critical delays instead of average delays. Tables ES-1 and ES-2 of the traffic impact analysis report stated “Incr. In Crit. Delay” in the header but appeared to be comparing average delays.
5. The Cumulative Project List in the draft EIR (Table 3.0-2) should include City of Menlo Park pending projects such as the Facebook Willows Village. While the application for the Willow Village was submitted on July 6, 2017 after the Notice of Preparation was released on May 18, 2017, the short amount of time intervening between those two dates and the long amount of time (approximately 18 months) before the draft EIR was released and the high profile nature of the Willow Village suggest that it is reasonable to and should be included in the Cumulative Project List. Please refer the attached for a complete list of applicable projects.
 6. The draft EIR indicates that one of the project objectives is attracting high-tech companies and employees. If the Project intends to house tech companies with higher employee densities, the employment projections and associated analysis (housing, VMT, traffic, etc.) should be revised and updated to account for this land use type.
 7. High-tech companies like Facebook or organizations like Stanford are achieving very high success rates at reducing drive-alone rates. Therefore, the 55 TSM Alternative should not be dismissed as infeasible. If it is adopted as the environmentally superior alternative, monitoring and enforcement provisions should be included to ensure the Project meets the transportation demand management performance goals.
 8. The proposed Project will generate office workers and support staff and could exacerbate demand for housing and impact housing affordability and availability in East Palo Alto, as well as the region. The draft EIR fails to analyze the population growth and housing impacts of this increased employment. Despite the City of Menlo Park’s request (and that of Invision Transform Build EPA), the draft EIR does not include the preparation of a housing needs assessment (HNA) to identify the housing demand associated with the proposed Project. The Settlement Agreement (see Sections 2.2 and 2.6) requires the preparation of an HNA; therefore, to comply with the Settlement Agreement, an HNA must be prepared for the proposed Project. The scope of the HNA is, to the extent possible, to include an analysis of the multiplier effect for indirect and induced employment by the proposed Project and its relationship to the regional housing market and displacement.

A lead agency is required to recirculate an EIR when significant new information is added. See 14 Cal Code Regs (CEQA Guidelines) Section 15088.5. The City of Menlo

Park looks forward reviewing a recirculated draft EIR that addresses the comments identified above and the opportunity to meaningfully comment on that new information. If you have any questions, please feel free to contact Justin Murphy, Public Works Director at 650-330-6725 or jicmurphy@menlopark.org.

Sincerely,



Starla Jerome-Robinson
Interim City Manager

List of Development Projects Based on Applications Received before or near December 2018

PROJECT ADDRESS	TYPE OF USE	SIZE	UNITS OF MEASURE	APPROVED OR PENDING	OCCUPIED AS OF MARCH 2017 TRAFFIC COUNTS	STATUS AS OF DECEMBER 2018	TRAFFIC STUDY PREPARED	TRAFFIC CONSULTANT	PLANNER	PROJECT LOCATION
New Magnet High School 150 Jefferson Dr	School School Light Industrial	40,000 400 -43,986	sf students sf	Approved Existing	No No No	Under Construction Under Construction Demolished	Yes	Hexagon	Sequoia Union High School District	East of U.S. 101
Greenheart 1300 El Camino Real	Residential Office Retail/Personal Service Dance Studio Fast Food Restaurant Hardware Storage	183 203,000 18,600 -3,800 -1,200 -5,000	du sf sf sf sf sf	Approved Approved Approved Existing Existing Existing	No No No No No No	Under Construction Under Construction Under Construction Demolished Demolished Demolished	Yes	W-Trans	Thomas Rogers	West Menlo/Downtown/El Camino Real
840 Menlo Ave	Residential Office	3 6,610	du sf	Approved Approved by PC appealed to CC	No No	Proposed Construction Proposed Construction	No	n/a	Katie Meador	West Menlo/Downtown/El Camino Real
Stanford 2111-2121 Sand Hill Road	Office Office Residence	39,010 48,024 1	sf sf du	Pending Existing Existing	No Yes Yes	Proposed Construction Existing (Would Remain) Existing (Would Remain)	Yes	Hexagon	Tom Smith	Sharon Heights/Sand Hill
1430 O'Brien Dr.	R&D Fitness Café R&D	66,583 10,223 7,652 65,952	sf sf sf sf	Approved Approved Approved Existing	No No No No	Under Construction Under Construction Under Construction Existing (Partially to Remain, Partially Demolished)	No (TDM Plan)	n/a	Tom Smith	East of U.S. 101
1080 O'Brien Dr	R&D/Office Office	29,040 -20,454	sf sf	Approved Existing	No Yes	Under Construction Proposed Demolition	No (TDM Plan)	n/a	Tom Smith	East of U.S. 101
40 Middlefield	Office	3,584	sf	Pending	No	Proposed Construction	No (TDM Plan)	n/a	Tom Smith	The Willows
Guild Theatre 949 El Camino Real	Live Entertainment Venue Cinema	10854 -4172	sf sf	Approved Existing	No Yes	Proposed Construction Proposed Renovation	Parking Evaluation prepared by CHS consulting Note 10,854 sf is total, net increase is 6,682 sf TDM Plan required as draft condition of approval		Mark Muenzer/Corinna Sandmeier	West Menlo/Downtown/El Camino Real
1540 El Camino Real	Residential Office Retail	27 40,759 -23,536	du sf sf	Approved Approved Existing	No No Yes	Proposed Construction Proposed Construction Proposed Demolition	No (TDM)	n/a	Katie Meador	West Menlo/Downtown/El Camino Real
115 El Camino Real	Residential Retail Hotel	4 1658 Info requested in incomplete Itr	du sf rooms	Pending Pending Existing	No No Yes	Proposed Construction Proposed Construction Proposed Demolition	No (TDM Plan Required)		Corinna Sandmeier	West Menlo/Downtown/El Camino Real

List of Development Projects Based on Applications Received before or near December 2018

PROJECT ADDRESS	TYPE OF USE	SIZE	UNITS OF MEASURE	APPROVED OR PENDING	OCCUPIED AS OF MARCH 2017 TRAFFIC COUNTS	STATUS AS OF DECEMBER 2018	TRAFFIC STUDY PREPARED	TRAFFIC CONSULTANT	PLANNER	PROJECT LOCATION
506-556 Santa Cruz Ave.	Residential Retail/Café Office Residential Commercial	7 4,617 17,860 -7 -12,359	du sf sf du sf	Approved Approved Approved Existing Existing	No No No Yes Yes	Under Construction Under Construction Under Construction Proposed Demolition Proposed Demolition	Shared Parking		Corinna Sandmeier	West Menlo/Downtown/EI Camino Real
1125 Merrill St.	Residential Office Commercial Residential	2 4,366 -1,887 -1	du sf sf sf	Approved Approved Existing Existing	No No Yes Yes	Under Construction Under Construction Proposed Demolition Proposed Demolition	Shared Parking		Corinna Sandmeier	West Menlo/Downtown/EI Camino Real
409 Glenwood Ave.	Residential Residential Residential (Historic Home)	7 -2 1	du du du	Approved Existing Existing	No Yes Yes	Proposed Construction Proposed Demo Existing (Would Remain)	Yes (Not yet initiated)	LSA	Katie Meador	West Menlo
1350 Adams Court (1315 O'Brien Drive)	R&D	260,400	sf	Pending	No	Proposed Construction	In Progress	Hexagon	Kyle Perata	East of 101
1350 Willow Road (Facebook Willow Village)	Residential Office Retail (Non Office Commercial) Hotel Cultural/Visitor Center Office/Lab Warehouse Warehouse/Office	1,500 1,750,000 126,500 130,000 40,000 -390,663 -446,483 -137,819	du sf sf sf sf sf sf sf	Pending Pending Pending Pending Pending Existing Existing Existing	No No No No No Yes Yes Yes	Proposed Construction Proposed Construction Proposed Construction Proposed Construction Proposed Construction Proposed Demolition Proposed Demolition Proposed Demolition	In Progress	Hexagon/W-Trans	Kyle Perata	East of 101
111 Independence Drive	Residential Office	92 -15,000	du sf	Pending Existing	No Yes	Proposed Construction Proposed Demolition	Yes (Not yet initiated)	TBD	Kyle Perata	East of 101
1105 O'Brien Drive	R&D Office/Warehouse	118,587 -38,688	sf sf	Pending Existing	No Yes	Proposed Construction Proposed Demolition	Yes (Not yet initiated)	TBD	Tom Smith	East of 101
151 Commonwealth Drive	Office	249,000	sf	Pending	No	Proposed Construction	In Progress	Kittleson	Tom Smith	East of 101
555 Willow Road (Boarding House)	Boarding House Office Restaurant	16 -1,400 1,267	rooms sf sf	Pending Existing Existing	No No Yes	Proposed Construction Proposed Demolition Existing (Would Remain)	No	n/a	Katie Meador	The Willows
1704 El Camino Real Hampton Inn	Hotel Hotel Hotel Hotel	70 40,060 -10,776 -28	rooms sf sf rooms	Pending Pending Existing Existing	No No Yes Yes	Proposed Construction Hotel sf for reference only Proposed Demolition Proposed Demolition	No	n/a	Corinna Sandmeier	West Menlo/Downtown/EI Camino Real
706-716 Santa Cruz Avenue	Residential Office Retail Retail/Restaurant/Bank	4 23,454 12,075 -12,758	du sf sf sf	Pending Pending Pending Existing	No No No Yes	Proposed Construction Proposed Construction Proposed Construction Proposed Demolition	No (TDM)	n/a	Katie Meador	West Menlo/Downtown/EI Camino Real
1345 Willow Road	Residential Residential	140 -82	du du	Pending Existing	No Yes	Proposed Construction Proposed Demolition	No	n/a	Matt Pruter	East of 101

List of Development Projects Based on Applications Received before or near December 2018

PROJECT ADDRESS	TYPE OF USE	SIZE	UNITS OF MEASURE	APPROVED OR PENDING	OCCUPIED AS OF MARCH 2017 TRAFFIC COUNTS	STATUS AS OF DECEMBER 2018	TRAFFIC STUDY PREPARED	TRAFFIC CONSULTANT	PLANNER	PROJECT LOCATION
201 El Camino Real	Residential Medical Office Retail Residential Commercial	14 5,000 2,513 -4 -5,949	du sf sf du sf	Pending Pending Pending Existing Existing	No No No Yes Yes	Proposed Construction Proposed Construction Proposed Construction Proposed Demolition Proposed Demolition	No	n/a	Matt Pruter	West Menlo/Downtown/El Camino Real
141 Jefferson Drive	Residential Industrial Industrial Industrial	483 -67,161 -30,000 -11,250	du sf sf sf	Pending Existing Existing Existing	No Yes Yes Yes	Proposed Construction Proposed Demolition Proposed Demolition Proposed Demolition	Yes (Not yet initiated)	TBD	Tom Smith	East of 101
250 Middlefield Road	Office Office	4,404 20,496	sf sf	Pending Existing	No Yes	Proposed Construction Existing (Would Remain)	No	n/a	Fahteen Khan	The Willows
1162 El Camino Real	Residential Commercial/Office/Retail	9 Unknown	du sf	Pending Existing	No	Proposed Construction Proposed Demolition	No	n/a	Corinna Sandmeier	West Menlo/Downtown/El Camino Real

Notes:

Table includes all projects in City of Menlo Park that have filed a complete development application for 5 or more NET NEW residential units or 5,000 sf or more of NET NEW commercial. Table includes pending and approved projects that were not occupied when traffic counts were performed. For residential projects, occupancy is based on date of final building inspection. For commercial projects, occupancy is based on date of final building inspection of applicable tenant improvements. Some projects involve the demolition of existing structures. Demolished buildings are only listed for projects that receive credit for traffic purposes. Project location corresponds to the four categories in the CSA as follows from west to east: Sharon Heights/Sand Hill; West Menlo/Downtown/El Camino; West of US 101; and East of US 101. n/a = not applicable

UNITED NATIONS ASSOCIATION OF OAKLAND D.A.R.P. PROGRAM

City of East Palo Alto
Planning Dept. Permit Center
Ms. Ami Upadhyay
1960 Tate Street
East Palo Alto, Cal. 94303

RE: PROPOSED PROJECT
PUBLIC NOTICE AND DISPLAY

APPLICANT: SOBRATO ORGANIZATION
ADDRESS: 2111 UNIVERSITY AVE.
APN: 063-292-170

Dear Ms. Upadhyay and Municipal Staff;

Please note upon receipt of this written and USPS delivered written communication the surrounding community residents has taken receipt of the project display board announcing the PUBLIC NOTIFICATION of the above named proposed construction project on behalf of the SOBRATO ORGANIZATIONS interest.

Also, please note, in the interest of the same surrounding residents concerns, this agency named UN [Assoc. of] Oakland, is providing formal notification the address known and numbered as 2111 thru 2117 University Avenue has been named as one of several surviving historic landmarks so designated during the former active years of the East Palo Alto Historical and Agricultural Society [1992 thru 2001] and recently entrusted to the Ravenswood Community History Survey.

Considering the lengthy association, I personally, have endured with your colleague municipal officials in areas of historic preservation of items belonging to this Older Ravenswood Community, it is of little surprise that claims of current ownership are taking place among commercial developers.

However, it remains quite unfortunate the SOBRATO ORGANIZATION, AMAZON and DEVCON CONSTRUCTION has already severed, at least two, significant historic arteries and the historic CHARLES DREW MEDICAL FACILITY BLDG. is slated for redevelopment as reflected within the PUBLIC NOTICE.

The story of Dr. Charles Drew and his Pharmacy during and after the post WWII years will literally leave anyone speechless and considering the historic association to the legendary WWII Tuskegee Airman, it all took place in a place called Ravenswood, Ca. and long before any East Palo Alto Surfaced. FYI- The name East Palo Alto reflected some political maneuver by the son of Lester Cooley and this part of history has yet to be disclosed to the public.

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(mail inquiries to) UN OAKLAND D.A.R.P. PROGRAM
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650 461 0276 UNoakland@aol.com

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Also please note that formal communications reflecting our community member's interest in maintaining these historic structure has been directed to the surviving Charles Drew family members whom are associated with the Charles Drew School of Science and Medicine in So. California as well as to several interested business entities throughout the Bay Area.

There are dozens of sole-proprietary business owner/operators whom are desperate for office and commercial business development space [in East Palo Alto] and one being myself. One other prominent business operator took it upon his professional concerns to draft a formal Chamber of Commerce business plan for the City of East Palo Alto, today, that same business operator tenancy was terminated without just cause within the 2111 University Ave facility....

In general, my past experiences suggest noticeable oversights in the preservation of valued historic structures has reflected in the visible deprivation of needed "life sensitive" resources such as knowing ones history,and without such, one's failure is almost imminent.

The address of 2111 University Ave reflects the location of only one of several associated structures during that mid 1940's era and your displayed configuration reflects more than just one parcel address when there were several structures associated with the, now vacant, multiple parcels.

The concerned public has a right in knowing how the property was purchased by the City of East Palo Alto and subsequently sold to the SOBRATO ORGANIZATION with DEVCON the assigned contractor.....

To further clarify our concerns of inadequate previous EIR studies and CEQA compliances performed within several significant redevelopment projects preceding both University Square, University Circle, Bell Street Park Etc., I have also included for your digest a duplicate of a recent written correspondence directed to the office of North Santa Clara County Supervisor, Joe Simitian and in response to Stanford University's overwhelming presence within this historic community.

Since my business startup within Ravenswood Industrial Park, I am certain there exist some noticeable and invisible historic voids that cannot be explained without further investigation and mutually arranged, off-line, dialog among community, school district(s), municipal, County and possibly State administrators.

The planning of the 2nd Decade Regional meeting of Mid-peninsula Historians was intended as a formally managed [UN]ESCO [Educational, Scientific, Cultural Organization] recognized efforts to improve cultural development however, the City of East Palo Alto must first recognize it has not served this community's best interest in the preservation of historic possessions.

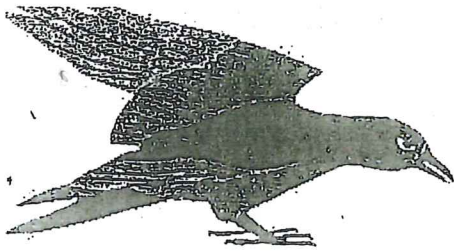
I'm certain you can appreciate my continued efforts at sharing these concerns and you can anticipate our presence at every stage of the proposed development of the Charles Drew historic structures.

Sincerely

A handwritten signature in black ink, appearing to read "Leland J. Francois", with a long horizontal flourish extending to the right.

Leland J. Francois
Ravenswood Industrial Park
UN Oakland D.A.R.P. Program.
P.O. Box 51524
Ravenswood Industrial Park, Ca. 94303

U.S. CERTIFIED 7016 xxxk 4024



RAVENSWOOD CALIFORNIA

COMMUNITY HISTORY SURVEY

P.O. BOX 51524 [1991 BAY ROAD temporary]

RAVENSWOOD INDUSTRIAL PARK

CALIFORNIA 94303-1524

(650) 461 0276 communityhistorysurvey@yahoo.com

FREE AT LAST GARDENING CLUB

IN PARTNERSHIP WITH

RAVENSWOOD GARDENKITS PRODUCTS

PRESENTS

BLACK AND BROKEN HISTORY MONTH

2018

CELEBRATION FUND RAISER



IN RECOGNITION OF OUR HISTORIC CHARLES DREW MEDICAL BUILDING

2111 2117 UNIVERSITY AVE.

[NEW AND UNIQUE DRIVE-THRU INTERVIEWS]

SPONSORS: HAPPY DAY SECURITY AND PATROL SERVICE INTL. Bldg. 2117B
MIDTOWN MAINTENANCE OF RAVENSWOOD
FREE AT LAST GARDENING CLUB
COMMUNITY 9-1-1 MONITORING STATION
RAVENSWOOD COMMUNITY HISTORY SURVEY
ERECT-A-GARDEN PLANTING SYSTEM
THE OTHER APPLE STORE, CO-OP

**BRING US YOUR OLD CHARLES DREW MEDICAL STORY'S
AND OLD RAVENSWOOD H.S. STORY'S...DOCUMENTS,
PHOTOGRAPHS, NEWSPAPER ARTICLES**

**[NEW AND UNIQUE
UNIVERSITY AVE...WEST
DRIVE-THRU INTERVIEWS]**

(bldg. 2111A)



EXIT AT SURVEY TABLE (bldg. 2111A)



CIRCLE THIS WAY

(bldg. 2111B)



TURN LEFT AND

TURN RIGHT HERE (bldg. 2111B)

**OUR SURVEY TABLE WILL BE SET-UP DAILY
PLEASE TELEPHONE FOR EXACT TIMES
650 461 0276**

**FRIENDS OF OUR COMMUNITIES HISTORIC
DR. CHARLES DREW MEDICAL BUILDINGS
BLDG 2112 thru BLDG 2117 UNIVERSITY AVE.**

On behalf of our Black History Month 2018 celebrations, please join us in welcoming the recent business operator to join our list of tenants in the Charles Drew facilities.

HAPPY DAY SECURITY AND PATROL SERVICES INTL. is operated thru. Kings Way Capital Partners and owner/operator, Shola Sobayo.

In months ahead, at least two of the listed named sponsors will join HAPPY DAY SECURITY AND PATROL SERVICES INTL. with combined and collective consolidation of MIDTOWN MAINTENANCE OF RAVENSWOOD AND, AT LEAST ONE OTHER NAMED STARTUP, OUR FREE-AT-LAST GARDENING CLUB OR THE OTHER APPLE STORE CO-OP MARKET PURSUIT.

MIDTOWN MAINTENANCE OF RAVENSWOOD is very concerned regarding the outside appearance of our historic Charles Drew Medical Facilities and would like to make some contribution during this Black History Month to improve the outside landscape.

With that, communications has been directed to the family of our Charles Drew facility requesting permission to help correct some of the defects.

Members of our African American community residents should be encouraged in knowing every attempt is moving forward to re-establish the community services provided through our Charles Drew facilities in addition to preserving the historic quality of these structures.

Please support our BHM 2018 fundraiser....

UNITED NATIONS ASSOCIATION OF OAKLAND D.A.R.P. PROGRAM

February 7, 2018

Drew Health Foundation
Director Ms. Myrtle Walker
1191 Runnymead Street
Old Ravenswood Community
E. Palo Alto, Calif. 94303

Dear Drew Health Foundation Administrator;

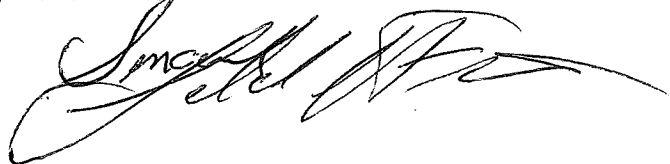
On behalf of my efforts at researching and documenting the lives of Bay Area African Americans who made some significant contribution to the formation of the 1945 Bay Area United Nations ceremonies, our surveyors has launched this Black History Month 2018 acknowledgment of the landmarks and named businesses associated with the lives of Dr. Charles Drew.

We are making some attempt at bringing together the Charles Drew historic events in both Southern California with our Northern California events since there exist a historic void between his final years in 1950 to the present.

Our Charles Drew Health Foundation continues to exist and serve hundreds of East Palo Alto's residents since the mid 1960's and the 2111 thru 2117 facilities was registered with both State of California and Federal Historic Registers when I was active with the former East Palo Alto Historical and Agricultural Society during the years 1990 thru 2001.

As these efforts continues in recognition of this Ravenswood communities 150 year old legacy, we most certainly would like to continue with the historic acknowledgment and preservation of these structures and taking into consideration these pair of structures are the only remaining structures associated with our African American residents.

What was historically qualified from both the 1958 former Ravenswood High School Campus and Whisky Gulch Business District remains a only a vision of the past for many.....I surely hope some mutual efforts within this community, school district and municipality can be pursued in the interest of maintaining this landmark.



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(mail inquiries to) **UN OAKLAND D.A.R.P. PROGRAM**
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UNITED NATIONS ASSOCIATION OF OAKLAND D.A.R.P. PROGRAM

December 4, 2018

Santa Clara County 5th Dist.
Supervisor Joe Simitian
701 Ocean Street Suite 318
Santa Cruz, Ca. 95060

RE: MID-PENINSULA HISTORICAL RESOURCE
INVENTORIES POSSIBLY IMPACTED FROM
[P.A.S.T] STANFORD DEVELOPMENT
AGREEMENT(S), MOU'S, EIR'S , i.e. C.E.Q.A.,

Dear Supervisor Simitian;

Thanks to your office for extending such invitation for the public's attendance to Thursday's, November 29th Community Feedback discussion held within the Palo Alto Council Chamber and your receipt of this written communications should provide for additional and continued comments to the following matter(s) of interest.

I am certain it is not an everyday common for your office to take receipt of information directly to the benefit of the United Nations interest however, please note our presence, over the past twenty-four years within the jurisdictional entity known as East Palo Alto, California was in the interest of confirming and collecting historical data.

Our UN Association of Oakland has made significant contribution to Oakland California since Oakland's participation in the original 1945 ceremonial events and the [UN] Oakland D.A.R.P. [Documentation, Archiving Records and Preservation] Program specifically covers the periods extending from 1968 thru the early 1990's era.

This was the most important post civil-rights humanitarian outreach from the UN in that housing issues had already overwhelmed the African American community and one of the UN's mission was to form the UN HABITAT PROGRAM [UNCHS] to help monitor and oversee this growing concern among landless people.

The country of Nairobi, Kenya Africa became the headquarters in the early 1970's and it was then mutual efforts among international partner agencies to help pursue the original International Sister Community Friendship Exchange and, based on Oakland's already primed association to the UN, the program was partly administered through Oakland and what was then referenced to as the "Sister Community in American" named Nairobi, California that, for the most part, was head-quartered within the large shopping center named "UHURU" and located at the intersection of Bay Road and University Ave. however, there were many supportive structures constructed during the approx. 18 year life-span of Nairobi, Ca.

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It was then the local African Americans were supported in all areas of self-serving social development challenges including academics, commerce, construction etc. It was the construction support received from UN partners that help to make way of adequate housing needs in what was then name "Unincorporated" East Palo Alto however Ravenswood California historically.

In the interest of the community, the D.A.R.P. Program has involved itself in pursuit of historical fact-finding and much of our early survey work was shared with the Palo Alto Historical Resource Board however, some initial attempts at organizing a series of planned regional meeting of mid-peninsula historians resulted in an actual, all-day, attendance and conference of local historians on March 7th, 2001.

It is our assumption from those dozen original representatives of municipal planners, historians and developers there was an overwhelming interest however, just six months later...on Sept. 9th, 2001 all things changed within this mid-peninsula and especially in a place named East Palo Alto.

During such recovery and aftermath since Sept. 11th, 2001, our D.A.R.P. Program has focused on specific events that needed some confirming research and we have discovered some unexplainable historic voids within this 150 year old Ravenswood Industrial Park, Community and School District.

Many of these discovered voids has been shared with the public with specific intent to further educate those on the origin of the named East Palo Alto and prior to the municipal incorporation in 1983.

During the November 29th Community gathering, reference was made to EIR's as associated with CEQA and many of East Palo Alto residents feel completely overwhelmed by the intensity of the redevelopment projects installed by the monster corporation and the total absence of significant historical resources.

Our D.A.R.P. Program is not an official agency of the UN however, our historical research into the actual UN's Bay Area events suggest that very little attention was extended to sensitive and cultural resources and quite possibly todays national homelessness crisis actually may have been seeded in East Palo Alto as the result of the oversight of such sensitive resources...prior to their destruction and our UN Oakland D.A.R.P. Program can only attest there has been some significant losses as pointed out in another recently dated Oct. 31st, communications in the publics interest.

The UN can be expected to produce an official disposition upon receipt of current recorded events and No. Santa Clara County may have had a significant impact on East Palo Alto's history through little known father-to-son business and political ties that has spanned more than 100 years and any planning of succeeding regional historical conference should move forward such that the public's concerns can better be addressed as we have made the aforementioned disclosure openly and without reservation.

Sincerely

Leland J. Francois
UN Oakland D.A.R.P. Prgm. Fndr.
Ravenswood Industrial Park, Ca



HEMIGROWN DESIGN FOR COMMUNITY
SELF-DETERMINATION

ETB.EPA@GMAIL.COM

COORDINATING
MEMBERS

Youth United for
Community Action

Faith in Action
Bay Area

Community Legal
Services of
East Palo Alto

Urban Habitat

ADVISORY MEMBERS

Community of East
Palo Alto

LEAD CONTACTS

Tameeka Bennett, E.D.

February 7, 2019

Guido F. Persicone
Planning and Housing Manager
City of East Palo Alto, Planning Division
1960 Tate Street
East Palo Alto, CA 94303
gpersicone@cityofepa.org

**Re: Envision Transform Build-East Palo Alto Comment Letter for University
Plaza Phase II Project Draft Environmental Impact Report**

Dear Mr. Persicone,

On behalf of the Envision, Transform, Build – East Palo Alto (ETB-EPA) Coalition, we thank you for the opportunity to comment on the draft Environmental Impact Report (“DEIR”) for the University Plaza Phase II Project (“the Project”). We previously submitted comments on the Notice of Preparation for this project and feel strongly that much of the information and analysis we requested in that letter is not contained in the DEIR.

As you are aware, ETB-EPA is a coalition of nonprofit, community and faith-based organizations, residents, architects, planners and youth, engaged in land use, planning, and development issues in southern San Mateo County for over eleven years. We were active in the development of East Palo Alto’s Ravenswood/4 Corners Transit Oriented Specific Plan, as well as the recently updated General Plan. We also commented extensively and negotiated on both of the Facebook development projects securing substantial community benefits for low-income residents of EPA and Belle Haven

Accordingly, we use as a backdrop for this letter, the lack of responsiveness to some of the issues discussed in our initial NOP letter and submit the following comments to the DEIR.

Induced Demand for Housing Ignored

In ETB-EPA's five-page NOP comment letter for the Project, we requested that the EIR evaluate and study the Project's impact on the local housing market, and specifically the consequences for renters and low-income residents in EPA. The evaluation is not included in the DEIR. Instead, the DEIR states in Section 4.0: "The proposed project would help the City move towards a stable jobs to housing ratio in accordance with its General Plan and within the City's urban boundary; therefore, the proposed project would not have a significant growth inducing impact." DEIR at p. 115.

The aforementioned Section 4.0—Growth Inducing Impacts—treats this issue with less than 300 words and relies solely on an ill-explained jobs to housing ratio argument. It ignores or perhaps purposely fails to point out that by approving the Project, EPA's jobs-housing balance will improve, but at the cost of new Project employees relocating to EPA and thereby increasing pressure on the existing housing stock and causing a concomitant increase in housing prices. The DEIR beggars belief by stating that the Project, which includes over 500,000 square feet of new development and brings hundreds of new workers to our small town, will "not have a significant growth inducing impact." The DEIR's failure to properly evaluate the induced demand for housing created by the Project is legally deficient.

Project's Potential to Contribute to Indirect Displacement Not Discussed

The DEIR's failure to evaluate the Project's induced demand for housing also results in inadequate discussion of potential displacement effects. The DEIR states "There are no existing housing units on the project site. No housing or people would be displaced as a result of the proposed project." DEIR Appendix A: Initial Study, Dec. 2018 at p. 70. While it is true that no housing units will be demolished causing direct displacement, the DEIR contains no analysis of the impact of indirect displacement, i.e., displacement of mostly lower-income families that occurs when rents increase due to increased land values and an influx of higher-wage earners. The DEIR thus ignores the Project's potential to contribute to the displacement of existing low-income residents residing in East Palo Alto]

The DEIR Underestimates Job Growth Generated by the Project and Uses Inconsistent Factors

The DEIR underestimates the likely job growth that is associated with the development of the Project. It appears that at least two different factors are used to calculate the number of assumed jobs generated. The DEIR cites that "assuming 165 square feet of office space per employee, the proposed project would bring approximately 1,400 jobs to the City." DEIR Appendix A: Initial Study, Dec. 2018 at p. 70. However, within the Hexagon Traffic Analysis the following statement is made: "The project employment was estimated assuming 4 employees per 1,000 square feet. Multiplying the estimated number of employees (928)..." DEIR Appendix E: Traffic Impact Analysis, Nov 20. 2018 at p. 50. The DEIR's use of two completely different assumptions about job growth is internally inconsistent, and suggests that the estimates were self-servingly modified depending on whether the developer wishes the numbers to appear high (to appear like valuable economic development opportunity) or low (to appear like there will be less of a traffic impact).

Moreover, it is well-established that there is a steep downward trend in square-footage per employee, and offices for high-tech companies like the ones proliferating throughout the Bay Area tend to house approximately one employee per every 150 square feet—or less. *See, e.g., As Office Space Shrinks, So Does Privacy for Workers*, N.Y. Times (Feb. 22, 2015). Because of the high likelihood that new office space will be occupied by high-tech companies, the DEIR should use that assumption when estimating cumulative job growth. Otherwise, the DEIR fails to disclose all likely environmental impacts, as CEQA requires. Using the appropriately conservative assumption of one employee per 150 square feet, job growth for the Project could amount to 1,546 new jobs—over 50% of what the Hexagon estimates and 10% over the initial study figures. The only way to rectify such significant undercounting is for the developer to redo the analysis with the proper estimates and re-release the DEIR.

Cumulative Impact Analysis Incomplete and Flawed

The DEIR fails to consider and adequately quantify the impact of all relevant projects when considering the Project’s cumulative impacts. The DEIR considers the aggregate impacts only of projects within the City of East Palo Alto, despite the fact that nearby projects will also contribute to cumulative impacts on traffic, population and housing by bringing large numbers of new employees to the very same area as this Project. CEQA requires that a cumulative impacts analysis consider *all* “past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency.” CEQA Guidelines § 15130(b)(1)(A). The DEIR has relied on too narrow a scope of analysis.

For example, the DEIR fails to consider in its cumulative impact analysis the impact of the nearby Facebook Expansion Project and their proposed Facebook Willow Road Project, which will have significant impacts on traffic, population growth and housing demand in the same area as the Project.

These two ignored projects represent an almost 3-fold increase over the number of new jobs the DEIR estimates for the cumulative effect of projects in the area—without even taking into account the likely multiplier effect of bringing these new jobs to the area. The DEIR fails to provide an explanation of why it has so artificially limited the geographic scope of the cumulative impacts analysis for, traffic, population and housing, as CEQA requires. *See* CEQA Guidelines § 15130(b)(3) (Lead agencies must “provide a reasonable explanation for the geographic limitation used” for a cumulative impacts analysis.).

In addition, per the DEIR, ABAG is projecting that jobs in the City will increase from approximately 2,920 in 2015 to 3,540 in 2035. DEIR Appendix A: Initial Study, Dec. 2018 at p. 68. This change in job numbers is equivalent to 620 over a 15-year period. However, the cumulative increase in jobs generated by the Project and its sister building, University Plaza, across the street is almost 2,800 jobs that would be realized in seven years. This is a staggering 352% increase over the ABAG 15-year projection. Yet, no noteworthy cumulative impact analysis on population growth and housing demand was proffered in the DEIR. Lastly, we note that the proposed University Circle project, just a five-minute walk away from the Project has the potential to add an additional 1,000 jobs in

close proximity. The DEIR's failure to take these projects into account when evaluating cumulative impacts renders the analysis legally insufficient.

The Local Indirect Job Creation Multiplier Effect Was Not Studied

The DEIR should have accounted for the nexus between higher-income future tech office employees and the subsequent multiplier effect these new jobs have on lower-wage job creation. This multiplier effect will add many new jobs to the local economy that pay less than a sufficient wage to house these lower-income workers locally. This will require new lower-wage workers to travel farther to work, thus increasing traffic congestion, vehicle miles traveled and greenhouse gases. To the extent the new lower-wage jobs created by this multiplier effect move to EPA to avoid the commute, they would put pressure on the limited housing stock and increase housing prices – a crucial factor that the DEIR fails to assess.

Numerous academic researchers have found significant evidence of the presence of a local multiplier effect. Enrico Moretti, a scholar at UC Berkeley, has determined that for each additional skilled job created, 2.5 jobs were also generated in the local non-tradable goods and services sectors, and an additional unskilled job created 1 job in the local non-tradable sector. *See Moretti, Enrico, Local multipliers American Economic Review: Papers & Proceedings 1-7 (May 2010).* Furthermore, Moretti finds that highly skilled technology workers, such as those at Facebook, have a multiplier effect of five service jobs for each technology job. As an example, he cites Apple Computers directly employing 13,000 workers but generating 60,000 additional service jobs. 36,000 of those additional 60,000 jobs are lower paid, unskilled positions, such as restaurant or retail workers. *See Moretti, Enrico, The New Geography Of Jobs.*

All of the additional workers created by this multiplier effect would place demands on the local housing market, increase demand on our transportation systems and/or travel in vehicles that produce greenhouse gasses. By not taking into account the additional low-skilled jobs created by the Project, the DEIR fails to accurately determine the impact on housing needs, indirect residential displacement, traffic congestion, and air quality.

Park Shadowing Impacts

The DEIR shadow study shows the 125 foot, eight-story proposed building casting shadows on an active park and its playing field. We disagree with the conclusion in the DEIR that “A portion of the park to the north beyond the playground would be substantially shaded in the afternoons during winter months; however, this incremental increase in shading would not impact active park uses (only existing open areas planted with grass) and would be temporary as the sun moves westward during winter afternoons.” DEIR at p. 45. The areas referred to as “open areas planted with grass” are used by youth for pick up soccer and football games. Shading the area could make that impromptu playing field unseasonably cold. A more nuanced shadow study for the late fall and early winter months should be done. Alternatively, reducing the building's height should also be studied within a revised shadow study.

As we stated in our NOP letter, usable open space is a much-needed amenity in East Palo Alto, and any shadows cast on Bell Street Park reduce this scarce community amenity.

Pedestrian Impacts

The University and Donohoe intersection is one of the busiest in the city, carrying a significant load of automobile, pedestrian and bicycle traffic. This vital intersection is a connection for EPA residents living on the Westside of East Palo Alto, particularly the many dozens of families with children who walk over the University Avenue bridge daily. The DIER states that there are less than significant impacts to pedestrians. DEIR at p. 98. However, widening of Donohoe at University will make an already long and difficult crossing for children, families, and seniors that much more difficult. In addition, the inclusion of two driveways on University, leading to and from the proposed 773 space parking garage, will make it more difficult for pedestrians to walk in this area. The DEIR should address these two issues and discuss mitigations to their impacts.

55% TSM Project Alternative

The DEIR describes this alternative but does not give sufficient detail to understand its viability as an achievable alternative. DEIR at p. 124. Without a more robust description of the methods and intensity of the TDM programs, the public cannot reasonably understand if this alternative should be championed or abandoned.

There are plenty of ways to reduce the Project's transportation impacts such as vehicle trip caps, vanpools to areas where employees live, departure and arrival incentives, pricing of parking, penalties for not meeting the set goals, showers and changing rooms for cyclists, etc.

Adopting measures like these and those mentioned in the EIR could get the Project to the 55% threshold. The EIR must identify why these measures are or are not feasible, and how many measures would be needed to reach a 55% threshold. The city could require the applicant to adopt and implement enough of these measures to ensure that the Project's impacts would be mitigated to a less than significant level.

Thank you again for your consideration of our comments and for this opportunity to comment on the University Phase II Project DEIR. It is our hope that when we read the full Environmental Impact Report, we will see our concerns included. We look forward to answering any questions you may have.

Sincerely,



Tameeka Bennett, on behalf of: *Community Legal Services in East Palo Alto, Faith In Action Bay Area, Youth United for Community Action & Urban Habitat*

January 25, 2019

Guido F. Persicone
1960 Tate Street
East Palo Alto, CA 94303

Subject: Draft EIR Comment, University Plaza Phase II Project

Dear Mr. Persicone,

Great work on the environmental documents. My concern is that the Draft EIR is inadequate, because the Initial Study incorrectly labeled the Land Use/Planning b) as a Less Than Significant Impact. My concern stems from Land Use and Urban Design Policy 10.14 of the Vista 2035 East Palo Alto General Plan. Policy 10.14 reads as follows:

***Ground floor retail.** Require that ground floor retail space be included in new projects along the entirety of the University Avenue Corridor. This should be done in a way that creates nodes of pedestrian-oriented retail activity at key intersections (such as Bay Road, Bell Street, and Donohoe Street). Exceptions to requiring retail space within a project may be made when projects provide community benefits or meet other community goals.*

There is no ground floor retail currently in the proposed project which will negatively impact air quality and job creation for EPA residents. Without restaurants in close proximity to the site, many employees will be forced to drive increasing air pollution. Additionally, no retail means a lost opportunity for local jobs for EPA residents. For these reasons, I believe the Initial Study Land Use/Planning b) needs to be addressed in the Draft EIR as a Potentially Significant Impact or Less Than Significant with Mitigation Incorporated.

Other concerns with the proposed project include the anticipated two-year construction period and no housing.

For all the concerns/reasons mentioned above, I favor the Reduced Intensity Alternative with ground floor retail.

Sincerely,

Robert Miller, MUP
107 Azalia Dr.
East Palo Alto, CA 94303

February 7, 2019

Guido Persicone
Planning and Housing Manager
City of East Palo Alto
1960 Tate Street
East Palo Alto, CA 94303

RE: The Sobrato Organization’s Comments on the University Plaza Phase II Draft Environmental Impact Report, SCH 2017052045

Dear Mr. Persicone:

The Sobrato Organization (“Sobrato”) has completed its review of the Draft Environmental Impact Report SCH Number 2017052045 (“DEIR” or “Project EIR”) prepared to comply with requirements under the California Environmental Quality Act (“CEQA”) for the University Plaza Phase II Project (“Project”). The Project will be located on an approximately 2.5 acre parcel at 2111 University Avenue (“Project site”) in East Palo Alto, California (“City”). The Project is Phase II of a larger project – Phase I is the currently operational University Square Project located at 2100 University Avenue, a 214,000 square foot (sf) office building (“2100 University”). 2100 University is leased to Amazon, and is home to the new East Palo Alto Career Center operated by JobTrain to provide a vocational training and comprehensive support services program. Our purpose is to work with City staff to bring this long process to a mutually beneficial conclusion, and we appreciate the opportunity to provide comments on the DEIR, which are as follows. General comments are first, followed by comments specific to particular sections in the DEIR.

GENERAL COMMENTS

1. The Project image used for the DEIR cover page and Initial Study cover page is outdated. This should be replaced with the most recent Project design in the Final EIR, with an explanatory note indicating that the image used in the DEIR and the Initial Study was incorrect. Our recommended image is included as Attachment A to this letter.
2. Discussion of the proposed traffic signal at Euclid Avenue and Donohoe Street is described at DEIR page 93, in *Section 3.5 Transportation/Traffic*. For clarity, discussion of this proposed improvement should also be added to *Section 1.0 Introduction*, and *Section 2.0 Project Information and Description*, in relevant subsections. For example, it should be added to *Section 2.5.1, Site Design*, on page 22.
3. We note the existing public park currently encroaches on the project site (see Attachment B to this letter, Sheet C1.0 of the Project’s Planning Set submitted in April, 2018). The DEIR should address the existing park encroachment onto the Project site, in all relevant sections of the document, such as in the Project Overview paragraph on page v. Sobrato is committed to correcting this as a perpetual park easement.

SUMMARY

1. Please make the follow minor additions shown in underline and deletions shown in ~~strikethrough~~ to DEIR page v:

“The project site is bordered by park and industrial uses to the north, school district office and school bus parking uses to the west...”

“The existing ~~four~~ three parcels would be merged into a single parcel.”

With regard to the second correction, Sobrato has continued to work with the title company since the preparation of the DEIR, and it is more accurate to identify the Project site as three parcels. The same correction should be made to the identical sentence on DEIR page 17 in *Section 2.0 Project Information and Description*.

SECTION 1.0 INTRODUCTION

1. Tiering Should Be More Specifically Addressed: Because the Project EIR is tiered off the 2016 General Plan Update EIR, please include a more clear discussion of tiering to *Section 1.2.1, Focusing the EIR*, consistent with the Notice of Preparation for the Project (“NOP”)¹ (the Project’s EIR “will tier off the previous analysis completed for the City of East Palo Alto General Plan Update EIR, where appropriate.”²) It further explained that “[t]he EIR to be prepared for the proposed project will focus on evaluation of the project specific environmental impacts that were not addressed in the certified General Plan Update EIR.”³ It is important to clearly and specifically indicate that Project analysis is tiered, and to explicitly incorporate the entirety of the 2016 General Plan Update EIR by reference.

SECTION 2.0 PROJECT INFORMATION AND DESCRIPTION

1. Add Proposed Retail to Project Description: The current Project proposal does include approximately 4,500 square feet of ground-floor retail space facing Donahoe Street, in the garage building, and this information should be added to the Project Description on EIR page 17, Section 2.5. Sobrato notes that with regard to the City’s General Plan Land Use and Urban Design Policy 10.14, the Project is consistent with the purpose of the policy, to create “nodes of pedestrian-oriented retail activity at key intersections (such as Bay Road, Bell Street, and Donahoe Street)”. The retail is proposed near the planned, lighted Donahoe Street intersection because it will provide the best access for pedestrians and visitors in vehicles, and provides for a more commercially viable location than the portion of the Project site facing University Avenue.
2. Transportation System Management Plan: Please add a foot note cross-referencing the City’s Municipal Code prior Chapter 10.32 (Transportation System Management Plan) and

¹ City of East Palo Alto, Notice of Preparation of Environmental Impact Report, University Plaza Phase II Project, May 18, 2017, available at: <http://www.ci.east-palo-alto.ca.us/DocumentCenter/View/3360>.

² Id., page 2.

³ Id.

City's current Chapter 18.30.110 (Transportation Demand Management), and noting the "TSM" is the functional equivalent of a Transportation Demand Management (TDM) Plan.

3. Section 2.6.1: Per the City's General Plan at page 4-5, the "260 persons per acre" standard for the Mixed Use High General Plan designation is a purely *residential* standard. Please delete or add an explanatory note stating this is inapplicable to the entirely commercial Project.
4. Section 2.7: In DEIR *Section 2.7, Project-Related Approvals, Agreements, and Permits*, specifically list the following Project approvals:
 - Site Plan and Design Review
 - Lot Merger
 - Ministerial demolition, grading, building and occupancy permits.
 - Encroachment Permit (Caltrans)
5. Initial Study Project Description: These comments on *Section 2.0, Project Information and Description*, also apply to the Project Description included in the Initial Study.

SECTION 3.0 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

1. Construction Timing: Please update the anticipated construction schedule on EIR page 31. The updated, anticipated construction schedule remains the same, two years, but should be Spring 2020 to Spring 2022.

SECTION 3.4 NOISE AND VIBRATION

1. Mitigation Measure NOI-1.1: To ensure feasibility of construction on an urban infill site, Sobrato proposes revising the measure on EIR page 76 (and at EIR page x) as follows, with additions shown in underline and deletions in ~~striketrough~~ to achieve the same performance result in a manner more feasible for a large construction project:

To the extent feasible, Avoid using vibratory rollers, tamper, or dropping heavy equipment within 20 feet of a shared property line. If avoidance is infeasible, perform vibration monitoring within 20 feet of share property lines throughout construction work, to ensure that construction-related vibration levels do not exceed the 0.3 in/sec PPV threshold (adjusting work and equipment as necessary to meet this standard).

SECTION 3.5 TRANSPORTATION/TRAFFIC

1. Beneficial Impacts of Project-Sponsored Traffic Improvements Should Be Addressed: This section of the DEIR currently does discuss the beneficial impacts of proposed Project-related traffic improvements – both in the project specific and cumulative settings. As discussed in the Project's Traffic Impact Analysis ("TIA") and demonstrated in the data tables, planned Project-sponsored improvements "will improve access to and from the

project site as well as significantly reducing existing congestion in the area. Compared to the existing unsignalized intersections, the new coordinated signal system will enhance the intersection capacity and minimize the queue spillback that currently impedes traffic flow on University Avenue and Donohoe Street.” Narrative discussion of these beneficial impacts should be added to the EIR, to reflect the service improvements shown in EIR Table 3.5-2 (significant service improvements between Existing Conditions and Existing Plus Project Conditions Without Loop Road for intersections 6, 14, 15, 16, 17, 18, and 20); and EIR Table 3.5-5 (significant service improvements between Cumulative No Project and Cumulative Plus Project Without Loop Road for intersections 6 and 14-20). These service improvements are not, but should be, described and discussed in Section 3.5. Further, all of the above-identified beneficial Project impacts should also be addressed in the Summary section of the DEIR, starting at page v.

2. Mitigation Measures C-TRAN-1.1 and C-TRAN-1.2: Because the impact on the intersections of Euclid Avenue and Donohoe Street/East Bayshore Road occur in the *cumulative condition*, the measures on DEIR page 102 should note that a *fair share* toward construction of the improvements is appropriate. While Sobrato is willing to initially fund these improvements as part of implementation of the Project, (1) we recommend that this improvement be added to the City’s Capital Improvement Program so that improvements can be credited against future fees, or (2) we reserve the right to seek a reimbursement agreement for the City to reimburse us over time as the City collects fees or fair share contributions from benefitting projects.
3. Mitigation Measure C-TRAN-2.1: The fair share contribution identified in this measure is appropriate, but Sobrato requests that the fair share be more specifically identified. And, we recommend that this improvement be added to the City’s Capital Improvement Program and any fair share contribution be credited against future fees.

SECTION 3.6 UTILITIES AND SERVICE SYSTEMS

1. Sobrato recommends the following additions shown in underline and deletions shown in ~~strikethrough~~, for clarity:

On page 108, under heading Wastewater:

“Wastewater collection and conveyance services are provided to the project site...”

On page 108, under heading Storm Drainage:

“The existing project site is partially developed with office buildings, as well as paved and compacted gravele~~d~~ parking areas and is approximately 46 percent impervious roof and pavements, 40 percent compacted gravel, and 14 percent landscape.”

On page 109, under Thresholds of Significance:

“~~Have sufficient~~ Require water supplies available to serve the project from beyond existing entitlements and resources, ~~or are new or expanded entitlements needed~~...”

SECTION 4.0 GROWTH-INDUCING IMPACTS

1. No Planned Unit Development Rezoning: Per the General Plan and recently adopted Comprehensive Zoning Code Update, the Project is consistent with the MUH zoning and does not require a PUD, which should be corrected on DEIR page 115.

SECTION 7.0 ALTERNATIVES

1. Beneficial Project Impacts Should Be Addressed: As described above with regard to DEIR *Section 3.5 Transportation/Traffic*, the Project's planned traffic improvements would in fact have *beneficial* improvements on service conditions, which should be addressed more thoroughly in the EIR, including in *Section 7.0 Alternatives*. For example, a subsection *7.2.3 Beneficial Project Impacts* could be added. For each relevant alternative, the loss of the identified beneficial impacts should also be addressed, particularly considering that improved traffic conditions is identified as a Project objective at DEIR pages 29, 119.

Thank you for the opportunity to provide comments on the DEIR. Sobrato continues to look forward to bringing this exciting development to the City.

Sincerely,

Tim Steele



Vice President of Real Estate, The Sobrato Organization

Attachments

Attachment A – Replacement Cover Page Image

Attachment B – Sheet C1.0 Showing Public Park Encroachment

Attachment A



Attachment B

UNIVERSITY PLAZA
PHASE II
2111 UNIVERSITY AVE

The
SOBRATO
Organization



ISSUES AND REVISIONS		
NO.	DATE	DESCRIPTION
	07.29.16	PLANNING SUBMITTAL
	03.02.18	PROGRESS SET
	04.05.18	PLANNING RESUBMITTAL

PROJECT NUMBER
20160076

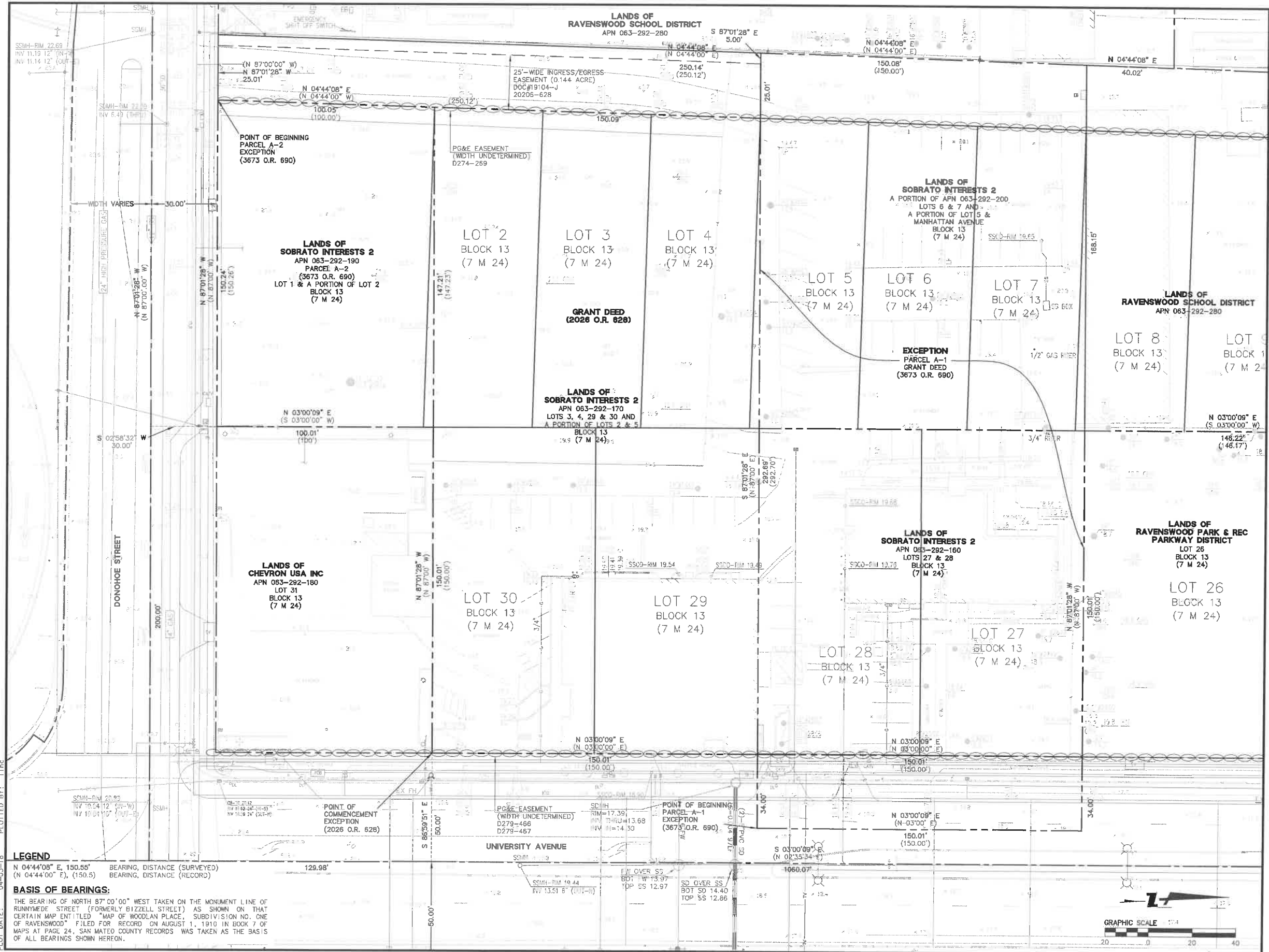
SHEET TITLE
**EXISTING CONDITIONS
PLAN**

SCALE
1"=20'



SHEET NUMBER

C1.0



ALL DRAWINGS AND WRITTEN MATERIAL APPEARING HEREIN CONSTITUTE ORIGINAL AND UNPUBLISHED WORK OF THE ARCHITECT AND MAY NOT BE REPRODUCED, USED OR DISCLOSED WITHOUT WRITTEN CONSENT OF THE ARCHITECT

DRAWING NAME: \\BKF-cv\detroit\2016\160076_EPA_Ph2\ENG\PLANNING\SHEETS\C1-EXISTING CONDITIONS.dwg
PLOT DATE: 04-03-18

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase 2 Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am Noemi Mendoza, a 17-year-old senior at East Palo Alto Academy. My connection to the community is a deep connection due to the fact that I was practically raised in the town. I lived in East Palo Alto up until the 6th grade but I continued to attend school in East Palo Alto.

I would like to raise concerns to your attention regarding Draft Environmental Impact Report:

1. Traffic is a huge impact on the community. Every day there's a traffic jam. In the morning, there is traffic on Pulgas going towards the post office. In the afternoon, there is traffic all the way down University. In my personal experience, I have to drive myself every day to school as well as back home, and it takes me 20 minutes to exit East Palo Alto and onto 101, which is only 2 miles. When Amazon "moved in" to the community, the traffic began to grow and my time, in traffic, grew 5 minutes. If another big company "moves" in, then imagine how much traffic will increase?
2. The necessity of the building is concerning. When the other building had first opened, everyone was so very excited because it was something new and we had bad experiences with Facebook obtaining properties and rent rises for the people. Everyone was excited because there was a new option for people looking for a serious career in Amazon or a job in a general. Amazon was considering it until they weren't anymore. How will this building benefit the people in ways the other building couldn't?

In summary, this building worries those who are trying to make it out in East Palo Alto and this infrastructure is bringing up concerns that the community has on East Palo Alto's future as a united city of color.

Sincerely,
Noemi Mendoza
High school senior, EPAA

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase 2 Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am Patty Cornejo. I am a high school senior at East Palo Alto Academy. I have been a resident of East Palo Alto since the day I was born. I am now 17 years old, turning 18 in November 2019.

I would like to raise concerns regarding The Draft Environmental Impact Report:

1. It's getting too expensive to live in East Palo Alto.
 - a. Housing expenses in East Palo Alto have gone up dramatically ever since Amazon moved in on University Ave. From my own personal experience, my single mom raising four kids on her own, couldn't afford to pay rent anymore. She decided to buy a cheaper house in San Joaquin County. We moved out of the Woodland Park Apartments in September 2018. We had to leave our childhood memories behind.

2. Traffic in East Palo Alto has increased.
 - a. I believe traffic has increased ever since Amazon moved in. Around 4 or 5 p.m there is traffic on University Ave. People coming from Palo Alto and people driving home from work or school sit in traffic for at least 30 minutes every day. I myself have sat in traffic for so long just trying to get to a soccer game behind the St. Francis church. It is ridiculous. An article published by Kron4 News by reporter Rob Fladeboe says, "There are so many traffic problems across the region but Peninsula commuters can no doubt agree that the daily backup along University Avenue in Palo Alto is one of the worst." This proves that others do believe the traffic on University Ave has been the worst.

In summary, having a new project being built on University Ave would make things worse. This would worry the locals even more. Please see below for additional details and pertinent literature.

Sincerely,
Patty Cornejo
Senior at EPAA

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase 2 Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am Nancy Bazan, an 18-year-old senior at East Palo Alto Academy. My connection to the community is due to the fact that I was raised in the town.

I would like to raise a couple of concerns to your attention regarding Draft Environmental Impact Report :

1. Traffic is a HUGE impact on this community. Every morning I leave my house to get to school and there is traffic everywhere. Every street I take is jammed in traffic. It usually takes me about 4 minutes to get to school, but with all the traffic that builds up every time there is a new building, the traffic jam increases dramatically. It now takes me about 10 minutes to get to school which is about 3 streets away from my house. I believe that if more companies "move in" then traffic is most definitely going to increase even more.
2. The necessity of the building isn't really a necessity. The building is only taking up space that no one can use or work there. From what I know the building was supposed to hire people from the community but no one from the community works there. Everyone was excited because there was a new option for people looking for a serious career in Amazon or a job in general. It's a big building that doesn't need the whole space.

In conclusion, the building shouldn't be here because it doesn't help our community and it brings concerns about East Palo Alto's future.

Sincerely,
Nancy Bazan
High School Senior, EPAA

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase 2 Project]

To Whom It May Concern,

My name is Esperanza and I am 18 years old. I have been a resident in East Palo Alto for four years. I can connect to this community because I have lived here for a while and I have seen how East Palo Alto has changed. In these past four years. I have seen that it has gotten better about the violence. However, I have seen how so many people have had to move out.

I believe that we shouldn't build a new office building here in East Palo Alto due to their being so much traffic already and if it follows the previous Sobrato Building will not provide jobs for East Palo Alto. When going anywhere in EPA there is always traffic. For example, when I go home after school it takes me about an hour just to get to my house which is only 2 miles away. Sometimes when I'm on my way home I see people breaking traffic laws. People will go into opposing traffic to get to their place faster or run red lights. It makes it feel unsafe. When I am walking or crossing the street and they run red lights. I feel like East Palo Alto is not safe for the residents. If we get more traffic here then there will be more injuries and fatalities.

I believe we shouldn't approve this building as it currently planned in EPA is because then the house rent will get more expensive. People will have to leave due to not being able to afford housing anymore. When Facebook and Amazon got here the increasing demand raised the rent. Many of my family had to move out because the rent was too high and unaffordable. If you approve a new office building then rent might increase and more people will have to leave. The minimum wage is low so the higher rent will cause many to leave. Some of the EPA community barely made it through last increase of rent and they might not make it through this one.

Sincerely,

Esperanza Traelo

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am Erika Ceron, I am 19 years old, in my senior year in East Palo Alto Academy. My connection with the community has been a long time, I have lived in EPA for four years and is a quiet and nice community.

I would like to make a short comment about two of the biggest problems that affect my community in EPA like the traffic and the rent, regarding Draft Environmental Impact Report: University Plaza Phase II Project:

1. Regarding Traffic

1. Right now in East Palo Alto it is difficult for people to get early to their job, for example when I take the bus to go school I pass more than two hours in the traffic and many time I'm late. Also, I have seen that is not safe for kids to walk in the street because they're a lot of cars who drive really fast that is why is good to stay in the home because go out is really dangerous and is difficult to be in one place to other.

2. Regarding Rent

1. Another concern for my community is the rent. Right now in East Palo Alto the rent has been the biggest problem for people of low income. also I see in my community is that many people are moving because the rent is too high and that make our community bad because all people who lived there a long time there are living there place where they have been familiar.

Sincerely,
Ericka Ceron
Student of EPAA

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am 17 years old, and I am a student from East Palo Alto Academy. My family has been living in EPA all their lives, and I moved to EPA in 2017.

I want to raise concerns about the traffic problem in East Palo Alto. The problem with traffic is that it affects people's schedule. For example, my mother takes about a whole hour to make me home from school even when we live about 20 minutes walking. Not only that, after school, she has to either drop me off practice or work which waste her time more because she also has to take care of my little siblings and chores.

Another Reason why I brought up this concern is that it could be a safety hazard. More Traffic means more cars which can lead to accidents. Either with the vehicles themselves or pedestrians. I have many cousins in Elementary school who walk home when school is over. So I'm also worried about their safety and other kids as well.

In conclusion, I think that traffic control is one of the most critical problems for the East Palo Alto city. Also, would adding more office buildings like the "University Plaza Phase II Projects" add more difficulties to traffic or would there be other solutions for it.

Sincerely,
Herberth Trejo
Senior at EPA Academy

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To Whom It May Concern,

Thank you for the opportunity to comment on the Draft Environmental Impact Report: University Plaza Phase II Project. I am Maria Carbajal. I am a high school senior at East Palo Alto Academy. I come from the State of Washington and have been living in East Palo Alto for 8 years. I have been fortunate enough to see East Palo Alto turn into the city it is now, new buildings, new homes, and how the population in East Palo Alto has grown. I am now 17 years old and will be turning 18 in June 2019.

I would like to raise concerns regarding The Draft Environmental Impact Report:

1. It's getting too expensive to live in East Palo Alto.
 - a. Housing expenses in East Palo Alto have gone up dramatically ever since Amazon moved in on University Ave. From personal experience, when my parents were looking for a place to live, my mother had to lie and say that they only had two children instead of four in order to live in Woodland Park Apartments. Eventually, we later found a house we could rent but only because my parents worked extra hours and saved money to move out. Now that Amazon has joined the community many residents from East Palo Alto are moving out of the city due to the rent and housing prices rising.
2. Traffic in East Palo Alto has increased.
 - a. I believe traffic has increased ever since Amazon moved in. Around 4 or 5 p.m there is traffic on University Ave. People coming from Palo Alto and people driving home from work or school sit in traffic for at least 30 minutes every day. Traffic has been a problem in East Palo Alto, due to the new companies that have come into our neighborhoods such as Amazon.
 - b. An article published by Kron4 News by reporter Rob Fladeboe says, "There are so many traffic problems across the region but Peninsula commuters can no doubt agree that the daily backup along University Avenue in Palo Alto is one of the worst." This proves that others do believe the traffic on University Ave has been the worst.
3. 30% of Workforce From the City.
 - a. With big companies coming into the city, many people have trouble finding good jobs that allow them to have enough money to pay rent, and pay bills. East Palo Alto has an ordinance that requires large employers to hire at least 30% of their workforce from the city when Amazon came into the city they made a deal with the council to bypass the ordinance. This made a lot of people from the community upset and residents, along with students from East Palo Alto Academy, picket in front of the Amazon offices.
 - b. Having 30% of the workforce from the city will make residents more comfortable bringing in future companies. It will also allow the residents of

East Palo Alto to interact with the employees of the new building. I believe that the ordinance should become a form of a law that should be done by new companies coming in. I strongly believe that having 30% of the workforce as a law will make residents feel like they have an opportunity to have a good paying job.

In summary, having a new project being built on University Ave would make things worse. This would worry the locals even more. Please see below for additional details and pertinent literature.

Sincerely,
Maria Carbajal
Senior at EPAA

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am Benjamin Zarate-Bautista, I am 18 years old, and I am a student of East Palo Alto Academy High School. As a person who lives in this city, everything that happens here is something I need to know because it maybe can be good for me or maybe not. I have been living in East Palo Alto for 3 years.

I would like to raise concerns about the new project that maybe will be constructed at East Palo Alto. the new building. I do not approve this project because it won't be good for the city of East Palo Alto in many ways. The first one would be that because of this new building, traffic at university avenue is going to increase by a lot, just having the Amazon, traffic is a big problem for the citizens of East Palo Alto because they can't move to work fast or be on time where they need to be. Traffic won't be just one problem, rent will increase even more than what it did because of the building of Amazon, if the rent increases, even more, it would make people from East Palo Alto to move to different cities because of the rent. And last, for what I know, Amazon hasn't hired many people from this city to have a job in that company, I think that's something that people from East Palo Alto need to talk about.

In summary, I just think that I do not approve of this project right now because I don't see good benefits for East Palo Alto and its citizens.

Sincerely,
Benjamin Zarate
Senior at East Palo Alto Academy

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To whom it may concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report; University Plaza Phase II Project. My name is Ailyn Estrada and I am a senior at East Palo Alto Academy and a member of the East Palo Alto community. I have lived in East Palo Alto all my life.

I would like to raise concerns regarding the document "Draft Environmental Impact Report; University Plaza Phase II Project."

According to the article, the city is thinking about approving the construction of the 8-floor building in East Palo Alto. My concern is the proposal that the Sobrato Group has about traffic and which according to the article by the daily post by Emily Mibach says, "Improve traffic flow and safety with signalizations of the Euclid Avenue/East Bayshore Road/Donohoe street intersection and modifications to the northbound US 101 on-ramp . . ." the EIR does not make clear how serious our traffic situation is. It takes about 30 minutes to get from one side of the city to another. For example from Myrtle street to Ralmar, it's 1 mile which should take 6 minutes but takes 15-20 minutes during traffic time. I also believe that by you allowing the company to add another building which will be one of the tallest buildings in East Palo Alto, of course, it will cause more traffic because more people mean more transportation which equals more traffic. During and after construction. Being a resident of East Palo Alto, I know how frustrating it is to waste 30 minutes in traffic just on East Palo Alto, to get home when in reality it should only take about 5-10 min to get around the city. If this building is going to happen I think that it would be fair if the people who will work at the company should have different schedules so that traffic will increase. For example, morning traffic stats round 8-9am, it would be helpful if the workers started around 10 or 11 a.m. instead and should get out 2 hours after traffic hour in the afternoon.

Another reason why I don't feel you should approve the addition of an eight-floor building is that I feel that area can be of better use to the community. I think that it would be so helpful if the city allows the parking lot space to be also available to the residents of East Palo Alto. As we all know, parking in East Palo Alto is very difficult to find and there are even times where residents have to pay monthly to park on Menlo Park streets. This forces some people to wake up extra early to get up and walk all the way to their car to drive to work. I know this because both my stepdad and uncle had to wake up at 5:30 am to walk to Menlo Park streets to get to their car with an additional monthly \$35. So I feel that if we add a parking lot in that area that is available to the public it will benefit the residents of the city which is all that we ask.

In conclusion, I think that there are many reasons why our city won't benefit from your eight-floor building but traffic is one of our cities major concern. I also feel that if we can do something more useful with that space like parking lots, why shouldn't we? Please see below for additional details and pertinent literature.

Sincerely,
Ailyn Estrada

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To whom it may concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am a seventeen years old student at East Palo Alto Academy, and even though I don't live in EPA I work in EPA and I care about the changes that are happening in EPA.

I would like to raise concern regarding the Draft Environmental Impact Report

Interim City Manager Sean Charpentier, pointed out that people currently spend about 83 seconds at the Donahoe and University intersections waiting to get through. The students at EPAA including me know that there is always a lot of traffic on University and Donahoe, and always take about thirty minutes to go over the University bridge.

Regarding the project objectives, how do you plan on getting the people of EPA more involved? The Amazon building has been up for about two years, Going home from school I always past that building and wondered what is happening inside. I've never seen an EPA person work there. So why build a building in EPA that does not provide explicit opportunities for people from EPA in the workforce. In 2017 Sobrato and Amazon made a deal with the City Council to let the company bypass the city ordinance. Amazon agreed to help resident find jobs elsewhere, but there is no report of that having happened or success.

My concern is that your buildings don't include enough community input and cause us to stay even longer in traffic.

Sincerely,
Karen Downs.
Senior student at EPAA

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase 2 Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am Raul Jimenez, a 17-year-old and I will be 18 years old in November 2019. I am a senior at East Palo Alto Academy. My connection to this community is a strong connection Due to the fact that I have lived in East Palo Alto my whole life.

I would like to raise concerns to your attention regarding Draft Environmental Impact Report:

1. Traffic is a huge impact on the community. On Monday- Friday there is a huge traffic jam that started when all the big named companies moved in around East Palo Alto. In the morning there is traffic going towards Palo Alto and around 3:30 there is traffic going towards the Dumbarton bridge. Although there are different routes to take those are also covered with traffic from the workers who work for those big companies. Time in traffic grew to 5 minutes, now imagine if this 8 story building is built the 5 minutes can turn into 10-15 minutes. Then realize how much traffic would increase?
2. Another concern that people have is the housing expenses are rising dramatically. One apartment for 1 room and 1 bathroom goes for 1,500-3,500, Although houses in this area go for around 4,000 to 6,000. These prices started going up due to the fact that the employees of these new companies need a place to stay. And more apartment companies have raised their prices to get more money, but residents that have been living in East Palo Alto can not afford are being forced to move out of this city.

In summary, this building worries those who are trying to make it out in East Palo Alto and this infrastructure is bringing up concerns that the community has on East Palo Alto's future as a united city of diverse ethnicities

Sincerely,
Raul Jimenez
High school senior

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. My name is Vake Fonua. I am a current senior at East Palo Alto Academy. I've lived in East Palo Alto for the past 10 or so years and my experience here has been great. My parents moved my siblings and me to East Palo Alto since the cost of living in San Mateo was too high. East Palo Alto is such a small city yet the culture and diversity make up for it.

I would like to raise concerns regarding the purpose of the Environmental Impact Report. With all the vacant lots East Palo Alto has to offer and new projects coming up, many residents aren't too sure about the changes.

One of the major concerns is the shortage of water supply for the new construction site. In the article, **East Palo Alto halts new developments due to water shortage**, "Seventy vacant acres in East Palo Alto must sit idle for now, putting jobs, affordable housing, and hopes and dreams on hold for at least two years." In order for the project to continue, East Palo Alto must negotiate with other cities into making a compromise for a sufficient amount of water for their new buildings. Since water is scarce, I feel it would be for the best to hold off on any new construction sites until there is a firmly established water supply. Building the 8-story building will cause my community to fall since water is so limited, we should be savoring it instead of using it all for some building. We need to think about the people living in East Palo Alto, water is an essential resource.

Another concern is the increase in traffic this new building will bring. In the article, **Plan to fix traffic congestion on University Avenue in Palo Alto**, "It turns out those lights, from roughly Middlefield Avenue in Palo Alto all the way to the Dumbarton Bridge in East Palo Alto, are managed by three different agencies, the two cities, and Caltrans." Although the lights are planning to be synced, traffic will still reign. There are many people who make a commute to East Palo Alto since they either work or have children going to school there. Traffic is already bad as it is. On University, Middlefield, and coming to and from the Dumbarton Bridge, cars are stuck waiting for more than 20 minutes within the small city of East Palo Alto to get where they are supposed to be. Especially when its the afternoon, children are out of school and adults are going home from work. With this new building, many residents will have to suffer through traffic longer than they already have to.

The last concern the 8-story will bring is the rise in rent. Despite the many job positions that will open with the building, it will also cause businesses to raise the rent. With the rent raised, many people will have to relocate to find affordable housing elsewhere. These renovations won't benefit those with a low-income. East Palo Alto is an

affordable place to live, the majority of the community are minorities with low salaries. Housing is limited, there are only so many houses in a small city like this one. Many will be forced to move away from the only home they've ever known. For example, companies like Facebook and Amazon caused many residents who have been here for the longest to up and leave due to the increase in rent. It's so sad to see so many familiar faces moving out of East Palo Alto when they're whole life has been here.

In summary, this new building will bring opportunities yet so many setbacks that will be hard for my people and community to recover from. Short supply in water, traffic, and rise in rent is just the beginning but if this project continues then the consequences will worsen. Please take into consideration what has been said throughout this letter, the residents of East Palo Alto count on it.

Sincerely,

Vake Fonua

High School Senior & Longtime Resident

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To whom it may concern,

Thank you so very much for the opportunity to comment and speak on the draft for the environmental impact report for the University Plaza Phase II project. I am a senior at East Palo Alto Academy. I was born in Stanford hospital and I have lived in East Palo Alto all my life. I was raised in a lovely community but at the same time, my community has undergone major changes. In these changes have impacted everyone living here but if I am frankly honest the changes that East Palo Alto has undergone within the past 10 years has impacted the whole country. For example, although Facebook is in the borderline of Menlo Park and East Palo Alto, the number of tourists that pass through EPA to take a picture of the Facebook Sign. Having corporations like these have had made major demographic and financial changes, and put East Palo Alto on the map. We are being looked at differently as a result of the new social and economic changes.

If we weigh the costs with benefits such as how much neighborhood violence has decreased, how many more jobs have been made available with the invitation of stores like Target and Home Depot. I worry about the fact that citizens in our community are already struggling to pay rent and the city wants to bring in a building that will increase demand for housing. The current inhabitants of EPA already are struggling with the supply in the city and the increased pricing. Bringing in a new building will derail the focus of making EPA a place where the median household can afford to pay rent. With all this being said I would like to raise my concerns regarding the article, " Put Big building to vote...." According to the article, the city wants to approve the building of an 8 story building in East Palo Alto.

My biggest concerns are the proposals which states, "improving traffic flow and safety with signalization of the intersection and modifications to the northbound US-101 on-ramp." I am not sure that the big picture of resolving the traffic issue in East Palo Alto will be fixed with some lights and a ramp especially if the city is approving an 8 story building that will bring in more traffic, people, and costs. Not only will the city have to deal an additional 30 minutes to get from one end to the other end of the city which is less than 5 miles. The community will be in distress due to the existing conflict with traffic that will increase due to this 8-floor building. I also worry about the legacy of this community, the culture and the people obviously change but with corporations like Facebook in our backyard, Amazon in the middle of our city and many more multi-millionaire companies. I worry about how many more friends I will have to say goodbye to because they can't afford rent. I worry about how demanding the economy can get that all impoverished families will have to abandon their homes because instead of the community city council approving more buildings for affordable housing

they are approving plans for an 8-floor corporate office space for the enrichment of the rich.

In summary I strongly believe that the community needs to be heard this time around, I would hate to see what happened with Amazon happen again, According to Palo Alto online, "East Palo Alto's long-standing first source jobs rule-of hiring up to 30% of local residents at new businesses have been set aside but the city council to make way for Amazon on the new University square project." This behavior is negligent and it should not be tolerated another time around.

Sincerely,

Meliza Gomez

RE:[SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To Whom It May Concern,

Thank you for the opportunity to comment on the Draft Environmental Impact Report: University Plaza Phase II Project. I am Jaquelin Henriquez, 18 years of age and a senior at East Palo Alto Academy who drives on a daily to and from home to school and work in Palo Alto. My family has lived here since 1995. My cousins and family know no other city than East Palo Alto. So to speak, my family has seen the drastic changes that our city has gone through and feel no happiness out of it.

I would like to raise concerns/ inform you of new information/ provide supporting evidence regarding [Purpose of the environmental impact report]. The first point I am making is the increase in traffic it will cause the community traveling in an out of university. Not only do we already had willow road doing construction, but also we do not know when that will finish. As said in the document, "The environmental impacts associated with the proposed project are primarily related to aesthetics, air quality, noise, transportation/traffic, and utilities and service systems resource area." Not only am I a new driver but I've also lived through amazon's traffic and noise they had caused when building. The nearby house owners/renters have newborns at home or have kids who wake up early the next day for school. Noise will impact their behavior and participation in class when they do not get enough sleep.

The second major point is changing the whole aspect of changing the city. For one the community members do not work at one of the major projects that the city has endorsed, Amazon. It may be certain community members do not have the amount of education to work for them, but even giving them the chance to view the building inside and what it's doing for the community would be better than having nothing. On top of this, Amazon did not accept people from the community, which will be different from this EIR project? "...contribute to the city's tax and job base, and provide flexibility to support companies to grow." This is from the [Project objectives, #2] where not only will this help our community but will there be more for us?

In summary, I've been in the community and see what has happened. I personally oppose having this building be constructed due to the loss of businesses already in the space. My grandparents use the pharmacy in the space where this 8 story building will be built if this project is approved. It will be a tragedy for the pharmacy to just disappear. In the end, it's a 50/50 good and bad use of space for the building, but no one will love to sit in traffic or see the building there with no one from the community. Let's not get ahead of ourselves, the community does not approve of this project to change our city.

Sincerely,

Jaquelin Henriquez

Senior at East Palo Alto Academy, and fellow East Palo Alto community member

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase 2 Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am a student at East Palo Alto Academy and I am 18 years old. I have been a resident for about 14 years in this community. I have many connections in this community, I go to the Boys and Girls Club and get help doing my homework, and get advice about the future.

I would like to raise concerns regarding The Draft Environmental Impact Report: University Plaza Phase 2 Project.

A major point I will be introducing is the traffic in University. I usually walk down the bridge to go to school. Most of the time I see this traffic that is non-stop. It starts around 7:30 and goes up to like 10. A lot of people stay stuck for 30 mins in this awful traffic. We need to find a better way for people to travel without being late to work, school, etc. Personally, I think the bridge is big enough, but the lights were messing up for letting other lanes go for a long time than the others. This needs to stop now.

My second major point is on how East Palo Alto is trying to build an 8 story building. This does not help the cause of our situations. Allowing more large buildings are forcing neighbors to move out of the city and find another community. Most of the people have been living here about 10+ years. It's not right for East Palo Alto to allow this. We need to stop this project in order to save our neighbors. Plus adding the rent, this building might need money, and that would be stealing from us through high rent. This is not a friendly gesture to our community that tries to live in peace.

In summary, we should find a better solution for the traffic in university and make plans for the future. Also, protesting and denying the approval of the University Plaza Phase 2 Project.

Sincerely,

Manny Perez

Senior at East Palo Alto Academy, and fellow East Palo Alto community member

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To Whom This May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. My name is Mino Tupou, I am 17 years old, I am a student at East Palo Alto Academy and as well as a resident in East Palo Alto. Living in East Palo Alto has pros and cons but I think the difficulties in East Palo Alto have to do with jobs with the residence and the new construction in East Palo Alto.

I believe that the city council in East Palo Alto give lost hopes to East Palo Alto residents by stating that when "East Palo Alto's has first-source jobs the rule is to hire up to 30 percent of local residents at new businesses has been set aside by the City Council to make way for Amazon in the new University Square project" (<https://paloaltoonline.com/news/print/2017/03/22/epachangesfirstsourcehiringruletoaccommodateamazon>). However, when Amazon building was built jobs were not available for residents and many were upset. Many of the residents of East Palo Alto are low-income families and need jobs closer to home. It is difficult to see my own neighbors struggle when there are available jobs down the street. I would like to push this issue in helping families in East Palo Alto to have a stable life. Please note this is an issue that shouldn't be overlooked and should be fair to residents who live here.

Another issue in East Palo Alto that is a major concern and it's the new ideas of construction in East Palo Alto. When Amazon was built and the new building of Facebook it took a strain on residents in East Palo Alto. Traffic is increasing in East Palo Alto and many are frustrated because they travel far for work since work in East Palo Alto is limited. In Addition, since more big corporate companies are moving in East Palo Alto property tax in East Palo Alto are increasing. Many who lived in East Palo Alto must move out due to the increase of rent or simply they can't afford it. These two issues are major and many in East Palo Alto are struggling to make ends meet. New construction in East Palo Alto could be a positive change in our city but I feel the way things are going it's hurting our community rather than encouraging us to love the city we live in.

In Conclusion, I would like to state that jobs and construction aren't the only issues in East Palo Alto but it is tearing our communities apart. I would like to inform those reading my letter to know that I love my city and it's my home please don't force my family or even my neighbors to move out because promises were broken.

Sincerely,

Mino Tupou

Student of East Palo Alto Academy

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am a resident of East Palo Alto and have been for 15 years and attend East Palo Alto Academy.

One major point in this community is promoting in-fill development by building up to 232,000 square feet of office space on existing commercial property consistent with the recently approved General Plan. In the article "Put big building to a vote: That's what one official says about this 8-story project" it mentions how this new 232,000 square feet the building would displace Drew's Pharmacy, which has been at University Avenue location for 45 years. Forcing it to shut down temporarily even would hurt its business dramatically. I personally have been to Drew's Pharmacy and have been going for a few years. This article explains how many community members of East Palo Alto are against this project.

Another major problem that I see is the 232,000 square feet building displace The Stanford Law Clinic East Palo Alto. The new building is going to be built next to The Stanford Law Clinic which would block the view. It's important that everyone knows were the community clinic, building anything that would impede someone from seeing where it is shouldn't be built.

A problem that I fear will happen is that the city of East Palo Alto will not try to enforce the hiring of 30% of its employees of the East Palo Alto. An example of this would be the Amazon building that was built a few years ago here in East Palo Alto. Have a big business move into our small community and not support us just feels like they're taking advantage of us. There needs to be an agreement where both parties get something in return.

In conclusion, I believe community members of East Palo Alto should hold a meeting with residents of the East Palo Alto community and see how we can come to an agreement. Having everyone voice head is important because you don't know who it affects.

Sincerely,

Luis Villalobos

Senior at East Palo Alto Academy

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact report: University Plaza Phase II Project. I am Shana Pouleva Brown and I am a senior at East Palo Alto Academy High school. My parents have been residents of East Palo Alto or over 40 years and I have been a resident here for 18 years now. I am connected to East Palo Alto because it is my home.

I would like to raise concerns and provide supporting evidence on why it is not effective to put an eight-story building to vote on University Avenue. In my opinion, our community is already being taken over by companies such as Facebook and Amazon, bringing in another building that is 8 stories is going to cause more of the East Palo Alto residents to leave and continue to be in poverty. If bringing in this building will create jobs for the residents of East Palo Alto than by all means it is useful, but if it does the same thing that Amazon is doing then it will not be effective instead it will only cause the residents in East Palo Alto to rebel. My overall point is if this eight-story building can create some type of employment for the residents of EPA than it will be beneficial but if you are creating this building with the mindset of not employing EPA residents than don't build in our community.

Also, I would like to raise concerns about what this building will physically cause. For example, when Amazon was built it created an increasing amount of traffic causing so many peoples commutes to be hours long. Thinking about what this eight-story building will cause in increasing the people coming in and out of East Palo Alto and increasing the commute home. Traffic is already horrible in East Palo Alto why make it worse.

In summary, I believe that creating an eight-story building with the mindset of not employing EPA residents will not be effective instead it will cause more and more residents in EPA to go poor and it will cause horrible traffic for commuters and for the residents that live in EPA.

Sincerely,
Shana Brown
Resident of East Palo Alto

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To whom it may concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. My name is Sade Aquino, I am a senior at East Palo Alto Academy. I've attended school in East Palo Alto and been a resident all my life. I am currently 17 and taking US Government Class where I have taken an interest in the new projects being done in our community. As to my siblings as well, we were raised in East Palo Alto our whole lives. I have walked the streets of East Palo Alto at a young age. The community is so strong and connected. All my friends are also part of East Palo Alto's community.

I would like to raise some concerns about some projects being planned. I've read that the Sobrato group plans on building an eight-story building. My main concern is Drew's Pharmacy. Drew's Pharmacy has been there for many years and has been an easy walking distance resource for many residents of East Palo Alto. My concern is where this pharmacy will go? People in the community will have to travel far to receive the medication they need and won't be able to be transported if the pharmacy is relocated. To add on to the pharmacy, I am concerned about the Stanford law clinic, The law clinic is to help clients in East Palo Alto. Students at Stanford come to represent their clients to help witnesses, other legal documents etc. They represent them in court if replacing this clinic residents in East Palo Alto won't have the resources everyone will need. This eight-story building will block the beauty of our city. The park, the YMCA and the Adult Center.

Traffic has been a major concern for many of the residents of East Palo Alto. So how will this new building contribute to the increase in traffic? As a teenager I work to provide a part for my family and traffic has caused me to be late for work and other errands. Many people I know have agreed. There are many people that go through East Palo Alto to get the Dumbarton Bridge. Traffic starts to appear around 3 pm now. It has become a big problem, being stuck in traffic for about 2 to 3 hours. Many students commute to school from different cities, cities like Hayward, Mountain View, and Redwood City. Traffic from Redwood City to East Palo Alto may take up to an hour when in reality it should take a 15 min drive. I can only imagine the new traffic that the new building will bring. Even kids from the community come late to school because of the traffic that should only take 10 minutes.

As a result of many projects being held by companies, for example, FaceBook, Google, and even Amazon. They are taking a big part of our community. Our city council is worried about water shortage, with all these new projects coming in, we fear that we won't have enough water for our community or even to share. Amazon had "promised" to give to East Palo Alto residents job opportunities but, pushed that aside. Many people are losing their home because of these companies, they can't afford their rent

and work is not providing a lot of income. Our future for our kids is at risk. Schools are being shut down and bought. What will happen next? Kids have to move homes to afford rent and go to a different school where they're not familiar with. This is also a part of traffic since, kids are forced to be relocated and kicked out of homes, the school has become packed, as well as homes. I can connect this to my family, my little nieces have to be kicked out of school because projects are coming in and removing them. This year they will shut down another school, just watching the community we lived in since little hurts at the fact, that our precious memories and being replaced and erased. As a community, we are trying to get together in hopes of hearing our voice. Our community of East Palo Alto is slowly disappearing.

Sincerely,

Sade Aquino

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To whom it may concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am Eduardo Virrueta, I am 17 years old and I go to school in East Palo Alto, at East Palo Alto Academy. I have been a resident of East Palo Alto for nine years. My connection to this community is good because I have lived here for a long time and I have seen how the community has changed so far.

I would like to raise awareness regarding Draft Environmental Impact Report: University Plaza Phase II Project. I don't think it would be a good move to build the eight-story building because it would cause more traffic than we already have. There is already enough traffic that we already here in university street and the new building would be right next to University Ave. I live over the ramp next to four seasons hotel and sometimes in the evening, the streets around my apartment get all full. Sometimes we even have to cancel plans because there is no way for us to get out into the streets since they are filled with cars.

Another reason I disagree with the building is that this building will not mean there will be more houses built. The building will create more jobs but if it does not create more houses then that will be bad for the community because more people will be trying to move into East Palo Alto and more of the people that live here will have to move out. It has never been fair that people that have lived here for a long time having to move out just because companies want to come here and cause the price of housing to increase, yet they don't provide reasonable support for the people of this community.

Another problem with this project is that there will be no job opportunities for the people of East Palo Alto. With this building, it will happen the same thing that happened with the Amazon building which did not help the people of this community very well. People of this community need jobs that allow them to afford to live here and to take care of their families. I think that if the project really wants to be done then that company will have to a hundred percent agree to have 30 percent of their employee be people from this community.

In summary, this building will would not really benefit the people of this community unless they agree to have 30 percent of their employees be people from this community. Even after hiring people from this community, there will still be more traffic and I doubt new houses will be built.

Sincerely,

Eduardo Virrueta

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase 2 Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. My name is Krishneil Prakash and I am a senior at East Palo Alto Academy. I have been living in East Palo Alto since I was born which is 17 years.

I would like to raise concerns regarding The Draft Environmental Impact Report:

I believe traffic has increased ever since Amazon moved in. Around 4 or 5 p.m there is traffic on University Ave. People coming from Palo Alto and people driving home from work or school sit in traffic for at least 30 minutes every day. I've experienced this first hand on our school bus. Our school bus always gets stuck in traffic on the University and it takes about 20-30 min to get to my stop at the corner of Laurel Ave. and Newbridge St. which is ridiculous.

Another reason why I believe we shouldn't build this building in EPA is that then the house rent will get more expensive. People will have to leave due to not being able to afford housing anymore. Ever since Facebook and Amazon arrived the increasing demand raised the rent ridiculously. It's almost the point where my parents can't afford to live here. So if the new 8 story building builds, how much more will rent increase to almost \$4000?

In summary, having a new project like this go through will it really benefit the community or the businesses coming in? If the Amazon can get away without hiring East Palo Alto residents why can't they? So overall I believe the approval for the new building isn't going to help anything in East Palo Alto.

Sincerely,

Krishneil Prakash

Senior at EPAA

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase II Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase II Project. I am Xiomara Guadalupe Constanza Rodas, I am 17 years old and I go to East Palo Alto Academy. I have been living in East Palo Alto since 2015. Since 2018 I started working in Canopy, a tree care program, which has made me care more about my community.

I would like to raise concerns regarding Draft Environmental Impact Report: University Plaza Phase II Project]:

1. As a member of Canopy, I am concerned with the removal of the trees at 2111 University Plaza.
 - a. I think the removal of the trees is a significant issue because as a member of Canopy I have learned that trees give us a lot of oxygen and can help our air quality in East Palo Alto. This is an important issue because without trees the environment is going to be affected as well as people's health. With the building, it will interfere with the local communities ability to grow trees because of the lack of sunlight that will be available to the area around the building. The trees will help offset the increased traffic because the trees will help purify the air from the car's exhaust which hurts our air quality. Comparing aerial photos of East Palo Alto with Palo Alto there are obvious differences in the environment and the number of trees. In East Palo Alto diseases like asthma are more likely than in Palo Alto and Menlo Park. In the document Existing Conditions Report (<https://www.ci.east-palo-alto.ca.us/DocumentCenter/View/3051>) on page 2-21 states that people in East Palo Alto are more likely to be susceptible to air quality because "Rates of common health conditions such as asthma and myocardial infarction (otherwise known as heart attacks or cardiac arrest) are indicators of population health. Data for these conditions is available only at the zip code level (zip code 94303). This zip code includes all of East Palo Alto and also parts of Palo Alto. As such, the results for East Palo Alto are expected to be higher than those shown here since overall health conditions (such as life expectancy) are lower than in neighboring Palo Alto. In zip code 94303, which covers all of East Palo Alto . . ." This means we need trees to reduce the bad air equality and reduce the diseases as respiratory diseases, lung cancer, and pneumonia which the report indicates are four and five in the list of most common causes of death.
2. The impact on the community by the potential loss of The Stanford Law Clinic.
 - a. I think that approving this building is going to affect many people in East Palo Alto because institutions like The Stanford Law Clinic will be

displaced. A lot of people of the community of East Palo Alto is going to be affected because this clinic helps a lot of our citizens through free legal assistants. Displacing this clinic will be a significant issue because many people from the low income are going to be really affected by leaving them without help.

In conclusion, before making all this decision people should know more about the advantages and disadvantage of choosing to build in the community. My viewpoint is if you are going to approve this building you should let the clinic be part of the project. I would also like to see more trees planted around the building for a better environment and healthier atmosphere. I would like to see this project happen without negatively affecting people's health or the assistance that they require.

Sincerely,

Xiomara Constanza
Student of East Palo Alto Academy

Re: [SCH Number 2017052045, Draft Environmental Impact Report: University Plaza Phase 2 Project]

To Whom It May Concern,

Thank you for the opportunity to comment on Draft Environmental Impact Report: University Plaza Phase 2 Project. I am Juliana Espino, 17 years old and I am a student at East Palo Alto. My connection to the community is to help my community members join with others to create a better vision for our community. I've been in the resident for 17 years.

I would like to raise concerns regarding Draft Environmental Impact Report: University Plaza Phase 2 Project. The most likely cause of the issue of this impact project is that there's a lot of traffic coming around. After school, almost every day I go walking to the bridge by University Ave to go to Palo Alto to go to work. I see that there is a lot of traffic coming by each intersection. As I saw a few months ago I witness car crashed right in the middle of the lights by University. It was the scariest thing ever because someone could have got hurt by luckily no one got hurt. By the way, each time I order a Lyft or Uber it gets caught in traffic and it makes me get to work 10-15 minutes late by the cause of traffic.

My second major concern regarding housing is very disappointed because my aunt had to move from East Palo Alto to Gustine, CA because of the high rent. Her husband has to come all the way to Redwood City/ East Palo Alto to work because in Gustine there is not really that much of employment since there is basically all land. Therefore, the more buildings are being built the more people from the East Palo Alto community have to leave their city, when they've been a resident for a long time. It's sad when you have to leave your city when you've been spending years in your city and have to either get evicted or leave the city because the rent is too high. My mom is currently in that situation where she wants to move out to Modesto because she can't afford to live here anymore

In summary, please don't let no more buildings be built, fix traffic, and keep our water stable for those who need it.

Sincerely,

Juliana Espino

Appendix B: Construction Air Quality & Health Risk Assessment

ILLINGWORTH & RODKIN, INC.
Acoustics • Air Quality

429 East Cotati Avenue
Cotati, California 94931

Tel: 707-794-0400
www.illingworthrodkin.com

Fax: 707-794-0405
illro@illingworthrodkin.com

MEMO

Date: April 4, 2019

To: **Amie Ashton**
David J. Powers and Associates
1871 The Alameda, Suite 200
San José, CA 95126

From: **James A. Reyff**
Illingworth & Rodkin, Inc.
429 East Cotati Avenue
Cotati, CA 94931

RE: University Plaza Phase II, Highway 101 Ramp Realignment – East Palo Alto, CA

SUBJECT: **Updated University Plaza Construction Air Quality & Health Risk Assessment**
Job #17-058

This memorandum presents the results of a revised construction-related air pollutants and toxic air containments (TAC) emissions analysis for the University Plaza Phase II and ramp realignment project in East Palo Alto, California. Illingworth & Rodkin, Inc., prepared the technical air quality analysis for the University Plaza Phase II project back in 2017.¹ However, the project has since changed and would include roadway improvements that include construction to realign the U.S. Highway 101 on-ramp at Donohoe Street. This analysis re-evaluates the air quality emissions and health risks that would be associated with the construction of both the University Plaza Phase II and now includes the U.S. 101 on-ramp realignment construction. The analysis was conducted following guidance provided by the Bay Area Air Quality Management District (BAAQMD).² The BAAQMD recommends using a 1,000-foot screening radius around a project site for purposes of identifying community health risk from siting a new source of TACs

Project Description

The project site is located at 2111 University Avenue on an approximate 2.5-acre site in East Palo Alto. The University Avenue site frontage is currently developed with retail and office uses. The project would demolish the existing buildings on site and construct an eight-story structure with approximately 233,840 square feet (sf) of office space and a six-story, 279,995-sf parking structure

¹ Illingworth & Rodkin, Inc., 2017. *University Plaza Phase II Draft Air Quality Assessment*. September.

² Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017.

with 772 parking spaces. In addition, the project proposes to relocate and realign the northbound U.S. Highway 101 on-ramp at Donohoe Street to align with the project driveway and signalization of this intersection and to modify the signalization of the Euclid Avenue/East Bayshore Road/Donohoe Street intersection. Construction of both projects would occur simultaneously.

Community Risk Air Quality Impacts

The average daily construction exhaust emissions were updated to include construction emissions from the University Plaza Phase II project and the ramp realignment project. The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to predict emissions for the University Plaza Project, while the Sacramento Metropolitan Air Quality Management District Road Construction Emissions Model (RCEM), version 9.0.0, April 2018, was used to predict construction emissions from the roadway on-ramp project. The BAAQMD recommends the use of RCEM to analyze construction emissions for transportation projects.

CalEEMod

The same land use inputs that were used in the 2017 technical air quality report were used in this update. The land uses included 233,840 sf entered as “General Office Building,” and 772 spaces entered as “Unenclosed Parking with Elevator” on a 2.58-acre site. In addition, 2,500 cubic yards (cy) soil export is anticipated during the grading and excavation phase, and 12,000-sf of building demolition and 600 tons of paving demolition are expected. 28,000 cy of cement is expected during the building construction phase and 400-cy of asphalt is expected during the paving phase. These inputs were based on information provided by the project applicant. The only change was shifting the construction schedule with the start date beginning in March 2020. Based on the provided construction schedule, there would be 274 construction workdays.

RCEM

The RCEM model provides the total air quality emissions for construction. A construction build-out scenario, including equipment list and schedule, was based on information provided by the project applicant. The project length and project area were estimated as 0.15 miles and 0.85-acres, respectively, using Google Earth. The soil hauling volumes, which were based on provided information, included 114,000-sf of demolition, 18,140-cy of soil exported during grading, 80-cy of concrete delivered during trenching, and 130-cy of asphalted hauled during paving. Based on the provided construction schedule, this project would last approximately 3 months and have a total of 58 construction workdays.

Construction Period Emissions

Both the CalEEMod and RCEM model predict emissions of ozone precursor pollutants (i.e., ROG and NO_x) and particulate matter (i.e., PM₁₀ and PM_{2.5}). The project (includes both the University Plaza Phase II and ramp re-alignment) would be built out over a period of approximately 12 to 13 months where construction was assumed to begin in 2020, or an estimated 274 construction workdays (based on construction information provided).

The air quality emissions would be associated with demolition of the existing uses at the site and

construction of the new infrastructure. Table 1 shows average daily construction emissions of reactive organic gases (ROG), nitrogen oxides (NO_x), particulate matter with aerodynamic diameter of less than 10 micrometers (PM₁₀), and smaller particulate matter less than 2.5 micrometers in diameter (PM_{2.5}) during construction of the project. Average daily emissions were computed by dividing the total construction emissions by the number of construction days. As indicated in Table 1, construction period emissions would not exceed the BAAQMD significance thresholds. *Attachment 1* includes the construction assumptions (schedule and equipment), CalEEMod model outputs, and RCEM model output for construction emissions.

Table 1. Updated Construction Period Emissions

Scenario	ROG	NO _x	PM ₁₀ Exhaust	PM _{2.5} Exhaust
Total construction emissions (tons)	1.49 tons	2.59 tons	0.06 tons	0.05 tons
Average daily emissions (pounds)	10.9 lbs./day	18.9 lbs./day	0.4 lbs./day	0.4 lbs./day
2017 Average daily emissions (pounds)	11.5 lbs./day	18.4 lbs./day	0.4 lbs./day	0.3 lbs./day
<i>BAAQMD Thresholds (pounds per day)</i>	54 lbs./day	54 lbs./day	82 lbs./day	54 lbs./day
Notes: Assumes 274 workdays				

Construction Health Risk Assessment

An updated construction health risk assessment was prepared to address the combined project construction impacts from the University Plaza Phase II and on-ramp upon the surrounding off-site sensitive receptors. Community risk impacts are addressed by predicting increased lifetime cancer risk, the increase in annual PM_{2.5} concentrations, and computing the Hazard Index (HI) for non-cancer health risks. The methodology for computing community risks impacts is contained in *Attachment 2*.

The CalEEMod and RCEM model provided total uncontrolled annual PM₁₀ exhaust emissions (assumed to be DPM) for the off-road construction equipment and for exhaust emissions from on-road vehicles, with total emissions from all construction stages of 0.0534 tons (107 pounds). The on-road emissions are a result of haul truck travel during demolition and grading activities, worker travel, and vendor deliveries during construction. A trip length of one-half mile was used to represent vehicle travel while at or near the construction site. It was assumed that these emissions from on-road vehicles traveling at or near the site would occur at the construction site. Fugitive PM_{2.5} dust emissions were calculated by CalEEMod as 0.0503 tons (101 pounds) for the overall construction period.

Dispersion Modeling

The U.S. EPA AERMOD dispersion model was used to predict concentrations of DPM and PM_{2.5} at sensitive receptors (residences) in the vicinity of the project construction area. The AERMOD dispersion model is a BAAQMD-recommended model for use in modeling analysis of these types of emission activities for CEQA projects.³ For each of the construction sites modeled, the modeling utilized six area sources to represent the on-site construction emissions, three for exhaust emissions

³ Bay Area Air Quality Management District (BAAQMD), 2012, *Recommended Methods for Screening and Modeling Local Risks and Hazards, Version 3.0*. May.

and three for fugitive dust emissions. To represent the construction equipment exhaust emissions, an emission release height of 6 meters (19.7 feet) was used for the area sources. The elevated source height reflects the height of the equipment exhaust pipes plus an additional distance for the height of the exhaust plume above the exhaust pipes to account for plume rise of the exhaust gases. For modeling fugitive PM_{2.5} emissions, a near-ground level release height of 2 meters (6.6 feet) was used for the area sources. Emissions from the construction equipment and on-road vehicle travel were distributed throughout the modeled area sources. Construction emissions were modeled as occurring daily between 7 a.m. to 4 p.m., when a majority of construction would occur.

The modeling used a five-year data set (2006 - 2010) of hourly meteorological data from the Palo Alto Airport that was prepared for use with the AERMOD model by the CARB. Annual DPM and PM_{2.5} concentrations from construction activities during the 2020 to 2021 period were calculated using the model. DPM and PM_{2.5} concentrations were calculated at nearby sensitive receptors. Receptor heights of 1.5 meters (4.9 feet) and 4.5 meters (14.8 feet) were used to represent the breathing heights of residents.

Predicted Construction Risk Impacts

The maximum-modeled annual DPM and PM_{2.5} concentrations, which includes both the DPM and fugitive PM_{2.5} concentrations, were identified at nearby sensitive receptors (as shown in Figure 1) to find the maximally exposed individuals (MEIs). The maximum increased cancer risks were calculated using BAAQMD recommended methods and exposure parameters described in *Attachment 2*. Non-cancer health hazards and maximum PM_{2.5} concentrations were also calculated and identified. *Attachment 3* to this report includes the emission calculations used for the construction area source modeling and the cancer risk calculations.

Results of this assessment indicated that the residential Construction MEI was located on the first-floor (1.5-meter breathing height) of an apartment complex south of the construction site as seen in Figure 1. This Construction MEI is the same MEI identified in the 2017 report. The maximum increased residential cancer risk (assuming third trimester and infant exposure) would exceed the BAAQMD single-source threshold of greater than 10.0 per million. The maximum PM_{2.5} concentration and HI would not exceed the BAAQMD single-source threshold of greater than 0.3 µg/m³ for PM_{2.5} concentrations nor the threshold of greater than 1.0 for HI.

Predicted Operational Risk Impacts

Operation of the project is not expected to cause any localized emissions that could expose existing sensitive receptors to unhealthy air pollutant levels. When operating, the project may generate automobile traffic and infrequent truck traffic. No stationary sources of TACs, such as generators, are proposed as part of the project.

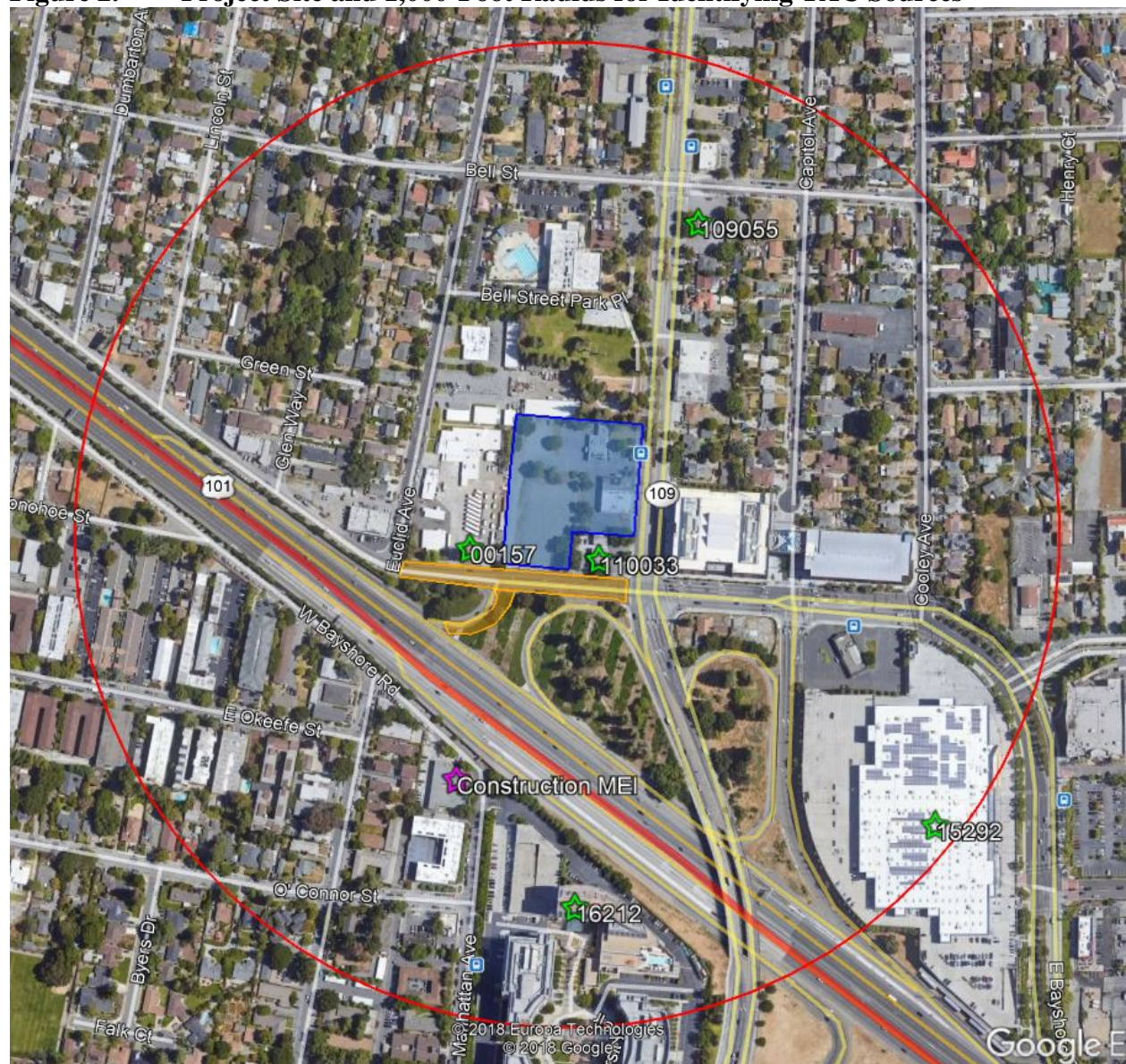
Figure 1. Project Construction Site and Locations of Off-Site Sensitive Receptors and TAC Impacts



Cumulative Community Health Risk Impacts

Community health risk assessments typically look at all substantial sources of TACs located within 1,000 feet of project sites. These sources include highways, busy surface streets, and stationary sources identified by BAAQMD. Highway 101, University Avenue, and Donohoe Street are all roadways that were identified as having average daily traffic (ADT) of over 10,000 vehicles and are considered sources of TACs. Traffic on other nearby streets are considered to have ADTs less than 10,000 vehicles. A review of BAAQMD's stationary source Google Earth map tool identified five sources with the potential to affect the Construction MEI. Figure 2 shows the sources affecting the project site. Details of the modeling and community risk calculations are included in *Attachment 4*.

Figure 2. Project Site and 1,000-Foot Radius for Identifying TAC Sources



Highways – U.S. Route 101

BAAQMD provides a Google Earth *Highway Screening Analysis Tool* that can be used to identify screening level impacts from State highways. U.S. 101 (i.e. Link 251, 6ft) risk impacts were screened using the BAAQMD *Highway Screening Analysis Tool*. The lifetime cancer risk, annual PM_{2.5} exposure and non-cancer hazard index corresponding to the distance between the project and the site was used. The data was based on the Construction MEI being 100 feet south of the highway. The predicted cancer risk was then adjusted using a factor of 1.3744 to account for new OEHHA guidance. The risk levels are listed in Table 3.

Local Roadways – Donohoe Street and University Avenue

For local roadways, BAAQMD has provided the *Roadway Screening Analysis Calculator* to assess whether roadways with traffic volumes of over 10,000 vehicles per day may have a potentially significant effect on a proposed project. Two adjustments were made to the cancer risk predictions made by this calculator: (1) adjustment for latest vehicle emissions rates predicted using EMFAC2014 and (2) adjustment of cancer risk to reflect new Office of Environmental Health Hazard Assessment (OEHHA) guidance (see *Attachment 1*).

The calculator uses EMFAC2011 emission rates for the year 2014. In addition, a new version of the emissions factor model, EMFAC2014 is available. This version predicts lower emission rates. An adjustment factor of 0.5 was developed by comparing emission rates of total organic gases (TOG) for running exhaust and running losses developed using EMFAC2011 for year 2014 and those from EMFAC2014 for 2018. The predicted cancer risk was then adjusted using a factor of 1.3744 to account for new OEHHA guidance. This factor was provided by BAAQMD for use with their CEQA screening tools that are used to predict cancer risk.

University Avenue was identified an ADT of 44,865 vehicles and Donohoe Street had an ADT of 30,210 vehicles). This estimate was based on the peak-hour traffic volumes included in the project's traffic analysis for background plus project conditions.⁴ The AM and PM peak-hour volumes were averaged and then multiplied by 10 to estimate the ADT.

The BAAQMD *Roadway Screening Analysis Calculator* for San Mateo County was used for the roadway. University Avenue was identified as a north-south roadway with the Construction MEI west of the roadway. Donohoe Street was identified as an east-west roadway with the Construction MEI south of the roadway. Estimated risk values for both roadways are listed in Table 4. Note that BAAQMD has found that non-cancer hazards from all local roadways would be below 0.03.

Stationary Sources

Permitted stationary sources of air pollution near the project site were identified using BAAQMD's *Stationary Source Risk & Hazard Analysis Tool*. This mapping tool uses Google Earth and identified the location of five stationary sources and their estimated risk and hazard impacts. The risk values adjusted with the appropriate distance multiplier values provided by BAAQMD.

⁴ Hexagon Transportation Consultants, Inc., 2017. *Traffic Analysis Assumption for East Palo Alto Development Projects Memorandum*. March.

Five stationary sources were identified with three being gas dispensing facilities and the remaining two being generator sources. The screening risk levels for these stationary sources were provided by BAAQMD and then adjusted for distance based on BAAQMD's *Distance Adjustment Multiplier Tool for Diesel Internal Combustion Engines or Distance Adjustment Multiplier Tool for Gasoline Dispensing Facilities (GDF)* when appropriate. Concentrations and community risk impact from these sources upon the Construction MEI are reported in Table 3.

Cumulative Community Health Risk at Construction MEI

Table 3 reports both the project and cumulative community risk impacts at the sensitive receptor most affected by construction (i.e. the construction MEI). Without mitigation, the project would have a *significant* impact with respect to community risk caused by project construction activities, since the maximum cancer risk does exceed their single-source thresholds. Implementing *Mitigation Measures AQ-1 and AQ-2* would reduce the construction impacts to *less-than-significant*. The combined annual cancer risk, PM_{2.5} concentration, and Hazard risk values, which includes unmitigated and mitigated, would not exceed the cumulative threshold. Therefore, the project would have a *less-than-significant* impact regarding the cumulative risk within the area.

Table 3. Community Risk Impact at Construction MEI

Source	Cancer Risk (per million)	Annual PM _{2.5} (µg/m ³)	Hazard Index
Project Construction	11.5 (infant)	0.09	0.01
<i>BAAQMD Single-Source Threshold</i>	<i>>10.0</i>	<i>>0.3</i>	<i>>0.1</i>
<i>Significant?</i>	<i>Yes</i>	<i>No</i>	<i>No</i>
Highway 101 (Link 251) – MEI at 100-ft south	49.1	0.33	0.04
University Avenue (ADT 44,865) – MEI at 650-ft west	1.3	0.04	<0.03
Donohoe Street (ADT 30,210) – MEI at 500-ft south	2.0	0.07	<0.03
East Palo Alto Shell, Gas Dispensing Facility Plant #109055 – MEI at >1,000-ft	0.3	-	<0.01
Chevron, Gas Dispensing Facility Plant #110033 – MEI at 660-ft	2.7	-	0.01
Ravenswood City School District, Gas Dispensing Facility Plant #100157 – MEI at 590-ft	0.4	-	<0.01
IKEA, Generator Source Plant #15292 – MEI at >1,000-ft	4.5	0.01	<0.01
Four Seasons Hotel, Generator Source Plant #16212 – MEI at 400-ft	0.5	<0.01	<0.01
Cumulative Total	72.3	0.55	<0.16
<i>BAAQMD Cumulative Source Threshold</i>	<i>>100</i>	<i>>0.8</i>	<i>>10.0</i>
<i>Significant?</i>	<i>No</i>	<i>No</i>	<i>No</i>

Mitigation Measure AQ-1: Include measures to control dust and exhaust during construction.

During any construction period ground disturbance, the applicant shall ensure that the project contractor implement measures to control dust and exhaust. Implementation of the measures recommended by BAAQMD and listed below would reduce the air quality impacts associated with grading and new construction to a less-than-significant level. Additional measures are identified to reduce construction equipment exhaust emissions. The contractor shall implement the following best management practices that are required of all projects:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Effectiveness of Mitigation Measure AQ-1

The measures above are consistent with BAAQMD-recommended basic control measures for reducing fugitive particulate matter that are contained in the BAAQMD CEQA Air Quality Guidelines.

Mitigation Measure AQ-1: Selection of equipment during construction to minimize emissions. Such equipment selection would include the following:

The project shall develop a plan demonstrating that the off-road equipment used onsite to construct the project would achieve a fleet-wide average 18-percent reduction in DPM exhaust emissions or greater. One feasible plan to achieve this reduction would include the following:

1. All diesel-powered off-road equipment, larger than 25 horsepower, operating on the site for more than two days continuously shall, at a minimum, meet U.S. EPA particulate matter emission standards for Tier 3 engines. Equipment that meets U.S. EPA Tier 4 standards for particulate matter or use of equipment that is electrically powered or uses non-diesel fuels would also meet this requirement.
2. All portable equipment shall meet the U.S. EPA particulate matter emission standards for Tier 4 Interim. This equipment includes air compressors and welders.
3. Provide line power (electricity) to the project site during the early phases of construction to minimize use of diesel-powered portable equipment such as generators and compressors.

Effectiveness of Mitigation Measure AQ-1

The combined use of equipment with Tier 3 and Tier 4 engines would have an overall reduction of 18-percent. In addition, use of BAAQMD-recommended best management practices would reduce emissions by an additional 5 percent. With mitigation, the computed maximum increased lifetime residential cancer risk from construction, assuming infant exposure, would be 9 per million or less, the maximum annual PM_{2.5} concentration would be <0.09 µg/m³, and the Hazard Index would be <0.01. As a result, impacts would be reduced to *less-than-significant* with respect to community risk caused by construction activities.

Attachment 1: CalEEMod Model Output, RCEM Output and Construction Activity Assumptions

Project Name:

University Plaza Phase II @ 2111 University Avenue

Note: Provided Construction Sheet from 2017. Equipment list and usage were kept the same. Hauling and truck trips were also the same. The given calendar dates were shifted for a Spring 2020 start date as explained in the memo.

Qty	Description	HP	Load Factor	Hours/day	Total Work Days	Avg Hours	Annual Hours	Comments
Demolition		Start Date:	3/1/2018	Total phase:	20			
		End Date:	3/28/2018					
Demolition Volume								
1	Excavators	158	0.3819	8	10	4.0	80	Square footage of buildings to be demolished
1	Rubber-Tired Dozers	247	0.3953	8	5	2.0	40	(or total tons to be hauled)
								<u>12,000</u> square feet or
								<u>?</u> Hauling volume (tons)
Site Preparation		Start Date:	3/29/2018	Total phase:	10			Any pavement demolished and hauled? <u>600 tons</u>
		End Date:	4/11/2018					
2	Tractors/Loaders/Backhoes	97	0.3685	8	10	8.0	160	
Grading / Excavation		Start Date:	4/3/2018	Total phase:	10			
		End Date:	4/16/2018					
Soil Hauling Volume								
1	Excavators	158	0.3819	8	5	4.0	40	Export volume = <u>2,500</u> cubic yards?
1	Graders	187	0.4087	8	8	6.4	64	Import volume = <u>?</u> cubic yards?
1	Plate Compactors	8	0.43	8	10	8.0	80	
Trenching		Start Date:		Total phase:	19			
		End Date:						
2	Excavators	158	0.3819	8	7	2.9	112	
2	Tractors/Loaders/Backhoes	97	0.3685	8	19	8.0	304	
Building - Exterior		Start Date:	4/11/2018	Total phase:	220			Cement Trucks? cement <u>28,000</u> cy
		End Date:	2/12/2019					or <u>?</u> Total Round-Trips
1	Cranes	231	0.2881	8	80	2.9	640	Electric? (Y/N) <u>?</u> Otherwise assumed diesel
2	Welders	46	0.45	8	80	2.9	1280	
2	Aerial Lifts (i.e JLG)	63	0.31	8	80	2.9	1280	
Building - Interior/Architectural Coating		Start Date:	2/13/2019	Total phase:	25			
		End Date:	3/19/2019					
1	Air Compressors	78	0.48	6	15	3.6	90	
2	Aerial Lift	63	0.31	6	25	6.0	300	
Paving		Start Date:	2/27/2019	Total phase:	10			
		Start Date:	3/12/2019					
1	Pavers	130	0.4154	8	1	0.8	8	
1	Paving Equipment	132	0.3551	8	1	0.8	8	Asphalt? <u>400</u> cy or _____ round trips
1	Rollers	80	0.3752	8	1	0.8	8	
1	Tractors/Loaders/Backhoes	97	0.3685	8	1	0.8	8	

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	233.84	1000sqft	2.58	233,840.00	0
Unenclosed Parking with Elevator	772.00	Space	0.00	279,995.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	70
Climate Zone	5			Operational Year	2022
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MW hr)	290	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

1.3 User Entered Comments & Non-Default Data

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Project Characteristics - PG&E 2020 290 rate

Land Use - Land use and acreage from PD and plan set

Construction Phase - Anticipated phasing schedule from default values and input from applicant

Off-road Equipment - Proposed equipment list from applicant

Off-road Equipment - Proposed equipment list from applicant

Off-road Equipment - Proposed equipment list from applicant

Off-road Equipment - Proposed equipment list from applicant

Off-road Equipment - Proposed equipment list from applicant

Off-road Equipment - Proposed equipment list from applicant

Off-road Equipment - Proposed equipment list from applicant

Trips and VMT - Demo: 55 bldg demo trips + 60 pavement demo trips (600 tons @ 20tons/truck) = 115. Bldg: 28,000cy cement @ 16cy/truck = 3,500 trips.

Paving: 400cy asphlat = 50 trips. Vendor trip length for cement and asphalt.

Demolition - 12,000sf bldg demo

Grading - 2,500cy soil export

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	6.00	10.00
tblConstructionPhase	NumDays	10.00	25.00
tblConstructionPhase	NumDays	3.00	10.00
tblConstructionPhase	PhaseEndDate	4/9/2020	4/15/2020
tblConstructionPhase	PhaseEndDate	2/25/2021	3/18/2021
tblConstructionPhase	PhaseEndDate	4/1/2020	4/10/2020
tblConstructionPhase	PhaseEndDate	4/9/2020	5/6/2020
tblEnergyUse	LightingElect	3.58	3.67
tblEnergyUse	LightingElect	1.75	2.63
tblEnergyUse	T24E	4.10	4.30
tblEnergyUse	T24NG	18.32	18.41
tblGrading	MaterialExported	0.00	2,500.00

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tblLandUse	LandUseSquareFeet	308,800.00	279,995.00
tblLandUse	LotAcreage	5.37	2.58
tblLandUse	LotAcreage	6.95	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	UsageHours	6.00	3.60
tblOffRoadEquipment	UsageHours	8.00	2.90
tblOffRoadEquipment	UsageHours	8.00	6.40
tblOffRoadEquipment	UsageHours	8.00	0.80
tblOffRoadEquipment	UsageHours	8.00	0.80
tblOffRoadEquipment	UsageHours	8.00	0.80
tblOffRoadEquipment	UsageHours	8.00	2.00
tblOffRoadEquipment	UsageHours	8.00	0.80
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	8.00	2.90
tblProjectCharacteristics	CO2IntensityFactor	641.35	290

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tblTripsAndVMT	HaulingTripLength	20.00	7.30
tblTripsAndVMT	HaulingTripLength	20.00	7.30
tblTripsAndVMT	HaulingTripNumber	55.00	115.00
tblTripsAndVMT	HaulingTripNumber	313.00	312.00
tblTripsAndVMT	HaulingTripNumber	0.00	3,500.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00

2.0 Emissions Summary

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	3-2-2020	6-1-2020	0.5640	0.5640
2	6-2-2020	9-1-2020	0.5761	0.5761
3	9-2-2020	12-1-2020	0.5771	0.5771
4	12-2-2020	3-1-2021	0.8112	0.8112
5	3-2-2021	6-1-2021	0.9283	0.9283
		Highest	0.9283	0.9283

2.2 Overall Operational

Unmitigated Operational

	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/yr					
Area	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192
Energy	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	738.9996	738.9996	0.0543	0.0147	744.7435
Mobile	0.4616	1.4215	5.2653	0.0184	1.7362	0.0155	1.7517	0.4666	0.0144	0.4810	0.0000	1,686.3120	1,686.3120	0.0607	0.0000	1,687.8302
Waste						0.0000	0.0000		0.0000	0.0000	44.1444	0.0000	44.1444	2.6089	0.0000	109.3660
Water						0.0000	0.0000		0.0000	0.0000	13.1855	41.3099	54.4953	1.3584	0.0328	98.2394
Total	1.5461	1.6441	5.4615	0.0198	1.7362	0.0324	1.7686	0.4666	0.0314	0.4980	57.3299	2,466.6395	2,523.9694	4.0824	0.0476	2,640.1983

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2.2 Overall Operational

Mitigated Operational

	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/yr					
Area	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192
Energy	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	738.9996	738.9996	0.0543	0.0147	744.7435
Mobile	0.4616	1.4215	5.2653	0.0184	1.7362	0.0155	1.7517	0.4666	0.0144	0.4810	0.0000	1,686.3120	1,686.3120	0.0607	0.0000	1,687.8302
Waste						0.0000	0.0000		0.0000	0.0000	44.1444	0.0000	44.1444	2.6089	0.0000	109.3660
Water						0.0000	0.0000		0.0000	0.0000	13.1855	41.3099	54.4953	1.3584	0.0328	98.2394
Total	1.5461	1.6441	5.4615	0.0198	1.7362	0.0324	1.7686	0.4666	0.0314	0.4980	57.3299	2,466.6395	2,523.9694	4.0824	0.0476	2,640.1983

	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
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/2/2020	3/27/2020	5	20	
2	Site Preparation	Site Preparation	3/28/2020	4/10/2020	5	10	
3	Grading	Grading	4/2/2020	4/15/2020	5	10	
4	Trenching	Trenching	4/10/2020	5/6/2020	5	19	
5	Building Construction	Building Construction	4/10/2020	2/11/2021	5	220	
6	Paving	Paving	2/12/2021	3/18/2021	5	25	
7	Architectural Coating	Architectural Coating	2/26/2021	3/11/2021	5	10	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 4

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 350,760; Non-Residential Outdoor: 116,920; Striped Parking Area: 16,800 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Excavators	1	4.00	158	0.38
Demolition	Rubber Tired Dozers	1	2.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Site Preparation	Graders	0	8.00	187	0.41
Site Preparation	Scrapers	0	8.00	367	0.48
Site Preparation	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Grading	Excavators	1	4.00	158	0.38
Grading	Graders	1	6.40	187	0.41

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Grading	Plate Compactors	1	8.00	8	0.43
Grading	Rubber Tired Dozers	0	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	0	7.00	97	0.37
Trenching	Excavators	2	2.90	158	0.38
Trenching	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Aerial Lifts	2	2.90	63	0.31
Building Construction	Cranes	1	2.90	231	0.29
Building Construction	Forklifts	0	7.00	89	0.20
Building Construction	Generator Sets	0	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	0	6.00	97	0.37
Building Construction	Welders	2	2.90	46	0.45
Architectural Coating	Aerial Lifts	2	6.00	63	0.31
Architectural Coating	Air Compressors	1	3.60	78	0.48
Paving	Cement and Mortar Mixers	0	8.00	9	0.56
Paving	Pavers	1	0.80	130	0.42
Paving	Paving Equipment	1	0.80	132	0.36
Paving	Rollers	1	0.80	80	0.38
Paving	Tractors/Loaders/Backhoes	1	0.80	97	0.37

Trips and VMT

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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	2	5.00	0.00	115.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	312.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Trenching	4	10.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	192.00	84.00	3,500.00	10.80	7.30	7.30	LD_Mix	HDT_Mix	HHDT
Architectural Coating	3	38.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	4	10.00	0.00	50.00	10.80	7.30	7.30	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Demolition - 2020

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/yr					
Fugitive Dust					5.9100e-003	0.0000	5.9100e-003	8.9000e-004	0.0000	8.9000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.9200e-003	0.0404	0.0267	5.0000e-005		1.9700e-003	1.9700e-003		1.8100e-003	1.8100e-003	0.0000	4.1449	4.1449	1.3400e-003	0.0000	4.1784
Total	3.9200e-003	0.0404	0.0267	5.0000e-005	5.9100e-003	1.9700e-003	7.8800e-003	8.9000e-004	1.8100e-003	2.7000e-003	0.0000	4.1449	4.1449	1.3400e-003	0.0000	4.1784

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3.2 Demolition - 2020

Unmitigated 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/yr										MT/yr					
Hauling	5.1000e-004	0.0186	7.7400e-003	5.0000e-005	9.6000e-004	6.0000e-005	1.0200e-003	2.6000e-004	6.0000e-005	3.2000e-004	0.0000	4.8031	4.8031	6.0000e-004	0.0000	4.8180
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	1.4000e-004	9.0000e-005	9.7000e-004	0.0000	3.9000e-004	0.0000	4.0000e-004	1.0000e-004	0.0000	1.1000e-004	0.0000	0.3278	0.3278	1.0000e-005	0.0000	0.3279
Total	6.5000e-004	0.0187	8.7100e-003	5.0000e-005	1.3500e-003	6.0000e-005	1.4200e-003	3.6000e-004	6.0000e-005	4.3000e-004	0.0000	5.1308	5.1308	6.1000e-004	0.0000	5.1460

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/yr					
Fugitive Dust					5.9100e-003	0.0000	5.9100e-003	8.9000e-004	0.0000	8.9000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.9200e-003	0.0404	0.0267	5.0000e-005		1.9700e-003	1.9700e-003		1.8100e-003	1.8100e-003	0.0000	4.1449	4.1449	1.3400e-003	0.0000	4.1784
Total	3.9200e-003	0.0404	0.0267	5.0000e-005	5.9100e-003	1.9700e-003	7.8800e-003	8.9000e-004	1.8100e-003	2.7000e-003	0.0000	4.1449	4.1449	1.3400e-003	0.0000	4.1784

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3.2 Demolition - 2020

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/yr										MT/yr					
Hauling	5.1000e-004	0.0186	7.7400e-003	5.0000e-005	9.6000e-004	6.0000e-005	1.0200e-003	2.6000e-004	6.0000e-005	3.2000e-004	0.0000	4.8031	4.8031	6.0000e-004	0.0000	4.8180
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	1.4000e-004	9.0000e-005	9.7000e-004	0.0000	3.9000e-004	0.0000	4.0000e-004	1.0000e-004	0.0000	1.1000e-004	0.0000	0.3278	0.3278	1.0000e-005	0.0000	0.3279
Total	6.5000e-004	0.0187	8.7100e-003	5.0000e-005	1.3500e-003	6.0000e-005	1.4200e-003	3.6000e-004	6.0000e-005	4.3000e-004	0.0000	5.1308	5.1308	6.1000e-004	0.0000	5.1460

3.3 Site Preparation - 2020

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/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.1000e-003	0.0211	0.0228	3.0000e-005		1.3300e-003	1.3300e-003		1.2200e-003	1.2200e-003	0.0000	2.7285	2.7285	8.8000e-004	0.0000	2.7506
Total	2.1000e-003	0.0211	0.0228	3.0000e-005	0.0000	1.3300e-003	1.3300e-003	0.0000	1.2200e-003	1.2200e-003	0.0000	2.7285	2.7285	8.8000e-004	0.0000	2.7506

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3.3 Site Preparation - 2020

Unmitigated 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/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	7.0000e-005	5.0000e-005	4.9000e-004	0.0000	2.0000e-004	0.0000	2.0000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1639	0.1639	0.0000	0.0000	0.1640
Total	7.0000e-005	5.0000e-005	4.9000e-004	0.0000	2.0000e-004	0.0000	2.0000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1639	0.1639	0.0000	0.0000	0.1640

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/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.1000e-003	0.0211	0.0228	3.0000e-005		1.3300e-003	1.3300e-003		1.2200e-003	1.2200e-003	0.0000	2.7285	2.7285	8.8000e-004	0.0000	2.7506
Total	2.1000e-003	0.0211	0.0228	3.0000e-005	0.0000	1.3300e-003	1.3300e-003	0.0000	1.2200e-003	1.2200e-003	0.0000	2.7285	2.7285	8.8000e-004	0.0000	2.7506

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3.3 Site Preparation - 2020

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/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	7.0000e-005	5.0000e-005	4.9000e-004	0.0000	2.0000e-004	0.0000	2.0000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1639	0.1639	0.0000	0.0000	0.1640
Total	7.0000e-005	5.0000e-005	4.9000e-004	0.0000	2.0000e-004	0.0000	2.0000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1639	0.1639	0.0000	0.0000	0.1640

3.4 Grading - 2020

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/yr					
Fugitive Dust					2.2600e-003	0.0000	2.2600e-003	2.5000e-004	0.0000	2.5000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.7200e-003	0.0326	0.0165	4.0000e-005		1.1500e-003	1.1500e-003		1.0600e-003	1.0600e-003	0.0000	3.6229	3.6229	1.1400e-003	0.0000	3.6513
Total	2.7200e-003	0.0326	0.0165	4.0000e-005	2.2600e-003	1.1500e-003	3.4100e-003	2.5000e-004	1.0600e-003	1.3100e-003	0.0000	3.6229	3.6229	1.1400e-003	0.0000	3.6513

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3.4 Grading - 2020

Unmitigated 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/yr										MT/yr					
Hauling	1.3800e-003	0.0503	0.0210	1.3000e-004	2.6100e-003	1.6000e-004	2.7700e-003	7.2000e-004	1.5000e-004	8.7000e-004	0.0000	13.0309	13.0309	1.6300e-003	0.0000	13.0716
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	1.1000e-004	7.0000e-005	7.8000e-004	0.0000	3.1000e-004	0.0000	3.2000e-004	8.0000e-005	0.0000	9.0000e-005	0.0000	0.2622	0.2622	1.0000e-005	0.0000	0.2623
Total	1.4900e-003	0.0504	0.0218	1.3000e-004	2.9200e-003	1.6000e-004	3.0900e-003	8.0000e-004	1.5000e-004	9.6000e-004	0.0000	13.2931	13.2931	1.6400e-003	0.0000	13.3339

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/yr					
Fugitive Dust					2.2600e-003	0.0000	2.2600e-003	2.5000e-004	0.0000	2.5000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.7200e-003	0.0326	0.0165	4.0000e-005		1.1500e-003	1.1500e-003		1.0600e-003	1.0600e-003	0.0000	3.6229	3.6229	1.1400e-003	0.0000	3.6513
Total	2.7200e-003	0.0326	0.0165	4.0000e-005	2.2600e-003	1.1500e-003	3.4100e-003	2.5000e-004	1.0600e-003	1.3100e-003	0.0000	3.6229	3.6229	1.1400e-003	0.0000	3.6513

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3.4 Grading - 2020

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/yr										MT/yr					
Hauling	1.3800e-003	0.0503	0.0210	1.3000e-004	2.6100e-003	1.6000e-004	2.7700e-003	7.2000e-004	1.5000e-004	8.7000e-004	0.0000	13.0309	13.0309	1.6300e-003	0.0000	13.0716
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	1.1000e-004	7.0000e-005	7.8000e-004	0.0000	3.1000e-004	0.0000	3.2000e-004	8.0000e-005	0.0000	9.0000e-005	0.0000	0.2622	0.2622	1.0000e-005	0.0000	0.2623
Total	1.4900e-003	0.0504	0.0218	1.3000e-004	2.9200e-003	1.6000e-004	3.0900e-003	8.0000e-004	1.5000e-004	9.6000e-004	0.0000	13.2931	13.2931	1.6400e-003	0.0000	13.3339

3.5 Trenching - 2020

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/yr					
Off-Road	5.6700e-003	0.0566	0.0658	9.0000e-005		3.3300e-003	3.3300e-003		3.0700e-003	3.0700e-003	0.0000	8.3091	8.3091	2.6900e-003	0.0000	8.3762
Total	5.6700e-003	0.0566	0.0658	9.0000e-005		3.3300e-003	3.3300e-003		3.0700e-003	3.0700e-003	0.0000	8.3091	8.3091	2.6900e-003	0.0000	8.3762

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3.5 Trenching - 2020

Unmitigated 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/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	2.6000e-004	1.8000e-004	1.8500e-003	1.0000e-005	7.5000e-004	0.0000	7.5000e-004	2.0000e-004	0.0000	2.0000e-004	0.0000	0.6228	0.6228	1.0000e-005	0.0000	0.6231
Total	2.6000e-004	1.8000e-004	1.8500e-003	1.0000e-005	7.5000e-004	0.0000	7.5000e-004	2.0000e-004	0.0000	2.0000e-004	0.0000	0.6228	0.6228	1.0000e-005	0.0000	0.6231

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/yr					
Off-Road	5.6700e-003	0.0566	0.0658	9.0000e-005		3.3300e-003	3.3300e-003		3.0700e-003	3.0700e-003	0.0000	8.3091	8.3091	2.6900e-003	0.0000	8.3762
Total	5.6700e-003	0.0566	0.0658	9.0000e-005		3.3300e-003	3.3300e-003		3.0700e-003	3.0700e-003	0.0000	8.3091	8.3091	2.6900e-003	0.0000	8.3762

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3.5 Trenching - 2020

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/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	2.6000e-004	1.8000e-004	1.8500e-003	1.0000e-005	7.5000e-004	0.0000	7.5000e-004	2.0000e-004	0.0000	2.0000e-004	0.0000	0.6228	0.6228	1.0000e-005	0.0000	0.6231
Total	2.6000e-004	1.8000e-004	1.8500e-003	1.0000e-005	7.5000e-004	0.0000	7.5000e-004	2.0000e-004	0.0000	2.0000e-004	0.0000	0.6228	0.6228	1.0000e-005	0.0000	0.6231

3.6 Building Construction - 2020

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/yr					
Off-Road	0.0419	0.3382	0.2699	4.9000e-004		0.0146	0.0146		0.0139	0.0139	0.0000	40.5818	40.5818	0.0109	0.0000	40.8530
Total	0.0419	0.3382	0.2699	4.9000e-004		0.0146	0.0146		0.0139	0.0139	0.0000	40.5818	40.5818	0.0109	0.0000	40.8530

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3.6 Building Construction - 2020

Unmitigated 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/yr										MT/yr					
Hauling	6.5700e-003	0.2606	0.0984	5.1000e-004	0.0103	6.3000e-004	0.0110	2.8100e-003	6.0000e-004	3.4100e-003	0.0000	52.5923	52.5923	6.5200e-003	0.0000	52.7552
Vendor	0.0309	0.9254	0.3684	2.1200e-003	0.0520	4.6100e-003	0.0566	0.0150	4.4100e-003	0.0195	0.0000	211.4651	211.4651	0.0184	0.0000	211.9244
Worker	0.0497	0.0337	0.3550	1.3200e-003	0.1436	9.0000e-004	0.1445	0.0382	8.3000e-004	0.0390	0.0000	119.5685	119.5685	2.3300e-003	0.0000	119.6268
Total	0.0872	1.2197	0.8217	3.9500e-003	0.2059	6.1400e-003	0.2121	0.0561	5.8400e-003	0.0619	0.0000	383.6259	383.6259	0.0272	0.0000	384.3064

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/yr					
Off-Road	0.0419	0.3382	0.2699	4.9000e-004		0.0146	0.0146		0.0139	0.0139	0.0000	40.5818	40.5818	0.0109	0.0000	40.8530
Total	0.0419	0.3382	0.2699	4.9000e-004		0.0146	0.0146		0.0139	0.0139	0.0000	40.5818	40.5818	0.0109	0.0000	40.8530

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3.6 Building Construction - 2020

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/yr										MT/yr					
Hauling	6.5700e-003	0.2606	0.0984	5.1000e-004	0.0103	6.3000e-004	0.0110	2.8100e-003	6.0000e-004	3.4100e-003	0.0000	52.5923	52.5923	6.5200e-003	0.0000	52.7552
Vendor	0.0309	0.9254	0.3684	2.1200e-003	0.0520	4.6100e-003	0.0566	0.0150	4.4100e-003	0.0195	0.0000	211.4651	211.4651	0.0184	0.0000	211.9244
Worker	0.0497	0.0337	0.3550	1.3200e-003	0.1436	9.0000e-004	0.1445	0.0382	8.3000e-004	0.0390	0.0000	119.5685	119.5685	2.3300e-003	0.0000	119.6268
Total	0.0872	1.2197	0.8217	3.9500e-003	0.2059	6.1400e-003	0.2121	0.0561	5.8400e-003	0.0619	0.0000	383.6259	383.6259	0.0272	0.0000	384.3064

3.6 Building Construction - 2021

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/yr					
Off-Road	5.9400e-003	0.0493	0.0414	8.0000e-005		2.0000e-003	2.0000e-003		1.9100e-003	1.9100e-003	0.0000	6.4074	6.4074	1.6800e-003	0.0000	6.4493
Total	5.9400e-003	0.0493	0.0414	8.0000e-005		2.0000e-003	2.0000e-003		1.9100e-003	1.9100e-003	0.0000	6.4074	6.4074	1.6800e-003	0.0000	6.4493

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3.6 Building Construction - 2021

Unmitigated 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/yr										MT/yr					
Hauling	9.9000e-004	0.0384	0.0160	8.0000e-005	8.4000e-003	9.0000e-005	8.4900e-003	2.1100e-003	8.0000e-005	2.1900e-003	0.0000	8.1643	8.1643	1.0300e-003	0.0000	8.1899
Vendor	4.0200e-003	0.1312	0.0563	3.3000e-004	8.2100e-003	3.0000e-004	8.5100e-003	2.3800e-003	2.9000e-004	2.6600e-003	0.0000	32.9746	32.9746	2.8500e-003	0.0000	33.0459
Worker	7.3400e-003	4.7800e-003	0.0518	2.0000e-004	0.0227	1.4000e-004	0.0228	6.0300e-003	1.3000e-004	6.1600e-003	0.0000	18.2077	18.2077	3.3000e-004	0.0000	18.2159
Total	0.0124	0.1744	0.1241	6.1000e-004	0.0393	5.3000e-004	0.0398	0.0105	5.0000e-004	0.0110	0.0000	59.3465	59.3465	4.2100e-003	0.0000	59.4517

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/yr					
Off-Road	5.9400e-003	0.0493	0.0414	8.0000e-005		2.0000e-003	2.0000e-003		1.9100e-003	1.9100e-003	0.0000	6.4074	6.4074	1.6800e-003	0.0000	6.4493
Total	5.9400e-003	0.0493	0.0414	8.0000e-005		2.0000e-003	2.0000e-003		1.9100e-003	1.9100e-003	0.0000	6.4074	6.4074	1.6800e-003	0.0000	6.4493

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3.6 Building Construction - 2021

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/yr										MT/yr					
Hauling	9.9000e-004	0.0384	0.0160	8.0000e-005	8.4000e-003	9.0000e-005	8.4900e-003	2.1100e-003	8.0000e-005	2.1900e-003	0.0000	8.1643	8.1643	1.0300e-003	0.0000	8.1899
Vendor	4.0200e-003	0.1312	0.0563	3.3000e-004	8.2100e-003	3.0000e-004	8.5100e-003	2.3800e-003	2.9000e-004	2.6600e-003	0.0000	32.9746	32.9746	2.8500e-003	0.0000	33.0459
Worker	7.3400e-003	4.7800e-003	0.0518	2.0000e-004	0.0227	1.4000e-004	0.0228	6.0300e-003	1.3000e-004	6.1600e-003	0.0000	18.2077	18.2077	3.3000e-004	0.0000	18.2159
Total	0.0124	0.1744	0.1241	6.1000e-004	0.0393	5.3000e-004	0.0398	0.0105	5.0000e-004	0.0110	0.0000	59.3465	59.3465	4.2100e-003	0.0000	59.4517

3.7 Paving - 2021

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/yr					
Off-Road	1.0200e-003	0.0104	0.0120	2.0000e-005		5.6000e-004	5.6000e-004		5.2000e-004	5.2000e-004	0.0000	1.5927	1.5927	5.2000e-004	0.0000	1.6056
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.0200e-003	0.0104	0.0120	2.0000e-005		5.6000e-004	5.6000e-004		5.2000e-004	5.2000e-004	0.0000	1.5927	1.5927	5.2000e-004	0.0000	1.6056

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3.7 Paving - 2021

Unmitigated 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/yr										MT/yr					
Hauling	1.0000e-004	4.0200e-003	1.6800e-003	1.0000e-005	1.5000e-004	1.0000e-005	1.6000e-004	4.0000e-005	1.0000e-005	5.0000e-005	0.0000	0.8553	0.8553	1.1000e-004	0.0000	0.8580
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	3.2000e-004	2.1000e-004	2.2500e-003	1.0000e-005	9.8000e-004	1.0000e-005	9.9000e-004	2.6000e-004	1.0000e-005	2.7000e-004	0.0000	0.7903	0.7903	1.0000e-005	0.0000	0.7906
Total	4.2000e-004	4.2300e-003	3.9300e-003	2.0000e-005	1.1300e-003	2.0000e-005	1.1500e-003	3.0000e-004	2.0000e-005	3.2000e-004	0.0000	1.6456	1.6456	1.2000e-004	0.0000	1.6486

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/yr					
Off-Road	1.0200e-003	0.0104	0.0120	2.0000e-005		5.6000e-004	5.6000e-004		5.2000e-004	5.2000e-004	0.0000	1.5927	1.5927	5.2000e-004	0.0000	1.6056
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.0200e-003	0.0104	0.0120	2.0000e-005		5.6000e-004	5.6000e-004		5.2000e-004	5.2000e-004	0.0000	1.5927	1.5927	5.2000e-004	0.0000	1.6056

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3.7 Paving - 2021

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/yr										MT/yr					
Hauling	1.0000e-004	4.0200e-003	1.6800e-003	1.0000e-005	1.5000e-004	1.0000e-005	1.6000e-004	4.0000e-005	1.0000e-005	5.0000e-005	0.0000	0.8553	0.8553	1.1000e-004	0.0000	0.8580
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	3.2000e-004	2.1000e-004	2.2500e-003	1.0000e-005	9.8000e-004	1.0000e-005	9.9000e-004	2.6000e-004	1.0000e-005	2.7000e-004	0.0000	0.7903	0.7903	1.0000e-005	0.0000	0.7906
Total	4.2000e-004	4.2300e-003	3.9300e-003	2.0000e-005	1.1300e-003	2.0000e-005	1.1500e-003	3.0000e-004	2.0000e-005	3.2000e-004	0.0000	1.6456	1.6456	1.2000e-004	0.0000	1.6486

3.8 Architectural Coating - 2021

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/yr					
Archit. Coating	1.2777					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.4000e-004	9.0900e-003	0.0137	2.0000e-005		3.7000e-004	3.7000e-004		3.6000e-004	3.6000e-004	0.0000	1.8724	1.8724	4.1000e-004	0.0000	1.8827
Total	1.2787	9.0900e-003	0.0137	2.0000e-005		3.7000e-004	3.7000e-004		3.6000e-004	3.6000e-004	0.0000	1.8724	1.8724	4.1000e-004	0.0000	1.8827

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3.8 Architectural Coating - 2021

Unmitigated 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/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	4.8000e-004	3.2000e-004	3.4100e-003	1.0000e-005	1.5000e-003	1.0000e-005	1.5000e-003	4.0000e-004	1.0000e-005	4.1000e-004	0.0000	1.2012	1.2012	2.0000e-005	0.0000	1.2018
Total	4.8000e-004	3.2000e-004	3.4100e-003	1.0000e-005	1.5000e-003	1.0000e-005	1.5000e-003	4.0000e-004	1.0000e-005	4.1000e-004	0.0000	1.2012	1.2012	2.0000e-005	0.0000	1.2018

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/yr					
Archit. Coating	1.2777					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.4000e-004	9.0900e-003	0.0137	2.0000e-005		3.7000e-004	3.7000e-004		3.6000e-004	3.6000e-004	0.0000	1.8724	1.8724	4.1000e-004	0.0000	1.8827
Total	1.2787	9.0900e-003	0.0137	2.0000e-005		3.7000e-004	3.7000e-004		3.6000e-004	3.6000e-004	0.0000	1.8724	1.8724	4.1000e-004	0.0000	1.8827

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3.8 Architectural Coating - 2021

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/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	4.8000e-004	3.2000e-004	3.4100e-003	1.0000e-005	1.5000e-003	1.0000e-005	1.5000e-003	4.0000e-004	1.0000e-005	4.1000e-004	0.0000	1.2012	1.2012	2.0000e-005	0.0000	1.2018
Total	4.8000e-004	3.2000e-004	3.4100e-003	1.0000e-005	1.5000e-003	1.0000e-005	1.5000e-003	4.0000e-004	1.0000e-005	4.1000e-004	0.0000	1.2012	1.2012	2.0000e-005	0.0000	1.2018

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

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	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/yr					
Mitigated	0.4616	1.4215	5.2653	0.0184	1.7362	0.0155	1.7517	0.4666	0.0144	0.4810	0.0000	1,686.3120	1,686.3120	0.0607	0.0000	1,687.8302
Unmitigated	0.4616	1.4215	5.2653	0.0184	1.7362	0.0155	1.7517	0.4666	0.0144	0.4810	0.0000	1,686.3120	1,686.3120	0.0607	0.0000	1,687.8302

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Office Building	2,579.26	575.25	245.53	4,682,910	4,682,910
Unenclosed Parking with Elevator	0.00	0.00	0.00		
Total	2,579.26	575.25	245.53	4,682,910	4,682,910

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Office Building	9.50	7.30	7.30	33.00	48.00	19.00	77	19	4
Unenclosed Parking with Elevator	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Office Building	0.476244	0.050164	0.262181	0.139658	0.017521	0.006864	0.023236	0.006525	0.004137	0.003158	0.009064	0.000471	0.000777
Unenclosed Parking with Elevator	0.476244	0.050164	0.262181	0.139658	0.017521	0.006864	0.023236	0.006525	0.004137	0.003158	0.009064	0.000471	0.000777

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5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	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/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	496.6653	496.6653	0.0497	0.0103	500.9692
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	496.6653	496.6653	0.0497	0.0103	500.9692
NaturalGas Mitigated	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744
NaturalGas Unmitigated	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744

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5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	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
Land Use	kBTU/yr	tons/yr										MT/yr					
General Office Building	4.54117e+006	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744
Unenclosed 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
Total		0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744

Mitigated

	NaturalGas Use	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
Land Use	kBTU/yr	tons/yr										MT/yr					
General Office Building	4.54117e+006	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744
Unenclosed 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
Total		0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744

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5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	2.98614e+006	392.8018	0.0393	8.1300e-003	396.2056
Unenclosed Parking with Elevator	789586	103.8635	0.0104	2.1500e-003	104.7636
Total		496.6653	0.0497	0.0103	500.9692

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	2.98614e+006	392.8018	0.0393	8.1300e-003	396.2056
Unenclosed Parking with Elevator	789586	103.8635	0.0104	2.1500e-003	104.7636
Total		496.6653	0.0497	0.0103	500.9692

6.0 Area Detail

6.1 Mitigation Measures Area

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	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/yr					
Mitigated	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192
Unmitigated	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192

6.2 Area by SubCategory

Unmitigated

	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
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1278					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.9314					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.6000e-004	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192
Total	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192

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6.2 Area by SubCategory

Mitigated

	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
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1278					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.9314					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.6000e-004	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192
Total	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192

7.0 Water Detail

7.1 Mitigation Measures Water

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	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	54.4953	1.3584	0.0328	98.2394
Unmitigated	54.4953	1.3584	0.0328	98.2394

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Office Building	41.5613 / 25.473	54.4953	1.3584	0.0328	98.2394
Unenclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		54.4953	1.3584	0.0328	98.2394

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7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Office Building	41.5613 / 25.473	54.4953	1.3584	0.0328	98.2394
Unenclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		54.4953	1.3584	0.0328	98.2394

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	44.1444	2.6089	0.0000	109.3660
Unmitigated	44.1444	2.6089	0.0000	109.3660

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8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	217.47	44.1444	2.6089	0.0000	109.3660
Unenclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Total		44.1444	2.6089	0.0000	109.3660

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	217.47	44.1444	2.6089	0.0000	109.3660
Unenclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Total		44.1444	2.6089	0.0000	109.3660

9.0 Operational Offroad

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

Fire Pumps and Emergency Generators

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

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

Equipment Type	Number
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11.0 Vegetation

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1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Office Building	233.84	1000sqft	2.58	233,840.00	0
Unenclosed Parking with Elevator	772.00	Space	0.00	279,995.00	0

1.2 Other Project Characteristics

Urbanization	Urban	Wind Speed (m/s)	2.2	Precipitation Freq (Days)	70
Climate Zone	5			Operational Year	2022
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	290	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

1.3 User Entered Comments & Non-Default Data

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tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	5.00
tblConstEquipMitigation	NumberOfEquipmentMitigated	0.00	2.00
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 3
tblConstEquipMitigation	Tier	No Change	Tier 4 Interim
tblConstructionPhase	NumDays	6.00	10.00
tblConstructionPhase	NumDays	10.00	25.00
tblConstructionPhase	NumDays	3.00	10.00
tblEnergyUse	LightingElect	3.58	3.67
tblEnergyUse	LightingElect	1.75	2.63
tblEnergyUse	T24E	4.10	4.30
tblEnergyUse	T24NG	18.32	18.41
tblGrading	MaterialExported	0.00	2,500.00
tblLandUse	LandUseSquareFeet	308,800.00	279,995.00
tblLandUse	LotAcreage	5.37	2.58
tblLandUse	LotAcreage	6.95	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00

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tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	2.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	2.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	3.00	2.00
tblOffRoadEquipment	UsageHours	6.00	3.60
tblOffRoadEquipment	UsageHours	8.00	2.90
tblOffRoadEquipment	UsageHours	8.00	6.40
tblOffRoadEquipment	UsageHours	8.00	0.80
tblOffRoadEquipment	UsageHours	8.00	0.80
tblOffRoadEquipment	UsageHours	8.00	0.80
tblOffRoadEquipment	UsageHours	8.00	2.00
tblOffRoadEquipment	UsageHours	8.00	0.80
tblOffRoadEquipment	UsageHours	7.00	8.00
tblOffRoadEquipment	UsageHours	8.00	2.90
tblProjectCharacteristics	CO2IntensityFactor	641.35	290
tblTripsAndVMT	HaulingTripLength	20.00	1.00
tblTripsAndVMT	HaulingTripLength	20.00	1.00
tblTripsAndVMT	HaulingTripLength	20.00	1.00
tblTripsAndVMT	HaulingTripLength	20.00	1.00
tblTripsAndVMT	HaulingTripLength	20.00	1.00

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tblTripsAndVMT	HaulingTripLength	20.00	1.00
tblTripsAndVMT	HaulingTripLength	20.00	1.00
tblTripsAndVMT	HaulingTripNumber	55.00	115.00
tblTripsAndVMT	HaulingTripNumber	313.00	312.00
tblTripsAndVMT	HaulingTripNumber	0.00	3,500.00
tblTripsAndVMT	HaulingTripNumber	0.00	50.00
tblTripsAndVMT	VendorTripLength	7.30	1.00
tblTripsAndVMT	VendorTripLength	7.30	1.00
tblTripsAndVMT	VendorTripLength	7.30	1.00
tblTripsAndVMT	VendorTripLength	7.30	1.00
tblTripsAndVMT	VendorTripLength	7.30	1.00
tblTripsAndVMT	VendorTripLength	7.30	1.00
tblTripsAndVMT	VendorTripLength	7.30	1.00
tblTripsAndVMT	VendorTripLength	7.30	1.00

2.0 Emissions Summary

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	3-2-2020	6-1-2020	0.4117	0.3425
2	6-2-2020	9-1-2020	0.3940	0.3610
3	9-2-2020	12-1-2020	0.3901	0.3574
4	12-2-2020	3-1-2021	0.6725	0.6506
5	3-2-2021	6-1-2021	0.9274	0.9271
		Highest	0.9274	0.9271

2.2 Overall Operational

Unmitigated Operational

	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/yr					
Area	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192
Energy	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	738.9996	738.9996	0.0543	0.0147	744.7435
Mobile	0.4616	1.4215	5.2653	0.0184	1.7362	0.0155	1.7517	0.4666	0.0144	0.4810	0.0000	1,686.3120	1,686.3120	0.0607	0.0000	1,687.8302
Waste						0.0000	0.0000		0.0000	0.0000	44.1444	0.0000	44.1444	2.6089	0.0000	109.3660
Water						0.0000	0.0000		0.0000	0.0000	13.1855	41.3099	54.4953	1.3584	0.0328	98.2394
Total	1.5461	1.6441	5.4615	0.0198	1.7362	0.0324	1.7686	0.4666	0.0314	0.4980	57.3299	2,466.6395	2,523.9694	4.0824	0.0476	2,640.1983

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2.2 Overall Operational

Mitigated Operational

	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/yr					
Area	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192
Energy	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	738.9996	738.9996	0.0543	0.0147	744.7435
Mobile	0.4616	1.4215	5.2653	0.0184	1.7362	0.0155	1.7517	0.4666	0.0144	0.4810	0.0000	1,686.3120	1,686.3120	0.0607	0.0000	1,687.8302
Waste						0.0000	0.0000		0.0000	0.0000	44.1444	0.0000	44.1444	2.6089	0.0000	109.3660
Water						0.0000	0.0000		0.0000	0.0000	13.1855	41.3099	54.4953	1.3584	0.0328	98.2394
Total	1.5461	1.6441	5.4615	0.0198	1.7362	0.0324	1.7686	0.4666	0.0314	0.4980	57.3299	2,466.6395	2,523.9694	4.0824	0.0476	2,640.1983

	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
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

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Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	3/2/2020	3/27/2020	5	20	
2	Site Preparation	Site Preparation	3/28/2020	4/10/2020	5	10	
3	Grading	Grading	4/2/2020	4/15/2020	5	10	
4	Trenching	Trenching	4/10/2020	5/6/2020	5	19	
5	Building Construction	Building Construction	4/10/2020	2/11/2021	5	220	
6	Paving	Paving	2/12/2021	3/18/2021	5	25	
7	Architectural Coating	Architectural Coating	2/26/2021	3/11/2021	5	10	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 4

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 350,760; Non-Residential Outdoor: 116,920; Striped Parking Area: 16,800 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Demolition	Concrete/Industrial Saws	0	8.00	81	0.73
Demolition	Excavators	1	4.00	158	0.38
Demolition	Rubber Tired Dozers	1	2.00	247	0.40
Demolition	Tractors/Loaders/Backhoes	0	8.00	97	0.37
Site Preparation	Graders	0	8.00	187	0.41
Site Preparation	Scrapers	0	8.00	367	0.48
Site Preparation	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Grading	Excavators	1	4.00	158	0.38
Grading	Graders	1	6.40	187	0.41

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Grading	Plate Compactors	1	8.00	8	0.43
Grading	Rubber Tired Dozers	0	8.00	247	0.40
Grading	Tractors/Loaders/Backhoes	0	7.00	97	0.37
Trenching	Excavators	2	2.90	158	0.38
Trenching	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Building Construction	Aerial Lifts	2	2.90	63	0.31
Building Construction	Cranes	1	2.90	231	0.29
Building Construction	Forklifts	0	7.00	89	0.20
Building Construction	Generator Sets	0	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	0	6.00	97	0.37
Building Construction	Welders	2	2.90	46	0.45
Paving	Cement and Mortar Mixers	0	8.00	9	0.56
Paving	Pavers	1	0.80	130	0.42
Paving	Paving Equipment	1	0.80	132	0.36
Paving	Rollers	1	0.80	80	0.38
Paving	Tractors/Loaders/Backhoes	1	0.80	97	0.37
Architectural Coating	Aerial Lifts	2	6.00	63	0.31
Architectural Coating	Air Compressors	1	3.60	78	0.48

Trips and VMT

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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	2	5.00	0.00	115.00	10.80	1.00	1.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	2	5.00	0.00	0.00	10.80	1.00	1.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	312.00	10.80	1.00	1.00	LD_Mix	HDT_Mix	HHDT
Trenching	4	10.00	0.00	0.00	10.80	1.00	1.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	192.00	84.00	3,500.00	10.80	1.00	1.00	LD_Mix	HDT_Mix	HHDT
Paving	4	10.00	0.00	50.00	10.80	1.00	1.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	3	38.00	0.00	0.00	10.80	1.00	1.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Cleaner Engines for Construction Equipment

Use Soil Stabilizer

Replace Ground Cover

Water Exposed Area

Reduce Vehicle Speed on Unpaved Roads

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3.2 Demolition - 2020

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/yr					
Fugitive Dust					5.9100e-003	0.0000	5.9100e-003	8.9000e-004	0.0000	8.9000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.9200e-003	0.0404	0.0267	5.0000e-005		1.9700e-003	1.9700e-003		1.8100e-003	1.8100e-003	0.0000	4.1449	4.1449	1.3400e-003	0.0000	4.1784
Total	3.9200e-003	0.0404	0.0267	5.0000e-005	5.9100e-003	1.9700e-003	7.8800e-003	8.9000e-004	1.8100e-003	2.7000e-003	0.0000	4.1449	4.1449	1.3400e-003	0.0000	4.1784

Unmitigated 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/yr										MT/yr					
Hauling	1.2000e-004	5.6300e-003	1.7600e-003	1.0000e-005	5.0000e-005	1.0000e-005	6.0000e-005	1.0000e-005	1.0000e-005	2.0000e-005	0.0000	0.6108	0.6108	7.0000e-005	0.0000	0.6127
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	1.4000e-004	9.0000e-005	9.7000e-004	0.0000	3.9000e-004	0.0000	4.0000e-004	1.0000e-004	0.0000	1.1000e-004	0.0000	0.3278	0.3278	1.0000e-005	0.0000	0.3279
Total	2.6000e-004	5.7200e-003	2.7300e-003	1.0000e-005	4.4000e-004	1.0000e-005	4.6000e-004	1.1000e-004	1.0000e-005	1.3000e-004	0.0000	0.9386	0.9386	8.0000e-005	0.0000	0.9406

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3.2 Demolition - 2020

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/yr					
Fugitive Dust					2.6600e-003	0.0000	2.6600e-003	2.0000e-004	0.0000	2.0000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.1600e-003	0.0224	0.0309	5.0000e-005		9.8000e-004	9.8000e-004		9.8000e-004	9.8000e-004	0.0000	4.1449	4.1449	1.3400e-003	0.0000	4.1784
Total	1.1600e-003	0.0224	0.0309	5.0000e-005	2.6600e-003	9.8000e-004	3.6400e-003	2.0000e-004	9.8000e-004	1.1800e-003	0.0000	4.1449	4.1449	1.3400e-003	0.0000	4.1784

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/yr										MT/yr					
Hauling	1.2000e-004	5.6300e-003	1.7600e-003	1.0000e-005	5.0000e-005	1.0000e-005	6.0000e-005	1.0000e-005	1.0000e-005	2.0000e-005	0.0000	0.6108	0.6108	7.0000e-005	0.0000	0.6127
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	1.4000e-004	9.0000e-005	9.7000e-004	0.0000	3.9000e-004	0.0000	4.0000e-004	1.0000e-004	0.0000	1.1000e-004	0.0000	0.3278	0.3278	1.0000e-005	0.0000	0.3279
Total	2.6000e-004	5.7200e-003	2.7300e-003	1.0000e-005	4.4000e-004	1.0000e-005	4.6000e-004	1.1000e-004	1.0000e-005	1.3000e-004	0.0000	0.9386	0.9386	8.0000e-005	0.0000	0.9406

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3.3 Site Preparation - 2020

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/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.1000e-003	0.0211	0.0228	3.0000e-005		1.3300e-003	1.3300e-003		1.2200e-003	1.2200e-003	0.0000	2.7285	2.7285	8.8000e-004	0.0000	2.7506
Total	2.1000e-003	0.0211	0.0228	3.0000e-005	0.0000	1.3300e-003	1.3300e-003	0.0000	1.2200e-003	1.2200e-003	0.0000	2.7285	2.7285	8.8000e-004	0.0000	2.7506

Unmitigated 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/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	7.0000e-005	5.0000e-005	4.9000e-004	0.0000	2.0000e-004	0.0000	2.0000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1639	0.1639	0.0000	0.0000	0.1640
Total	7.0000e-005	5.0000e-005	4.9000e-004	0.0000	2.0000e-004	0.0000	2.0000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1639	0.1639	0.0000	0.0000	0.1640

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3.3 Site Preparation - 2020

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/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	7.6000e-004	0.0173	0.0234	3.0000e-005		1.2200e-003	1.2200e-003		1.2200e-003	1.2200e-003	0.0000	2.7285	2.7285	8.8000e-004	0.0000	2.7506
Total	7.6000e-004	0.0173	0.0234	3.0000e-005	0.0000	1.2200e-003	1.2200e-003	0.0000	1.2200e-003	1.2200e-003	0.0000	2.7285	2.7285	8.8000e-004	0.0000	2.7506

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/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	7.0000e-005	5.0000e-005	4.9000e-004	0.0000	2.0000e-004	0.0000	2.0000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1639	0.1639	0.0000	0.0000	0.1640
Total	7.0000e-005	5.0000e-005	4.9000e-004	0.0000	2.0000e-004	0.0000	2.0000e-004	5.0000e-005	0.0000	5.0000e-005	0.0000	0.1639	0.1639	0.0000	0.0000	0.1640

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3.4 Grading - 2020

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/yr					
Fugitive Dust					2.2600e-003	0.0000	2.2600e-003	2.5000e-004	0.0000	2.5000e-004	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.7200e-003	0.0326	0.0165	4.0000e-005		1.1500e-003	1.1500e-003		1.0600e-003	1.0600e-003	0.0000	3.6229	3.6229	1.1400e-003	0.0000	3.6513
Total	2.7200e-003	0.0326	0.0165	4.0000e-005	2.2600e-003	1.1500e-003	3.4100e-003	2.5000e-004	1.0600e-003	1.3100e-003	0.0000	3.6229	3.6229	1.1400e-003	0.0000	3.6513

Unmitigated 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/yr										MT/yr					
Hauling	3.3000e-004	0.0153	4.7900e-003	2.0000e-005	1.3000e-004	2.0000e-005	1.5000e-004	4.0000e-005	2.0000e-005	6.0000e-005	0.0000	1.6572	1.6572	2.0000e-004	0.0000	1.6622
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	1.1000e-004	7.0000e-005	7.8000e-004	0.0000	3.1000e-004	0.0000	3.2000e-004	8.0000e-005	0.0000	9.0000e-005	0.0000	0.2622	0.2622	1.0000e-005	0.0000	0.2623
Total	4.4000e-004	0.0153	5.5700e-003	2.0000e-005	4.4000e-004	2.0000e-005	4.7000e-004	1.2000e-004	2.0000e-005	1.5000e-004	0.0000	1.9194	1.9194	2.1000e-004	0.0000	1.9245

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3.4 Grading - 2020

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/yr					
Fugitive Dust					1.0200e-003	0.0000	1.0200e-003	6.0000e-005	0.0000	6.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.7000e-004	0.0187	0.0239	4.0000e-005		7.7000e-004	7.7000e-004		7.7000e-004	7.7000e-004	0.0000	3.6229	3.6229	1.1400e-003	0.0000	3.6513
Total	9.7000e-004	0.0187	0.0239	4.0000e-005	1.0200e-003	7.7000e-004	1.7900e-003	6.0000e-005	7.7000e-004	8.3000e-004	0.0000	3.6229	3.6229	1.1400e-003	0.0000	3.6513

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/yr										MT/yr					
Hauling	3.3000e-004	0.0153	4.7900e-003	2.0000e-005	1.3000e-004	2.0000e-005	1.5000e-004	4.0000e-005	2.0000e-005	6.0000e-005	0.0000	1.6572	1.6572	2.0000e-004	0.0000	1.6622
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	1.1000e-004	7.0000e-005	7.8000e-004	0.0000	3.1000e-004	0.0000	3.2000e-004	8.0000e-005	0.0000	9.0000e-005	0.0000	0.2622	0.2622	1.0000e-005	0.0000	0.2623
Total	4.4000e-004	0.0153	5.5700e-003	2.0000e-005	4.4000e-004	2.0000e-005	4.7000e-004	1.2000e-004	2.0000e-005	1.5000e-004	0.0000	1.9194	1.9194	2.1000e-004	0.0000	1.9245

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3.5 Trenching - 2020

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/yr					
Off-Road	5.6700e-003	0.0566	0.0658	9.0000e-005		3.3300e-003	3.3300e-003		3.0700e-003	3.0700e-003	0.0000	8.3091	8.3091	2.6900e-003	0.0000	8.3762
Total	5.6700e-003	0.0566	0.0658	9.0000e-005		3.3300e-003	3.3300e-003		3.0700e-003	3.0700e-003	0.0000	8.3091	8.3091	2.6900e-003	0.0000	8.3762

Unmitigated 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/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	2.6000e-004	1.8000e-004	1.8500e-003	1.0000e-005	7.5000e-004	0.0000	7.5000e-004	2.0000e-004	0.0000	2.0000e-004	0.0000	0.6228	0.6228	1.0000e-005	0.0000	0.6231
Total	2.6000e-004	1.8000e-004	1.8500e-003	1.0000e-005	7.5000e-004	0.0000	7.5000e-004	2.0000e-004	0.0000	2.0000e-004	0.0000	0.6228	0.6228	1.0000e-005	0.0000	0.6231

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3.5 Trenching - 2020

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/yr					
Off-Road	2.3200e-003	0.0499	0.0715	9.0000e-005		3.1300e-003	3.1300e-003		3.1300e-003	3.1300e-003	0.0000	8.3091	8.3091	2.6900e-003	0.0000	8.3762
Total	2.3200e-003	0.0499	0.0715	9.0000e-005		3.1300e-003	3.1300e-003		3.1300e-003	3.1300e-003	0.0000	8.3091	8.3091	2.6900e-003	0.0000	8.3762

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/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	2.6000e-004	1.8000e-004	1.8500e-003	1.0000e-005	7.5000e-004	0.0000	7.5000e-004	2.0000e-004	0.0000	2.0000e-004	0.0000	0.6228	0.6228	1.0000e-005	0.0000	0.6231
Total	2.6000e-004	1.8000e-004	1.8500e-003	1.0000e-005	7.5000e-004	0.0000	7.5000e-004	2.0000e-004	0.0000	2.0000e-004	0.0000	0.6228	0.6228	1.0000e-005	0.0000	0.6231

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3.6 Building Construction - 2020

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/yr					
Off-Road	0.0419	0.3382	0.2699	4.9000e-004		0.0146	0.0146		0.0139	0.0139	0.0000	40.5818	40.5818	0.0109	0.0000	40.8530
Total	0.0419	0.3382	0.2699	4.9000e-004		0.0146	0.0146		0.0139	0.0139	0.0000	40.5818	40.5818	0.0109	0.0000	40.8530

Unmitigated 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/yr										MT/yr					
Hauling	3.2000e-003	0.1479	0.0464	1.6000e-004	1.4400e-003	1.8000e-004	1.6300e-003	3.9000e-004	1.8000e-004	5.7000e-004	0.0000	16.0552	16.0552	1.9300e-003	0.0000	16.1036
Vendor	0.0143	0.5112	0.1969	5.4000e-004	7.3000e-003	9.5000e-004	8.2600e-003	2.1300e-003	9.1000e-004	3.0400e-003	0.0000	54.5536	54.5536	5.8000e-003	0.0000	54.6985
Worker	0.0497	0.0337	0.3550	1.3200e-003	0.1436	9.0000e-004	0.1445	0.0382	8.3000e-004	0.0390	0.0000	119.5685	119.5685	2.3300e-003	0.0000	119.6268
Total	0.0672	0.6928	0.5983	2.0200e-003	0.1523	2.0300e-003	0.1544	0.0407	1.9200e-003	0.0427	0.0000	190.1774	190.1774	0.0101	0.0000	190.4289

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3.6 Building Construction - 2020

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/yr					
Off-Road	0.0108	0.2738	0.2967	4.9000e-004		0.0114	0.0114		0.0114	0.0114	0.0000	40.5818	40.5818	0.0109	0.0000	40.8530
Total	0.0108	0.2738	0.2967	4.9000e-004		0.0114	0.0114		0.0114	0.0114	0.0000	40.5818	40.5818	0.0109	0.0000	40.8530

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/yr										MT/yr					
Hauling	3.2000e-003	0.1479	0.0464	1.6000e-004	1.4400e-003	1.8000e-004	1.6300e-003	3.9000e-004	1.8000e-004	5.7000e-004	0.0000	16.0552	16.0552	1.9300e-003	0.0000	16.1036
Vendor	0.0143	0.5112	0.1969	5.4000e-004	7.3000e-003	9.5000e-004	8.2600e-003	2.1300e-003	9.1000e-004	3.0400e-003	0.0000	54.5536	54.5536	5.8000e-003	0.0000	54.6985
Worker	0.0497	0.0337	0.3550	1.3200e-003	0.1436	9.0000e-004	0.1445	0.0382	8.3000e-004	0.0390	0.0000	119.5685	119.5685	2.3300e-003	0.0000	119.6268
Total	0.0672	0.6928	0.5983	2.0200e-003	0.1523	2.0300e-003	0.1544	0.0407	1.9200e-003	0.0427	0.0000	190.1774	190.1774	0.0101	0.0000	190.4289

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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/yr					
Off-Road	5.9400e-003	0.0493	0.0414	8.0000e-005		2.0000e-003	2.0000e-003		1.9100e-003	1.9100e-003	0.0000	6.4074	6.4074	1.6800e-003	0.0000	6.4493
Total	5.9400e-003	0.0493	0.0414	8.0000e-005		2.0000e-003	2.0000e-003		1.9100e-003	1.9100e-003	0.0000	6.4074	6.4074	1.6800e-003	0.0000	6.4493

Unmitigated 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/yr										MT/yr					
Hauling	4.8000e-004	0.0222	7.4900e-003	2.0000e-005	1.1600e-003	3.0000e-005	1.1800e-003	2.9000e-004	2.0000e-005	3.1000e-004	0.0000	2.4914	2.4914	2.9000e-004	0.0000	2.4987
Vendor	2.0200e-003	0.0760	0.0302	8.0000e-005	1.1500e-003	8.0000e-005	1.2300e-003	3.4000e-004	8.0000e-005	4.1000e-004	0.0000	8.4876	8.4876	8.6000e-004	0.0000	8.5091
Worker	7.3400e-003	4.7800e-003	0.0518	2.0000e-004	0.0227	1.4000e-004	0.0228	6.0300e-003	1.3000e-004	6.1600e-003	0.0000	18.2077	18.2077	3.3000e-004	0.0000	18.2159
Total	9.8400e-003	0.1030	0.0894	3.0000e-004	0.0250	2.5000e-004	0.0252	6.6600e-003	2.3000e-004	6.8800e-003	0.0000	29.1866	29.1866	1.4800e-003	0.0000	29.2237

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3.6 Building Construction - 2021

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/yr					
Off-Road	1.7000e-003	0.0432	0.0468	8.0000e-005		1.7900e-003	1.7900e-003		1.7900e-003	1.7900e-003	0.0000	6.4074	6.4074	1.6800e-003	0.0000	6.4493
Total	1.7000e-003	0.0432	0.0468	8.0000e-005		1.7900e-003	1.7900e-003		1.7900e-003	1.7900e-003	0.0000	6.4074	6.4074	1.6800e-003	0.0000	6.4493

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/yr										MT/yr					
Hauling	4.8000e-004	0.0222	7.4900e-003	2.0000e-005	1.1600e-003	3.0000e-005	1.1800e-003	2.9000e-004	2.0000e-005	3.1000e-004	0.0000	2.4914	2.4914	2.9000e-004	0.0000	2.4987
Vendor	2.0200e-003	0.0760	0.0302	8.0000e-005	1.1500e-003	8.0000e-005	1.2300e-003	3.4000e-004	8.0000e-005	4.1000e-004	0.0000	8.4876	8.4876	8.6000e-004	0.0000	8.5091
Worker	7.3400e-003	4.7800e-003	0.0518	2.0000e-004	0.0227	1.4000e-004	0.0228	6.0300e-003	1.3000e-004	6.1600e-003	0.0000	18.2077	18.2077	3.3000e-004	0.0000	18.2159
Total	9.8400e-003	0.1030	0.0894	3.0000e-004	0.0250	2.5000e-004	0.0252	6.6600e-003	2.3000e-004	6.8800e-003	0.0000	29.1866	29.1866	1.4800e-003	0.0000	29.2237

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3.7 Paving - 2021

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/yr					
Off-Road	1.0200e-003	0.0104	0.0120	2.0000e-005		5.6000e-004	5.6000e-004		5.2000e-004	5.2000e-004	0.0000	1.5927	1.5927	5.2000e-004	0.0000	1.6056
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	1.0200e-003	0.0104	0.0120	2.0000e-005		5.6000e-004	5.6000e-004		5.2000e-004	5.2000e-004	0.0000	1.5927	1.5927	5.2000e-004	0.0000	1.6056

Unmitigated 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/yr										MT/yr					
Hauling	5.0000e-005	2.3300e-003	7.8000e-004	0.0000	2.0000e-005	0.0000	2.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.2610	0.2610	3.0000e-005	0.0000	0.2618
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	3.2000e-004	2.1000e-004	2.2500e-003	1.0000e-005	9.8000e-004	1.0000e-005	9.9000e-004	2.6000e-004	1.0000e-005	2.7000e-004	0.0000	0.7903	0.7903	1.0000e-005	0.0000	0.7906
Total	3.7000e-004	2.5400e-003	3.0300e-003	1.0000e-005	1.0000e-003	1.0000e-005	1.0100e-003	2.7000e-004	1.0000e-005	2.8000e-004	0.0000	1.0513	1.0513	4.0000e-005	0.0000	1.0524

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3.7 Paving - 2021

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/yr					
Off-Road	4.5000e-004	9.2300e-003	0.0137	2.0000e-005		5.3000e-004	5.3000e-004		5.3000e-004	5.3000e-004	0.0000	1.5927	1.5927	5.2000e-004	0.0000	1.6056
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	4.5000e-004	9.2300e-003	0.0137	2.0000e-005		5.3000e-004	5.3000e-004		5.3000e-004	5.3000e-004	0.0000	1.5927	1.5927	5.2000e-004	0.0000	1.6056

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/yr										MT/yr					
Hauling	5.0000e-005	2.3300e-003	7.8000e-004	0.0000	2.0000e-005	0.0000	2.0000e-005	1.0000e-005	0.0000	1.0000e-005	0.0000	0.2610	0.2610	3.0000e-005	0.0000	0.2618
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	3.2000e-004	2.1000e-004	2.2500e-003	1.0000e-005	9.8000e-004	1.0000e-005	9.9000e-004	2.6000e-004	1.0000e-005	2.7000e-004	0.0000	0.7903	0.7903	1.0000e-005	0.0000	0.7906
Total	3.7000e-004	2.5400e-003	3.0300e-003	1.0000e-005	1.0000e-003	1.0000e-005	1.0100e-003	2.7000e-004	1.0000e-005	2.8000e-004	0.0000	1.0513	1.0513	4.0000e-005	0.0000	1.0524

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3.8 Architectural Coating - 2021

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/yr					
Archit. Coating	1.2777					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	9.4000e-004	9.0900e-003	0.0137	2.0000e-005		3.7000e-004	3.7000e-004		3.6000e-004	3.6000e-004	0.0000	1.8724	1.8724	4.1000e-004	0.0000	1.8827
Total	1.2787	9.0900e-003	0.0137	2.0000e-005		3.7000e-004	3.7000e-004		3.6000e-004	3.6000e-004	0.0000	1.8724	1.8724	4.1000e-004	0.0000	1.8827

Unmitigated 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/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	4.8000e-004	3.2000e-004	3.4100e-003	1.0000e-005	1.5000e-003	1.0000e-005	1.5000e-003	4.0000e-004	1.0000e-005	4.1000e-004	0.0000	1.2012	1.2012	2.0000e-005	0.0000	1.2018
Total	4.8000e-004	3.2000e-004	3.4100e-003	1.0000e-005	1.5000e-003	1.0000e-005	1.5000e-003	4.0000e-004	1.0000e-005	4.1000e-004	0.0000	1.2012	1.2012	2.0000e-005	0.0000	1.2018

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3.8 Architectural Coating - 2021

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/yr					
Archit. Coating	1.2777					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	4.7000e-004	0.0103	0.0151	2.0000e-005		5.1000e-004	5.1000e-004		5.1000e-004	5.1000e-004	0.0000	1.8724	1.8724	4.1000e-004	0.0000	1.8827
Total	1.2782	0.0103	0.0151	2.0000e-005		5.1000e-004	5.1000e-004		5.1000e-004	5.1000e-004	0.0000	1.8724	1.8724	4.1000e-004	0.0000	1.8827

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/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	4.8000e-004	3.2000e-004	3.4100e-003	1.0000e-005	1.5000e-003	1.0000e-005	1.5000e-003	4.0000e-004	1.0000e-005	4.1000e-004	0.0000	1.2012	1.2012	2.0000e-005	0.0000	1.2018
Total	4.8000e-004	3.2000e-004	3.4100e-003	1.0000e-005	1.5000e-003	1.0000e-005	1.5000e-003	4.0000e-004	1.0000e-005	4.1000e-004	0.0000	1.2012	1.2012	2.0000e-005	0.0000	1.2018

4.0 Operational Detail - Mobile

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4.1 Mitigation Measures Mobile

	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/yr					
Mitigated	0.4616	1.4215	5.2653	0.0184	1.7362	0.0155	1.7517	0.4666	0.0144	0.4810	0.0000	1,686.3120	1,686.3120	0.0607	0.0000	1,687.8302
Unmitigated	0.4616	1.4215	5.2653	0.0184	1.7362	0.0155	1.7517	0.4666	0.0144	0.4810	0.0000	1,686.3120	1,686.3120	0.0607	0.0000	1,687.8302

4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Office Building	2,579.26	575.25	245.53	4,682,910	4,682,910
Unenclosed Parking with Elevator	0.00	0.00	0.00		
Total	2,579.26	575.25	245.53	4,682,910	4,682,910

4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Office Building	9.50	7.30	7.30	33.00	48.00	19.00	77	19	4
Unenclosed Parking with	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

4.4 Fleet Mix

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Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Office Building	0.476244	0.050164	0.262181	0.139658	0.017521	0.006864	0.023236	0.006525	0.004137	0.003158	0.009064	0.000471	0.000777
Unenclosed Parking with Elevator	0.476244	0.050164	0.262181	0.139658	0.017521	0.006864	0.023236	0.006525	0.004137	0.003158	0.009064	0.000471	0.000777

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	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/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	496.6653	496.6653	0.0497	0.0103	500.9692
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	496.6653	496.6653	0.0497	0.0103	500.9692
NaturalGas Mitigated	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744
NaturalGas Unmitigated	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744

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5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	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
Land Use	kBTU/yr	tons/yr										MT/yr					
General Office Building	4.54117e+006	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744
Unenclosed 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
Total		0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744

Mitigated

	NaturalGas Use	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
Land Use	kBTU/yr	tons/yr										MT/yr					
General Office Building	4.54117e+006	0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744
Unenclosed 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
Total		0.0245	0.2226	0.1870	1.3400e-003		0.0169	0.0169		0.0169	0.0169	0.0000	242.3343	242.3343	4.6400e-003	4.4400e-003	243.7744

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5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	2.98614e+006	392.8018	0.0393	8.1300e-003	396.2056
Unenclosed Parking with Elevator	789586	103.8635	0.0104	2.1500e-003	104.7636
Total		496.6653	0.0497	0.0103	500.9692

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Office Building	2.98614e+006	392.8018	0.0393	8.1300e-003	396.2056
Unenclosed Parking with Elevator	789586	103.8635	0.0104	2.1500e-003	104.7636
Total		496.6653	0.0497	0.0103	500.9692

6.0 Area Detail

6.1 Mitigation Measures Area

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	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/yr					
Mitigated	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192
Unmitigated	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192

6.2 Area by SubCategory

Unmitigated

	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
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1278					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.9314					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.6000e-004	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192
Total	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192

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6.2 Area by SubCategory

Mitigated

	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
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.1278					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.9314					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.6000e-004	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192
Total	1.0600	8.0000e-005	9.2600e-003	0.0000		3.0000e-005	3.0000e-005		3.0000e-005	3.0000e-005	0.0000	0.0180	0.0180	5.0000e-005	0.0000	0.0192

7.0 Water Detail

7.1 Mitigation Measures Water

University Plaza, East Palo Alto - Construction TAC - San Mateo County, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	54.4953	1.3584	0.0328	98.2394
Unmitigated	54.4953	1.3584	0.0328	98.2394

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Office Building	41.5613 / 25.473	54.4953	1.3584	0.0328	98.2394
Unenclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		54.4953	1.3584	0.0328	98.2394

University Plaza, East Palo Alto - Construction TAC - San Mateo County, Annual

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Office Building	41.5613 / 25.473	54.4953	1.3584	0.0328	98.2394
Unenclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		54.4953	1.3584	0.0328	98.2394

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	44.1444	2.6089	0.0000	109.3660
Unmitigated	44.1444	2.6089	0.0000	109.3660

University Plaza, East Palo Alto - Construction TAC - San Mateo County, Annual

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	217.47	44.1444	2.6089	0.0000	109.3660
Unenclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Total		44.1444	2.6089	0.0000	109.3660

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Office Building	217.47	44.1444	2.6089	0.0000	109.3660
Unenclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Total		44.1444	2.6089	0.0000	109.3660

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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University Plaza, East Palo Alto - Construction TAC - San Mateo County, Annual

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

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

Equipment Type	Number
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11.0 Vegetation

Road Construction Emissions Model, Version 9.0.0

Daily Emission Estimates for -> University Plaza Ramp Realignment														
Project Phases (Pounds)	ROG (lbs/day)	CO (lbs/day)	NOx (lbs/day)	Total PM10 (lbs/day)	Exhaust PM10 (lbs/day)	Fugitive Dust PM10 (lbs/day)	Total PM2.5 (lbs/day)	Exhaust PM2.5 (lbs/day)	Fugitive Dust PM2.5 (lbs/day)	SOx (lbs/day)	CO2 (lbs/day)	CH4 (lbs/day)	N2O (lbs/day)	CO2e (lbs/day)
Grubbing/Land Clearing	1.58	10.35	16.42	0.94	0.84	0.10	0.78	0.76	0.02	0.02	2,062.66	0.53	0.06	2,094.75
Grading/Excavation	1.01	8.82	18.82	0.85	0.75	0.10	0.50	0.48	0.02	0.07	7,408.86	0.39	0.92	7,691.58
Drainage/Utilities/Sub-Grade	2.67	21.21	27.73	1.34	1.24	0.10	1.13	1.11	0.02	0.05	4,662.33	1.23	0.09	4,720.62
Paving	0.83	9.63	9.45	0.51	0.51	0.00	0.42	0.42	0.00	0.03	2,519.89	0.40	0.18	2,582.54
Maximum (pounds/day)	2.67	21.21	27.73	1.34	1.24	0.10	1.13	1.11	0.02	0.07	7,408.86	1.23	0.92	7,691.58
Total (tons/construction project)	0.05	0.35	0.56	0.03	0.03	0.00	0.02	0.02	0.00	0.00	128.44	0.02	0.01	132.02

Notes: Project Start Year -> 2020
 Project Length (months) -> 3
 Total Project Area (acres) -> 1
 Maximum Area Disturbed/Day (acres) -> 0
 Water Truck Used? -> Yes

Phase	Total Material Imported/Exported Volume (yd ³ /day)		Daily VMT (miles/day)			
	Soil	Asphalt	Soil Hauling	Asphalt Hauling	Worker Commute	Water Truck
Grubbing/Land Clearing	4	0	30	0	200	40
Grading/Excavation	907	0	1,380	0	800	40
Drainage/Utilities/Sub-Grade	0	13	0	30	560	40
Paving	0	130	0	210	400	40

PM10 and PM2.5 estimates assume 50% control of fugitive dust from watering and associated dust control measures if a minimum number of water trucks are specified.

Total PM10 emissions shown in column F are the sum of exhaust and fugitive dust emissions shown in columns G and H. Total PM2.5 emissions shown in Column I are the sum of exhaust and fugitive dust emissions shown in columns J and K.

CO2e emissions are estimated by multiplying mass emissions for each GHG by its global warming potential (GWP), 1, 25 and 298 for CO2, CH4 and N2O, respectively. Total CO2e is then estimated by summing CO2e estimates over all GHGs.

Total Emission Estimates by Phase for -> University Plaza Ramp Realignment														
Project Phases (Tons for all except CO2e. Metric tonnes for CO2e)	ROG (tons/phase)	CO (tons/phase)	NOx (tons/phase)	Total PM10 (tons/phase)	Exhaust PM10 (tons/phase)	Fugitive Dust PM10 (tons/phase)	Total PM2.5 (tons/phase)	Exhaust PM2.5 (tons/phase)	Fugitive Dust PM2.5 (tons/phase)	SOx (tons/phase)	CO2 (tons/phase)	CH4 (tons/phase)	N2O (tons/phase)	CO2e (MT/phase)
Grubbing/Land Clearing	0.02	0.13	0.20	0.01	0.01	0.00	0.01	0.01	0.00	0.00	25.64	0.01	0.00	23.62
Grading/Excavation	0.01	0.09	0.19	0.01	0.01	0.00	0.00	0.00	0.00	0.00	73.35	0.00	0.01	69.08
Drainage/Utilities/Sub-Grade	0.02	0.13	0.17	0.01	0.01	0.00	0.01	0.01	0.00	0.00	28.21	0.01	0.00	25.91
Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	1.25	0.00	0.00	1.16
Maximum (tons/phase)	0.02	0.13	0.20	0.01	0.01	0.00	0.01	0.01	0.00	0.00	73.35	0.01	0.01	69.08
Total (tons/construction project)	0.05	0.35	0.56	0.03	0.03	0.00	0.02	0.02	0.00	0.00	128.44	0.02	0.01	119.77

PM10 and PM2.5 estimates assume 50% control of fugitive dust from watering and associated dust control measures if a minimum number of water trucks are specified.

Total PM10 emissions shown in column F are the sum of exhaust and fugitive dust emissions shown in columns G and H. Total PM2.5 emissions shown in Column I are the sum of exhaust and fugitive dust emissions shown in columns J and K.

CO2e emissions are estimated by multiplying mass emissions for each GHG by its global warming potential (GWP), 1, 25 and 298 for CO2, CH4 and N2O, respectively. Total CO2e is then estimated by summing CO2e estimates over all GHGs.

The CO2e emissions are reported as metric tons per phase.

Road Construction Emissions Model
Data Entry Worksheet

Note: Required data input sections have a yellow background.
Optional data input sections have a blue background. Only areas with a yellow or blue background can be modified. Program defaults have a white background.
The user is required to enter information in cells D10 through D24, E28 through G35, and D38 through D41 for all project types.
Please use "Clear Data Input & User Overrides" button first before changing the Project Type or begin a new project.

Input Type

Project Name
University Plaza Ramp Realignment

Construction Start Year
2020

Project Type
2

Project Construction Time
2.60

Working Days per Month
22.00

Predominant Soil/Site Type: Enter 1, 2, or 3
(for project within "Sacramento County", follow soil type selection instructions in cells E18 to E20 otherwise see instructions provided in cells J18 to J22)
2

Project Length
0.15


Total Project Area
0.85

Maximum Area Disturbed/Day
0.01

Water Trucks Used?
1

Version 9.0.0

To begin a new project, click this button to clear data previously entered. This button will only work if you opted not to disable macros when loading this spreadsheet.



Enter a Year between 2014 and 2040 (inclusive)

- 1) New Road Construction : Project to build a roadway from bare ground, which generally requires more site preparation than widening an existing roadway;
- 2) Road Widening : Project to add a new lane to an existing roadway
- 3) Bridge/Overpass Construction : Project to build an elevated roadway, which generally requires some different equipment than a new roadway, such as a crane;
- 4) Other Linear Project Type: Non-roadway project such as a pipeline, transmission line, or levee construction

months
days (assume 22 if unknown)

- 1) Sand Gravel : Use for quaternary deposits (Delta/West County)
- 2) Weathered Rock-Earth : Use for Laguna formation (Jackson Highway area) or the lone formation (Scott Road, Rancho Murieta)
- 3) Blasted Rock : Use for Salt Springs Slate or Copper Hill Volcanics (Folsom South of Highway 50, Rancho Murieta)

miles
acres
acres

1. Yes
2. No

Please note that the soil type instructions provided in cells E18 to E20 are specific to Sacramento County. Maps available from the California Geologic Survey (see weblink below) can be used to determine soil type outside Sacramento County.

http://www.conservation.ca.gov/cgs/information/geologic_mapping/Pages/googlemaps.aspx?regionalseries

Material Hauling Quantity Input

Material Type	Phase	Haul Truck Capacity (yd ³) (assume 20 if unknown)	Import Volume (yd ³ /day)	Export Volume (yd ³ /day)
Soil	Grubbing/Land Clearing	20.00		4.00
	Grading/Excavation	20.00		907.00
	Drainage/Utilities/Sub-Grade			
	Paving			
Asphalt	Grubbing/Land Clearing			
	Grading/Excavation			
	Drainage/Utilities/Sub-Grade	20.00	6.70	6.70
	Paving	20.00	130.00	

Mitigation Options

On-road Fleet Emissions Mitigation

Off-road Equipment Emissions Mitigation

Select "2010 and Newer On-road Vehicles Fleet" option when the on-road heavy-duty truck fleet for the project will be limited to vehicles of model year 2010 or newer.
Select "20% NOx and 45% Exhaust PM reduction" option if the project will be required to use a lower emitting off-road construction fleet. The SMAQMD Construction Mitigation Calculator can be used to confirm compliance with this mitigation measure (<http://www.airquality.org/Businesses/CEQA-Land-Use-Planning/Mitigation>).
Select "Tier 4 Equipment" option if some or all off-road equipment used for the project meets CARB Tier 4 Standard

The remaining sections of this sheet contain areas that can be modified by the user, although those modifications are optional.

Note: The program's estimates of construction period phase length can be overridden in cells D50 through D53, and F50 through F53.

Construction Periods	User Override of Construction Months	Program Calculated Months	User Override of Phase Starting Date	Program Default Phase Starting Date
	Grubbing/Land Clearing	1.13	0.26	3/1/2020
Grading/Excavation	0.80	1.17	4/6/2020	2/5/2020
Drainage/Utilities/Sub-Grade	0.55	0.78	4/2/2020	3/4/2020
Paving	0.05	0.39	5/22/2020	3/21/2020
Totals (Months)		3		

Please note: You have entered a different number of months than the project length shown in cell D16.
 Note: Soil Hauling emission default values can be overridden in cells D61 through D64, and F61 through F64.

Soil Hauling Emissions		User Override of Miles/Round Trip	Program Estimate of Miles/Round Trip	User Override of Truck Round Trips/Day	Default Values Round Trips/Day	Calculated Daily VMT
User Input						
Miles/round trip: Grubbing/Land Clearing		30.00			1	30.00
Miles/round trip: Grading/Excavation		30.00			66	1380.00
Miles/round trip: Drainage/Utilities/Sub-Grade		30.00			0	0.00
Miles/round trip: Paving		30.00			0	0.00
Emission Rates						
	ROG	CO	Nox	PM10	PM2.5	SOx
Grubbing/Land Clearing (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02
Grading/Excavation (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02
Drainage/Utilities/Sub-Grade (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02
Paving (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02
Grubbing/Land Clearing (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00
Grading/Excavation (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00
Drainage/Utilities/Sub-Grade (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00
Paving (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00
Hauling Emissions						
	ROG	CO	Nox	PM10	PM2.5	SOx
Pounds per day - Grubbing/Land Clearing	0.00	0.03	0.21	0.01	0.00	0.00
Tons per const. Period - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00
Pounds per day - Grading/Excavation	0.13	1.28	9.55	0.34	0.15	0.05
Tons per const. Period - Grading/Excavation	0.00	0.01	0.09	0.00	0.00	0.00
Pounds per day - Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00
Pounds per day - Paving	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Paving	0.00	0.00	0.00	0.00	0.00	0.00
Total tons per construction project	0.00	0.01	0.10	0.00	0.00	0.00

Note: Asphalt Hauling emission default values can be overridden in cells D91 through D94, and F91 through F94.

Asphalt Hauling Emissions		User Override of Miles/Round Trip	Program Estimate of Miles/Round Trip	User Override of Truck Round Trips/Day	Default Values Round Trips/Day	Calculated Daily VMT
User Input						
Miles/round trip: Grubbing/Land Clearing		30.00			0	0.00
Miles/round trip: Grading/Excavation		30.00			0	0.00
Miles/round trip: Drainage/Utilities/Sub-Grade		30.00			1	30.00
Miles/round trip: Paving		30.00			7	210.00
Emission Rates						
	ROG	CO	Nox	PM10	PM2.5	SOx
Grubbing/Land Clearing (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02
Grading/Excavation (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02
Drainage/Utilities/Sub-Grade (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02
Paving (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02
Grubbing/Land Clearing (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00
Grading/Excavation (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00
Drainage/Utilities/Sub-Grade (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00
Paving (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00
Emissions						
	ROG	CO	Nox	PM10	PM2.5	SOx
Pounds per day - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00
Pounds per day - Grading/Excavation	0.00	0.00	0.00	0.00	0.00	0.00
Tons per const. Period - Grading/Excavation	0.00	0.00	0.00	0.00	0.00	0.00
Pounds per day - Drainage/Utilities/Sub-Grade	0.00	0.00	0.03	0.01	0.00	0.00
Tons per const. Period - Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00
Pounds per day - Paving	0.02	0.19	1.45	0.05	0.02	0.01
Tons per const. Period - Paving	0.00	0.00	0.00	0.00	0.00	0.00
Total tons per construction project	0.00	0.00	0.00	0.00	0.00	0.00

Note: Worker commute default values can be overridden in cells D121 through D126.

Worker Commute Emissions		User Override of Worker Commute Default Values		Default Values		Calculated Daily Trips	Calculated Daily VMT
User Input							
Miles/ one-way trip		2		20			
One-way trips/day		5		10		200.00	
No. of employees: Grubbing/Land Clearing		20		40		800.00	
No. of employees: Grading/Excavation		14		28		560.00	
No. of employees: Paving		10		20		400.00	
Emission Rates							
	ROG	CO	Nox	PM10	PM2.5	SOx	CO2
Grubbing/Land Clearing (grams/mile)	0.02	1.22	0.11	0.05	0.02	0.00	350.90
Grading/Excavation (grams/mile)	0.02	1.22	0.11	0.05	0.02	0.00	350.90
Drainage/Utilities/Sub-Grade (grams/mile)	0.02	1.22	0.11	0.05	0.02	0.00	350.90
Paving (grams/mile)	0.02	1.22	0.11	0.05	0.02	0.00	350.90
Grubbing/Land Clearing (grams/trip)	1.25	3.05	0.37	0.00	0.00	0.00	75.08
Grading/Excavation (grams/trip)	1.25	3.05	0.37	0.00	0.00	0.00	75.08
Drainage/Utilities/Sub-Grade (grams/trip)	1.25	3.05	0.37	0.00	0.00	0.00	75.08
Paving (grams/trip)	1.25	3.05	0.37	0.00	0.00	0.00	75.08

Emissions	ROG	CO	NOx	PM10	PM2.5	SOx	CO2	CH4	N2O	CO2e
Pounds per day - Grubbing/Land Clearing	0.04	0.61	0.06	0.02	0.01	0.00	156.38	0.00	0.00	157.89
Tons per const. Period - Grubbing/Land Clearing	0.00	0.01	0.00	0.00	0.00	0.00	1.94	0.00	0.00	1.96
Pounds per day - Grading/Excavation	0.15	2.42	0.23	0.08	0.03	0.01	625.51	0.02	0.02	631.66
Tons per const. Period - Grading/Excavation	0.00	0.02	0.00	0.00	0.00	0.00	6.19	0.00	0.00	6.25
Pounds per day - Drainage/Utilities/Sub-Grade	0.11	1.70	0.16	0.06	0.02	0.00	437.85	0.01	0.01	442.09
Tons per const. Period - Drainage/Utilities/Sub-Grade	0.00	0.01	0.00	0.00	0.00	0.00	2.65	0.00	0.00	2.67
Pounds per day - Paving	0.08	1.21	0.12	0.04	0.02	0.00	312.75	0.01	0.01	315.78
Tons per const. Period - Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.15	0.00	0.00	0.16
Total tons per construction project	0.00	0.04	0.00	0.00	0.00	0.00	10.94	0.00	0.00	11.05

Note: Water Truck default values can be overridden in cells D153 through D156, H153 through H156, and F153 through F156.

Water Truck Emissions		User Override of	Program Estimate of	User Override of Truck	Default Values	Calculated	User Override of	Default Values	Calculated
User Input		Default # Water Trucks	Number of Water Trucks	Round Trips/Vehicle/Day	Round Trips/Vehicle/Day	Trips/day	Miles/Round Trip	Miles/Round Trip	Daily VMT
Grubbing/Land Clearing - Exhaust		1			5	5		8.00	40.00
Grading/Excavation - Exhaust		1			5	5		8.00	40.00
Drainage/Utilities/Subgrade		1			5	5		8.00	40.00
Paving		1			5	5		8.00	40.00

Emission Rates	ROG	CO	NOx	PM10	PM2.5	SOx	CO2	CH4	N2O	CO2e
Grubbing/Land Clearing (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02	1,801.75	0.00	0.28	1,886.20
Grading/Excavation (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02	1,801.75	0.00	0.28	1,886.20
Drainage/Utilities/Sub-Grade (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02	1,801.75	0.00	0.28	1,886.20
Paving (grams/mile)	0.04	0.42	3.03	0.11	0.05	0.02	1,801.75	0.00	0.28	1,886.20
Grubbing/Land Clearing (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grading/Excavation (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Drainage/Utilities/Sub-Grade (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paving (grams/trip)	0.00	0.00	3.31	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Emissions	ROG	CO	NOx	PM10	PM2.5	SOx	CO2	CH4	N2O	CO2e
Pounds per day - Grubbing/Land Clearing	0.00	0.04	0.30	0.01	0.00	0.00	158.89	0.00	0.02	166.33
Tons per const. Period - Grubbing/Land Clearing	0.00	0.00	0.00	0.00	0.00	0.00	1.97	0.00	0.00	2.07
Pounds per day - Grading/Excavation	0.00	0.04	0.30	0.01	0.00	0.00	158.89	0.00	0.02	166.33
Tons per const. Period - Grading/Excavation	0.00	0.00	0.00	0.00	0.00	0.00	1.57	0.00	0.00	1.65
Pounds per day - Drainage/Utilities/Sub-Grade	0.00	0.04	0.30	0.01	0.00	0.00	158.89	0.00	0.02	166.33
Tons per const. Period - Drainage/Utilities/Sub-Grade	0.00	0.00	0.00	0.00	0.00	0.00	0.96	0.00	0.00	1.01
Pounds per day - Paving	0.00	0.04	0.30	0.01	0.00	0.00	158.89	0.00	0.02	166.33
Tons per const. Period - Paving	0.00	0.00	0.00	0.00	0.00	0.00	0.08	0.00	0.00	0.08
Total tons per construction project	0.00	0.00	0.01	0.00	0.00	0.00	4.59	0.00	0.00	4.80

Note: Fugitive dust default values can be overridden in cells D183 through D185.

Fugitive Dust	User Override of Max	Default	PM10	PM10	PM2.5	PM2.5
	Acreage Disturbed/Day	Maximum Acreage/Day	pounds/day	tons/per period	pounds/day	tons/per period
Fugitive Dust - Grubbing/Land Clearing		0.01	0.10	0.00	0.02	0.00
Fugitive Dust - Grading/Excavation		0.01	0.10	0.00	0.02	0.00
Fugitive Dust - Drainage/Utilities/Subgrade		0.01	0.10	0.00	0.02	0.00

			Model Default Tier	Scrapers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
0.00	1		Model Default Tier	Signal Boards	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
			Model Default Tier	Skid Steer Loaders	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
			Model Default Tier	Surfacing Equipment	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
			Model Default Tier	Sweepers/Scrubbers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
1.00	3		Model Default Tier	Tractors/Loaders/Backhoes	0.21	2.28	2.11	0.13	0.12	0.00	300.77	0.10	0.00	0.00	304.01	
			Model Default Tier	Trenchers	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
			Model Default Tier	Welders	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
User-Defined Off-road Equipment																
If non-default vehicles are used, please provide information in 'Non-default Off-road Equipment' tab																
Number of Vehicles		Equipment Tier		Type	ROG	CO	NOx	PM10	PM2.5	SOx	CO2	CH4	N2O	CO2e		
					pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	pounds/day	
0.00			NA		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
0.00			NA		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
0.00			NA		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
0.00			NA		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
0.00			NA		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
0.00			NA		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
0.00			NA		0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
				Paving	pounds per day	0.73	8.19	7.58	0.41	0.38	0.01	1,214.09	0.39	0.01	1,227.17	
				Paving	tons per phase	0.00	0.00	0.00	0.00	0.00	0.00	0.60	0.00	0.00	0.61	
Total Emissions all Phases (tons per construction period) =>						0.04	0.29	0.45	0.02	0.02	0.00	56.03	0.02	0.00	56.62	

Equipment default values for horsepower and hours/day can be overridden in cells D403 through D436 and F403 through F436.

Equipment	User Override of Horsepower	Default Values Horsepower	User Override of Hours/day	Default Values Hours/day
Aerial Lifts		63		8
Air Compressors		78	4.00	8
Bore/Drill Rigs		221		8
Cement and Mortar Mixers		9		8
Concrete/Industrial Saws		81		8
Cranes		231	6.00	8
Crawler Tractors		212		8
Crushing/Proc. Equipment		85		8
Excavators		159		8
Forklifts		89		8
Generator Sets		84		8
Graders		187		8
Off-Highway Tractors		124		8
Off-Highway Trucks		402	6.00	8
Other Construction Equipment		172		8
Other General Industrial Equipment		88		8
Other Material Handling Equipment		168		8
Pavers		130		8
Paving Equipment		132		8
Plate Compactors		8		8
Pressure Washers		13		8
Pumps		84		8
Rollers		80	2.00	8
Rough Terrain Forklifts		100		8
Rubber Tired Dozers		247		8
Rubber Tired Loaders		203		8
Scrapers		367		8
Signal Boards		6		8
Skid Steer Loaders		65		8
Surfacing Equipment		283		8
Sweepers/Scrubbers		64		8
Tractors/Loaders/Backhoes		97		8
Trenchers		78		8
Welders		46		8

END OF DATA ENTRY SHEET

Attachment 2: Health Risk Calculation Methodology

A health risk assessment (HRA) for exposure to Toxic Air Contaminates (TACs) requires the application of a risk characterization model to the results from the air dispersion model to estimate potential health risk at each sensitive receptor location. The State of California Office of Environmental Health Hazard Assessment (OEHHA) and California Air Resources Board (CARB) develop recommended methods for conducting health risk assessments. The most recent OEHHA risk assessment guidelines were published in February of 2015.⁵ These guidelines incorporate substantial changes designed to provide for enhanced protection of children, as required by State law, compared to previous published risk assessment guidelines. CARB has provided additional guidance on implementing OEHHA's recommended methods.⁶ This HRA used the 2015 OEHHA risk assessment guidelines and CARB guidance. The BAAQMD has adopted recommended procedures for applying the newest OEHHA guidelines as part of Regulation 2, Rule 5: New Source Review of Toxic Air Contaminants.⁷ Exposure parameters from the OEHHA guidelines and the recent BAAQMD HRA Guidelines were used in this evaluation.

Cancer Risk

Potential increased cancer risk from inhalation of TACs are calculated based on the TAC concentration over the period of exposure, inhalation dose, the TAC cancer potency factor, and an age sensitivity factor to reflect the greater sensitivity of infants and children to cancer causing TACs. The inhalation dose depends on a person's breathing rate, exposure time and frequency and duration of exposure. These parameters vary depending on the age, or age range, of the persons being exposed and whether the exposure is considered to occur at a residential location or other sensitive receptor location.

The current OEHHA guidance recommends that cancer risk be calculated by age groups to account for different breathing rates and sensitivity to TACs. Specifically, they recommend evaluating risks for the third trimester of pregnancy to age zero, ages zero to less than two (infant exposure), ages two to less than 16 (child exposure), and ages 16 to 70 (adult exposure). Age sensitivity factors (ASFs) associated with the different types of exposure are an ASF of 10 for the third trimester and infant exposures, an ASF of 3 for a child exposure, and an ASF of 1 for an adult exposure. Also associated with each exposure type are different breathing rates, expressed as liters per kilogram of body weight per day (L/kg-day). As recommended by the BAAQMD for residential exposures, 95th percentile breathing rates are used for the third trimester and infant exposures, and 80th percentile breathing rates for child and adult exposures. For children at schools and daycare facilities, BAAQMD recommends using the 95th percentile breathing rates. Additionally, CARB and the BAAQMD recommend the use of a residential exposure duration of 30 years for sources with long-term emissions (e.g., roadways). For workers, assumed to be adults,

5 OEHHA, 2015. *Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. Office of Environmental Health Hazard Assessment. February.

6 CARB, 2015. *Risk Management Guidance for Stationary Sources of Air Toxics*. July 23.

7 BAAQMD, 2016. *BAAQMD Air Toxics NSR Program Health Risk Assessment (HRA) Guidelines*. December 2016.

a 25-year exposure period is recommended by the BAAQMD.

Under previous OEHHA and BAAQMD HRA guidance, residential receptors are assumed to be at their home 24 hours a day, or 100 percent of the time. In the 2015 Risk Assessment Guidance, OEHHA includes adjustments to exposure duration to account for the fraction of time at home (FAH), which can be less than 100 percent of the time, based on updated population and activity statistics. The FAH factors are age-specific and are: 0.85 for third trimester of pregnancy to less than 2 years old, 0.72 for ages 2 to less than 16 years, and 0.73 for ages 16 to 70 years. Use of the FAH factors is allowed by the BAAQMD if there are no schools in the project vicinity that would have a cancer risk of one in a million or greater assuming 100 percent exposure (FAH = 1.0).

Functionally, cancer risk is calculated using the following parameters and formulas:

$$\text{Cancer Risk (per million)} = CPF \times \text{Inhalation Dose} \times ASF \times ED/AT \times FAH \times 10^6$$

Where:

- CPF = Cancer potency factor (mg/kg-day)⁻¹
- ASF = Age sensitivity factor for specified age group
- ED = Exposure duration (years)
- AT = Averaging time for lifetime cancer risk (years)
- FAH = Fraction of time spent at home (unitless)

$$\text{Inhalation Dose} = C_{\text{air}} \times DBR \times A \times (EF/365) \times 10^{-6}$$

Where:

- C_{air} = concentration in air (µg/m³)
- DBR = daily breathing rate (L/kg body weight-day)
- A = Inhalation absorption factor
- EF = Exposure frequency (days/year)
- 10⁻⁶ = Conversion factor

The health risk parameters used in this evaluation are summarized as follows:

Parameter	Exposure Type →	Infant		Child		Adult
	Age Range →	3 rd Trimester	0<2	2 < 9	2 < 16	16 - 30
DPM Cancer Potency Factor (mg/kg-day) ⁻¹		1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
Daily Breathing Rate (L/kg-day) 80 th Percentile Rate		273	758	631	572	261
Daily Breathing Rate (L/kg-day) 95 th Percentile Rate		361	1,090	861	745	335
Inhalation Absorption Factor		1	1	1	1	1
Averaging Time (years)		70	70	70	70	70
Exposure Duration (years)		0.25	2	14	14	14
Exposure Frequency (days/year)		350	350	350	350	350
Age Sensitivity Factor		10	10	3	3	1
Fraction of Time at Home		0.85-1.0	0.85-1.0	0.72-1.0	0.72-1.0	0.73

Non-Cancer Hazards

Potential non-cancer health hazards from TAC exposure are expressed in terms of a hazard index (HI), which is the ratio of the TAC concentration to a reference exposure level (REL). OEHHA has defined acceptable concentration levels for contaminants that pose non-cancer health hazards. TAC concentrations below the REL are not expected to cause adverse health impacts, even for sensitive individuals. The total HI is calculated as the sum of the HIs for each TAC evaluated and the total HI is compared to the BAAQMD significance thresholds to determine whether a significant non-cancer health impact from a project would occur.

Typically, for residential projects located near roadways with substantial TAC emissions, the primary TAC of concern with non-cancer health effects is diesel particulate matter (DPM). For DPM, the chronic inhalation REL is 5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$).

Annual PM_{2.5} Concentrations

While not a TAC, fine particulate matter (PM_{2.5}) has been identified by the BAAQMD as a pollutant with potential non-cancer health effects that should be included when evaluating potential community health impacts under the California Environmental Quality Act (CEQA). The thresholds of significance for PM_{2.5} (project level and cumulative) are in terms of an increase in the annual average concentration. When considering PM_{2.5} impacts, the contribution from all sources of PM_{2.5} emissions should be included. For projects with potential impacts from nearby local roadways, the PM_{2.5} impacts should include those from vehicle exhaust emissions, PM_{2.5} generated from vehicle tire and brake wear, and fugitive emissions from re-suspended dust on the roads.

Attachment 3: Construction Health Risk Calculations

University Plaza & Ramp Realignment, East Palo Alto, CA

University Plaza DPM Emissions and Modeling Emission Rates - Unmitigated

Emissions Model	Activity	DPM (ton/year)	Area Source	DPM Emissions			Modeled Area (m ²)	DPM Emission Rate (g/s/m ²)
				(lb/yr)	(lb/hr)	(g/s)		
2020	Construction	0.0245	DPM	49.0	0.01492	1.88E-03	10,287	1.83E-07
2021	Construction	0.0032	DPM	6.4	0.00195	2.45E-04	10,287	2.39E-08
Total		0.0277		55.4	0.0169	0.0021		

Operation Hours

hr/day = 9 (7am - 4pm)
 days/yr = 365
 hours/year = 3285

University Plaza PM2.5 Fugitive Dust Emissions for Modeling - Unmitigated

Construction Year	Activity	Area Source	Area (ton/year)	PM2.5 Emissions			Modeled Area (m ²)	PM2.5 Emission Rate (g/s/m ²)
				(lb/yr)	(lb/hr)	(g/s)		
2018	Construction	FUG	0.0424	84.8	0.02581	3.25E-03	10,287	3.16E-07
2019	Construction	FUG	0.0073	14.7	0.00446	5.62E-04	10,287	5.47E-08
Total			0.0497	99.5	0.0303	0.0038		

Operation Hours

hr/day = 9 (7am - 4pm)
 days/yr = 365
 hours/year = 3285

On-Ramp DPM Construction Emissions and Modeling Emission Rates - Unmitigated

Construction Year	Activity	DPM (ton/year)	Area Source	DPM Emissions			Modeled Area (m ²)	DPM Emission Rate (g/s/m ²)
				(lb/yr)	(lb/hr)	(g/s)		
2020	DPM_ROAD	0.0207	CON1_DPM	41.5	0.01263	1.59E-03	2,849	5.59E-07
	DPM_RAMP	0.0049	CON2_DPM	9.9	0.00301	3.79E-04	679	5.59E-07
		<u>0.0257</u>					<u>3,528</u>	
Total		0.0257		51	0.0156	0.0020		

hr/day = 9 (7am - 4pm)
days/yr = 365
hours/year = 3285

On-Ramp PM2.5 Fugitive Dust Construction Emissions for Modeling - Unmitigated

Construction Year	Activity	Area Source	PM2.5 Emissions (ton/year)	PM2.5 Emissions			Modeled Area (m ²)	PM2.5 Emission Rate g/s/m ²
				(lb/yr)	(lb/hr)	(g/s)		
2020	FUG_ROAD	CON1_FUG	0.0005	1.0	0.00029	3.66E-05	2,849	1.28E-08
	FUG_RAMP	CON2_FUG	0.0001	0.2	0.00007	8.72E-06	679	1.28E-08
			<u>0.0006</u>				<u>3,528</u>	
Total			0.0006	1.2	0.0004	0.0000		

hr/day = 9 (7am - 4pm)
days/yr = 365
hours/year = 3285

**University Plaza & Ramp Realignment, East Palo Alto, CA
Construction Health Impacts Summary**

Maximum Impacts at Construction MEI Location - Unmitigated

Emissions Year	Maximum Concentrations		Cancer Risk (per million)		Hazard Index (-)	Maximum Annual PM2.5 Concentration ($\mu\text{g}/\text{m}^3$)
	Exhaust PM10/DPM ($\mu\text{g}/\text{m}^3$)	Fugitive PM2.5 ($\mu\text{g}/\text{m}^3$)	Child	Adult		
	2020	0.0629	0.0241	11.19	0.18	0.013
2021	0.0017	0.0039	0.27	0.00	0.000	0.01
Total	-	-	11.5	0.2	-	-
Maximum	0.0629	0.0241	-	-	0.013	0.09

**University Plaza & Ramp Realignment, East Palo Alto, CA - Unmitigated Emissions
Maximum DPM Cancer Risk Calculations From Construction
Impacts at Off-Site Receptors-1.5 meter receptor height**

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)⁻¹
 ASF = Age sensitivity factor for specified age group
 ED = Exposure duration (years)
 AT = Averaging time for lifetime cancer risk (years)
 FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10⁻⁶

Where: C_{air} = concentration in air (µg/m³)
 DBR = daily breathing rate (L/kg body weight-day)
 A = Inhalation absorption factor
 EF = Exposure frequency (days/year)
 10⁻⁶ = Conversion factor

Values

Age --> Parameter	Infant/Child				Adult
	3rd Trimester	0 - 2	2 - 9	2 - 16	16 - 30
ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	631	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and 80th percentile for children and adults

Construction Cancer Risk by Year - Maximum Impact Receptor Location

Exposure Year	Exposure Duration (years)	Age	Infant/Child - Exposure Information			Infant/Child Cancer Risk (per million)	Adult - Exposure Information			Adult Cancer Risk (per million)	Fugitive PM2.5	Total PM2.5
			DPM Conc (ug/m3)		Age Sensitivity		Modeled		Age Sensitivity			
			Year	Annual	Factor		Year	Annual	Factor			
0	0.25	-0.25 - 0*	2020	0.0629	10	0.86	2020	0.0629	-	-		
1	1	0 - 1	2020	0.0629	10	10.34	2020	0.0629	1	0.18	0.0241	0.0871
2	1	1 - 2	2021	0.0017	10	0.27	2021	0.0017	1	0.00	0.0039	0.0056
3	1	2 - 3		0.0000	3	0.00		0.0000	1	0.00		
4	1	3 - 4		0.0000	3	0.00		0.0000	1	0.00		
5	1	4 - 5		0.0000	3	0.00		0.0000	1	0.00		
6	1	5 - 6		0.0000	3	0.00		0.0000	1	0.00		
7	1	6 - 7		0.0000	3	0.00		0.0000	1	0.00		
8	1	7 - 8		0.0000	3	0.00		0.0000	1	0.00		
9	1	8 - 9		0.0000	3	0.00		0.0000	1	0.00		
10	1	9 - 10		0.0000	3	0.00		0.0000	1	0.00		
11	1	10 - 11		0.0000	3	0.00		0.0000	1	0.00		
12	1	11 - 12		0.0000	3	0.00		0.0000	1	0.00		
13	1	12 - 13		0.0000	3	0.00		0.0000	1	0.00		
14	1	13 - 14		0.0000	3	0.00		0.0000	1	0.00		
15	1	14 - 15		0.0000	3	0.00		0.0000	1	0.00		
16	1	15 - 16		0.0000	3	0.00		0.0000	1	0.00		
17	1	16-17		0.0000	1	0.00		0.0000	1	0.00		
18	1	17-18		0.0000	1	0.00		0.0000	1	0.00		
19	1	18-19		0.0000	1	0.00		0.0000	1	0.00		
20	1	19-20		0.0000	1	0.00		0.0000	1	0.00		
21	1	20-21		0.0000	1	0.00		0.0000	1	0.00		
22	1	21-22		0.0000	1	0.00		0.0000	1	0.00		
23	1	22-23		0.0000	1	0.00		0.0000	1	0.00		
24	1	23-24		0.0000	1	0.00		0.0000	1	0.00		
25	1	24-25		0.0000	1	0.00		0.0000	1	0.00		
26	1	25-26		0.0000	1	0.00		0.0000	1	0.00		
27	1	26-27		0.0000	1	0.00		0.0000	1	0.00		
28	1	27-28		0.0000	1	0.00		0.0000	1	0.00		
29	1	28-29		0.0000	1	0.00		0.0000	1	0.00		
30	1	29-30		0.0000	1	0.00		0.0000	1	0.00		
Total Increased Cancer Risk						11.5				0.19		

* Third trimester of pregnancy

**University Plaza & Ramp Realignm - Unmitigated Emissions
Maximum DPM Cancer Risk Calculations From Construction
Impacts at Off-Site Receptors-4.5 meter**

Cancer Risk (per million) = CPF x Inhalation Dose x ASF x ED/AT x FAH x 1.0E6

Where: CPF = Cancer potency factor (mg/kg-day)⁻¹
 ASF = Age sensitivity factor for specified age group
 ED = Exposure duration (years)
 AT = Averaging time for lifetime cancer risk (years)
 FAH = Fraction of time spent at home (unitless)

Inhalation Dose = C_{air} x DBR x A x (EF/365) x 10⁻⁶

Where: C_{air} = concentration in air (µg/m³)
 DBR = daily breathing rate (L/kg body weight-day)
 A = Inhalation absorption factor
 EF = Exposure frequency (days/year)
 10⁻⁶ = Conversion factor

Values

Age --> Parameter	Infant/Child				Adult
	3rd Trimester	0 - 2	2 - 9	2 - 16	16 - 30
ASF =	10	10	3	3	1
CPF =	1.10E+00	1.10E+00	1.10E+00	1.10E+00	1.10E+00
DBR* =	361	1090	631	572	261
A =	1	1	1	1	1
EF =	350	350	350	350	350
AT =	70	70	70	70	70
FAH =	1.00	1.00	1.00	1.00	0.73

* 95th percentile breathing rates for infants and 80th percentile for children and adults

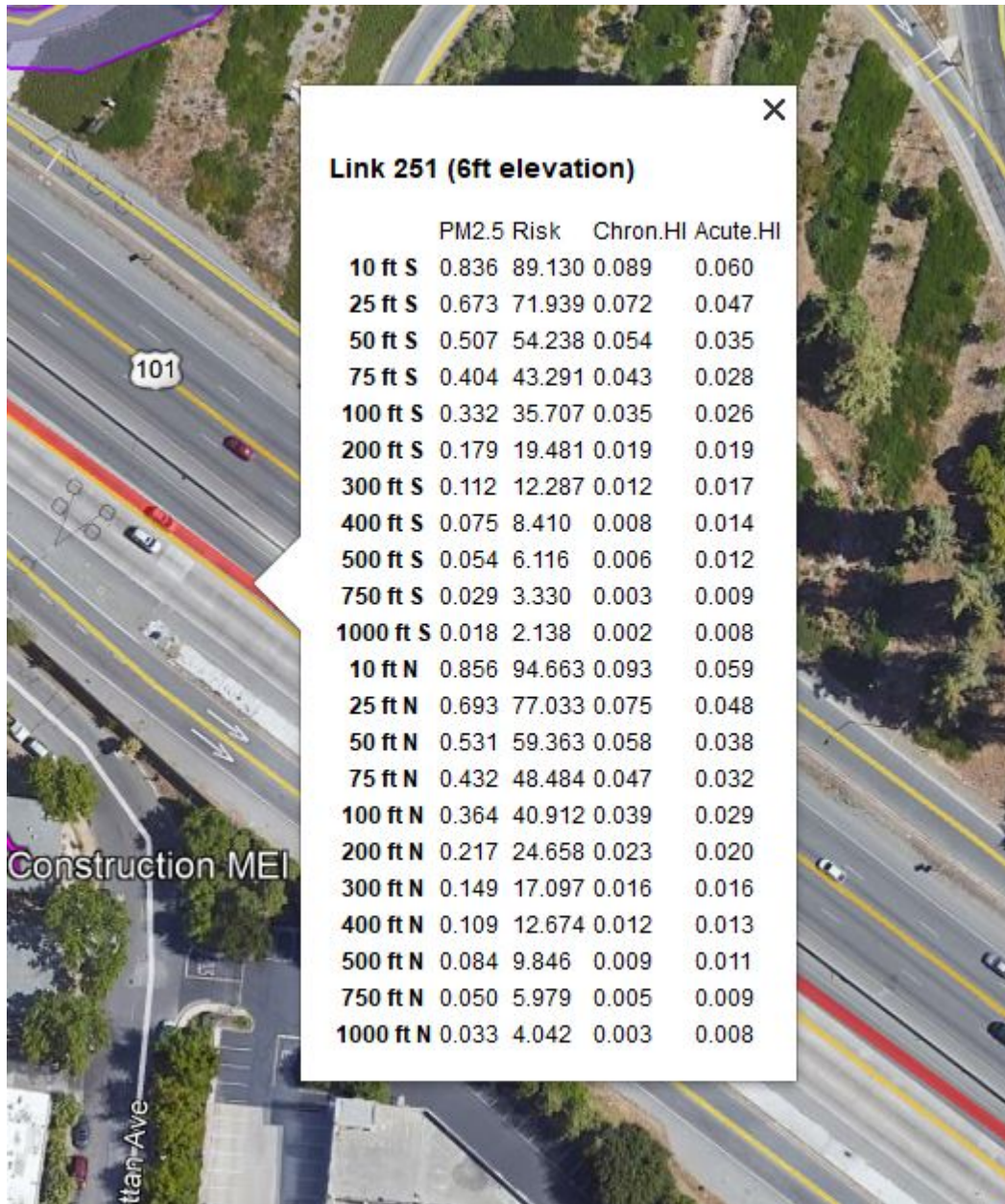
Construction Cancer Risk by Year - Maximum Impact Receptor Location

Exposure Year	Exposure Duration (years)	Age	Infant/Child - Exposure Information			Infant/Child Cancer Risk (per million)	Adult - Exposure Information			Adult Cancer Risk (per million)	Fugitive PM2.5	Total PM2.5
			DPM Conc (ug/m3)		Age Sensitivity Factor		Modeled		Age Sensitivity Factor			
			Year	Annual			Year	Annual				
0	0.25	-0.25 - 0*	2020	0.0582	10	0.82	2020	0.0582	-	-		
1	1	0 - 1	2020	0.0582	10	9.55	2020	0.0582	1	0.17	0.0582	0.116
2	1	1 - 2	2021	0.0015	10	0.25	2021	0.0015	1	0.00	0.0037	0.005
3	1	2 - 3		0.0000	3	0.00		0.0000	1	0.00		
4	1	3 - 4		0.0000	3	0.00		0.0000	1	0.00		
5	1	4 - 5		0.0000	3	0.00		0.0000	1	0.00		
6	1	5 - 6		0.0000	3	0.00		0.0000	1	0.00		
7	1	6 - 7		0.0000	3	0.00		0.0000	1	0.00		
8	1	7 - 8		0.0000	3	0.00		0.0000	1	0.00		
9	1	8 - 9		0.0000	3	0.00		0.0000	1	0.00		
10	1	9 - 10		0.0000	3	0.00		0.0000	1	0.00		
11	1	10 - 11		0.0000	3	0.00		0.0000	1	0.00		
12	1	11 - 12		0.0000	3	0.00		0.0000	1	0.00		
13	1	12 - 13		0.0000	3	0.00		0.0000	1	0.00		
14	1	13 - 14		0.0000	3	0.00		0.0000	1	0.00		
15	1	14 - 15		0.0000	3	0.00		0.0000	1	0.00		
16	1	15 - 16		0.0000	3	0.00		0.0000	1	0.00		
17	1	16-17		0.0000	1	0.00		0.0000	1	0.00		
18	1	17-18		0.0000	1	0.00		0.0000	1	0.00		
19	1	18-19		0.0000	1	0.00		0.0000	1	0.00		
20	1	19-20		0.0000	1	0.00		0.0000	1	0.00		
21	1	20-21		0.0000	1	0.00		0.0000	1	0.00		
22	1	21-22		0.0000	1	0.00		0.0000	1	0.00		
23	1	22-23		0.0000	1	0.00		0.0000	1	0.00		
24	1	23-24		0.0000	1	0.00		0.0000	1	0.00		
25	1	24-25		0.0000	1	0.00		0.0000	1	0.00		
26	1	25-26		0.0000	1	0.00		0.0000	1	0.00		
27	1	26-27		0.0000	1	0.00		0.0000	1	0.00		
28	1	27-28		0.0000	1	0.00		0.0000	1	0.00		
29	1	28-29		0.0000	1	0.00		0.0000	1	0.00		
30	1	29-30		0.0000	1	0.00		0.0000	1	0.00		
Total Increased Cancer Risk						10.6				0.17		

* Third trimester of pregnancy

Attachment 4: Screening Health Risk Calculations

BAAQMD Highway Google Earth Screening Tool: Highway 101



Google Earth Data											Construction MEI			
Distance from Receptor (feet) or MEI ¹	Facility Name	Address	Plant No.	Cancer Risk ²	Hazard Risk ²	PM _{2.5} ²	Source No. ³	Type of Source ⁴	Fuel Code ⁵	Status/Comments	Distance Adjustment Multiplier	Adjusted Cancer Risk Estimate	Adjusted Hazard Risk	Adjusted PM _{2.5}
1000	East Palo Alto Shell	2194 University Ave	109055	22.13863284	0.1093			Gas Dispensing Facility			0.01	0.3	0.002	
660	CHEVRON SS #9-1081	2101 University Ave	110033	91.996	0.4542			Gas Dispensing Facility			0.03	2.7	0.013	
590	Ravenswood City School District	2160 Euclid Ave	100157	10.594	0.0523			Gas Dispensing Facility			0.03	0.4	0.002	
1000	IKEA California LLC	1700 E Bayshore Road	15292	112.439	0.0584	0.146511252		Generator			0.04	4.5	0.002	0.01
400	Four Seasons Hotel	2050 University Avenue	16212	2.932	0.0050	0.0037		Generator			0.16	0.5	0.001	0.001

How to Use the Distance Adjustment Multiplier Tool for Gasoline Dispensing Facilities (GDF)

This distance multiplier tool refines the screening values for cancer risk and chronic hazard index found in the District's Stationary Source Screening Analysis Tool to represent adjusted risk and hazard impacts that can be expected with farther distances from the source of emissions (GDF's).

1. Obtain the GDF cancer risk and/or chronic hazard index from the District's Stationary Source Screening Analysis tool for facilities where the Plant No. is preceded with a 'G'. If the distance to the nearest receptor is less than 20 meters, the distance adjustment multiplier table cannot be used and an air dispersion modeling analysis using site-specific information is needed to refine the cancer risk and/or chronic hazard index estimate.

2. Determine the shortest distance from the GDF to the nearest receptor.

3. In the table below, enter the cancer risk and/or chronic hazard index found in step 1 for the GDF in the row which aligns with the shortest distance from each GDF to the nearest receptor (found in step 2). If the shortest distance to the receptor falls between two distance values, select the multiplier corresponding to the smaller distance. For distances beyond 300 meters, use the multiplier 0.015. The resulting product is the adjusted cancer risk in a million or the adjusted chronic hazard index for the GDF.

Note: These distance adjustment multipliers may be used only for the screening level health risk values indicated in the District's Stationary Source Screening Analysis tool for gasoline dispensing facilities. This distance multiplier tool may not be used to adjust values from an HRA if an HRA for the facility was conducted.

Distance meters	Distance feet	Distance adjustment multiplier	Enter Cancer Risk	Adjusted Cancer Risk	Enter Chronic Hazard Index	Adjusted Chronic Hazard Index
20	66	1.000		0		0
25	82	0.728		0		0
30	98	0.559		0		0
35	115	0.445		0		0
40	131	0.365		0		0
45	148	0.305		0		0
50	164	0.260		0		0
55	180	0.225		0		0
60	197	0.197		0		0
65	213	0.174		0		0
70	230	0.155		0		0
75	246	0.139		0		0
80	262	0.126		0		0
85	279	0.114		0		0
90	295	0.104		0		0
95	312	0.096		0		0
100	328	0.088		0		0
105	344	0.082		0		0
110	361	0.076		0		0
115	377	0.071		0		0
120	394	0.066		0		0
125	410	0.062		0		0
130	426	0.058		0		0
135	443	0.055		0		0
140	459	0.052		0		0
145	476	0.049		0		0
150	492	0.046		0		0
155	508	0.044		0		0
160	525	0.042		0		0
165	541	0.040		0		0
170	558	0.038		0		0
175	574	0.036		0		0
180	590	0.034		0		0
185	607	0.033		0		0
190	623	0.031		0		0
195	640	0.030		0		0
200	656	0.029		0		0
205	672	0.028		0		0
210	689	0.027		0		0
215	705	0.026		0		0
220	722	0.025		0		0
225	738	0.024		0		0
230	754	0.023		0		0
235	771	0.022		0		0
240	787	0.022		0		0
245	804	0.021		0		0
250	820	0.020		0		0
255	836	0.020		0		0
260	853	0.019		0		0
265	869	0.018		0		0
270	886	0.018		0		0
275	902	0.017		0		0
280	918	0.017		0		0
285	935	0.016		0		0
290	951	0.016		0		0
295	968	0.015		0		0
300	984	0.015		0		0

How to Use the Distance Adjustment Multiplier Tool for Diesel Internal Combustion (IC) Engines

This distance multiplier tool refines the screening values for cancer risk and PM2.5 concentrations found in the District's Stationary Source Screening Analysis Tool for permitted facilities which contain only diesel IC engines, to represent adjusted risk and hazard impacts that can be expected with farther distances from the source of emissions.

1. Obtain the facility diesel IC engine(s) cancer risk and/or PM2.5 concentration from the District's Stationary Source Screening Analysis tool only for facilities where the source is listed as "generator." If the distance to the nearest receptor is less than 25 meters, the distance adjustment multiplier table cannot be used and an air dispersion modeling analysis using site-specific information is needed to refine the cancer risk, chronic hazard index or PM2.5 estimates.
2. Determine the shortest distance from each diesel IC engine to the nearest receptor. Select the shortest distance to receptor found.
3. In the table below, enter the cancer risk and/or PM2.5 concentration found in step 1 for the diesel IC engine in the row which aligns with the shortest distance from each diesel IC engine to the nearest receptor (found in step 2). If the shortest distance to the receptor falls between two distance values, select the multiplier corresponding to the smaller distance. For distances beyond 280 meters, use the multiplier 0.04. The resulting product is the adjusted cancer risk in a million or the adjusted PM2.5 concentration for the diesel IC engine

Note: This distance adjustment multiplier may be used only for the screening level health risk values indicated in the District's Stationary Source Screening Analysis tool for diesel IC engines. This distance multiplier tool may not be used to adjust values from an HRA if an HRA for the facility was conducted.

Note: This distance adjustment multiplier may also be used to adjust the screening values for chronic hazard index found in the District's Stationary Source Screening Analysis Tool for facilities with only diesel IC engines.

Distance (meters)	Distance (feet)	Distance Adjustment Multiplier	Enter Cancer Risk Estimate	Adjusted Cancer Risk Estimate	Enter PM2.5 Concentration	Adjusted PM2.5 Concentration
25	82	0.85		0		0
30	98.4	0.73		0		0
35	115	0.64		0		0
40	131	0.58		0		0
50	164	0.5		0		0
60	197	0.41		0		0
70	230	0.31		0		0
80	262	0.28		0		0
90	295	0.25		0		0
100	328	0.22		0		0
110	361	0.18		0		0
120	394	0.16		0		0
130	426	0.15		0		0
140	459	0.14		0		0
150	492	0.12		0		0
160	525	0.1		0		0
180	590	0.09		0		0
200	656	0.08		0		0
220	722	0.07		0		0
240	787	0.06		0		0
260	853	0.05		0		0
280	918	0.04		0		0

Roadway Screening Analysis Calculator

County specific tables containing estimates of risk and hazard impacts from roadways in the Bay Area.

INSTRUCTIONS:

Input the site-specific characteristics of your project by using the drop down menu in the "Search Parameter" box. We recommend that this analysis be used for roadways with 10,000 AADT and above.

- **County:** Select the County where the project is located. The calculator is only applicable for projects within the nine Bay Area counties.
- **Roadway Direction:** Select the orientation that best matches the roadway. If the roadway orientation is neither clearly north-south nor east-west, use the highest values predicted from either orientation.
- **Side of the Roadway:** Identify on which side of the roadway the project is located.
- **Distance from Roadway:** Enter the distance in feet from the nearest edge of the roadway to the project site. The calculator estimates values for distances greater than 10 feet and less than 1000 feet. For distances greater than 1000 feet, the user can choose to extrapolate values using a distribution curve or apply 1000 feet values for greater distances.
- **Annual Average Daily Traffic (ADT):** Enter the annual average daily traffic on the roadway. These data may be collected from the city or the county (if the area is unincorporated).

When the user has completed the data entries, the screening level PM2.5 annual average concentration and the cancer risk results will appear in the Results Box on the right. Please note that the roadway tool is not applicable for California State Highways and the District refers the user to the Highway Screening Analysis Tool at: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>.

Notes and References listed below the Search Boxes

Search Parameters

County:

Roadway Direction:

Side of the Roadway:

Distance from Roadway: feet

Annual Average Daily Traffic (ADT):

Results

San Mateo County

EAST-WEST DIRECTIONAL ROADWAY

PM2.5 annual average

0.070 (µg/m³)

Cancer Risk

2.87 (per million)

Donohoe Street

Cumulative plus project volumes from traffic report
Data for San Mateo County based on meteorological data collected from San Mateo Sewage Treatment Plant in 2014

Adjusted for 2015 OEHHA
and EMFAC2014 for 2018

1.97

(per million)

Note that EMFAC2014 predicts DSL PM2.5 aggregate rates in 2018 that are 46% of EMFAC2011 for 2014. TOG gasoline rates are 56% of EMFAC2011 year 2014 rates. This is for light- and medium-duty vehicles traveling at 30 mph for Bay Area

Notes and References:

1. Emissions were developed using EMFAC2011 for fleet mix in 2014 assuming 10,000 AADT and includes impacts from diesel and gasoline vehicle exhaust, brake and tire wear, and resuspended dust.
2. Roadways were modeled using CALINE4 Cal3qhc air dispersion model assuming a source length of one kilometer. Meteorological data used to estimate the screening values are noted at the bottom of the "Results" box.
3. Cancer risks were estimated for 70 year lifetime exposure starting in 2014 that includes sensitivity values for early life exposures and OEHHA toxicity values adopted in 2013.

Roadway Screening Analysis Calculator

County specific tables containing estimates of risk and hazard impacts from roadways in the Bay Area.

INSTRUCTIONS:

Input the site-specific characteristics of your project by using the drop down menu in the "Search Parameter" box. We recommend that this analysis be used for roadways with 10,000 AADT and above.

- **County:** Select the County where the project is located. The calculator is only applicable for projects within the nine Bay Area counties.
- **Roadway Direction:** Select the orientation that best matches the roadway. If the roadway orientation is neither clearly north-south nor east-west, use the highest values predicted from either orientation.
- **Side of the Roadway:** Identify on which side of the roadway the project is located.
- **Distance from Roadway:** Enter the distance in feet from the nearest edge of the roadway to the project site. The calculator estimates values for distances greater than 10 feet and less than 1000 feet. For distances greater than 1000 feet, the user can choose to extrapolate values using a distribution curve or apply 1000 feet values for greater distances.
- **Annual Average Daily Traffic (ADT):** Enter the annual average daily traffic on the roadway. These data may be collected from the city or the county (if the area is unincorporated).

When the user has completed the data entries, the screening level PM2.5 annual average concentration and the cancer risk results will appear in the Results Box on the right. Please note that the roadway tool is not applicable for California State Highways and the District refers the user to the Highway Screening Analysis Tool at: <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Tools-and-Methodology.aspx>.

Notes and References listed below the Search Boxes

Search Parameters

County:

Roadway Direction:

Side of the Roadway:

Distance from Roadway: feet

Annual Average Daily Traffic (ADT):

Results

San Mateo County

NORTH-SOUTH DIRECTIONAL ROADWAY

PM2.5 annual average

0.042 ($\mu\text{g}/\text{m}^3$)

Cancer Risk

1.83 (per million)

University Avenue

Cumulative plus project volumes from traffic report
Data for San Mateo County based on meteorological data collected from San Mateo Sewage Treatment Plant in 2014

Adjusted for 2015 OEHHA
and EMFAC2014 for 2018

1.26

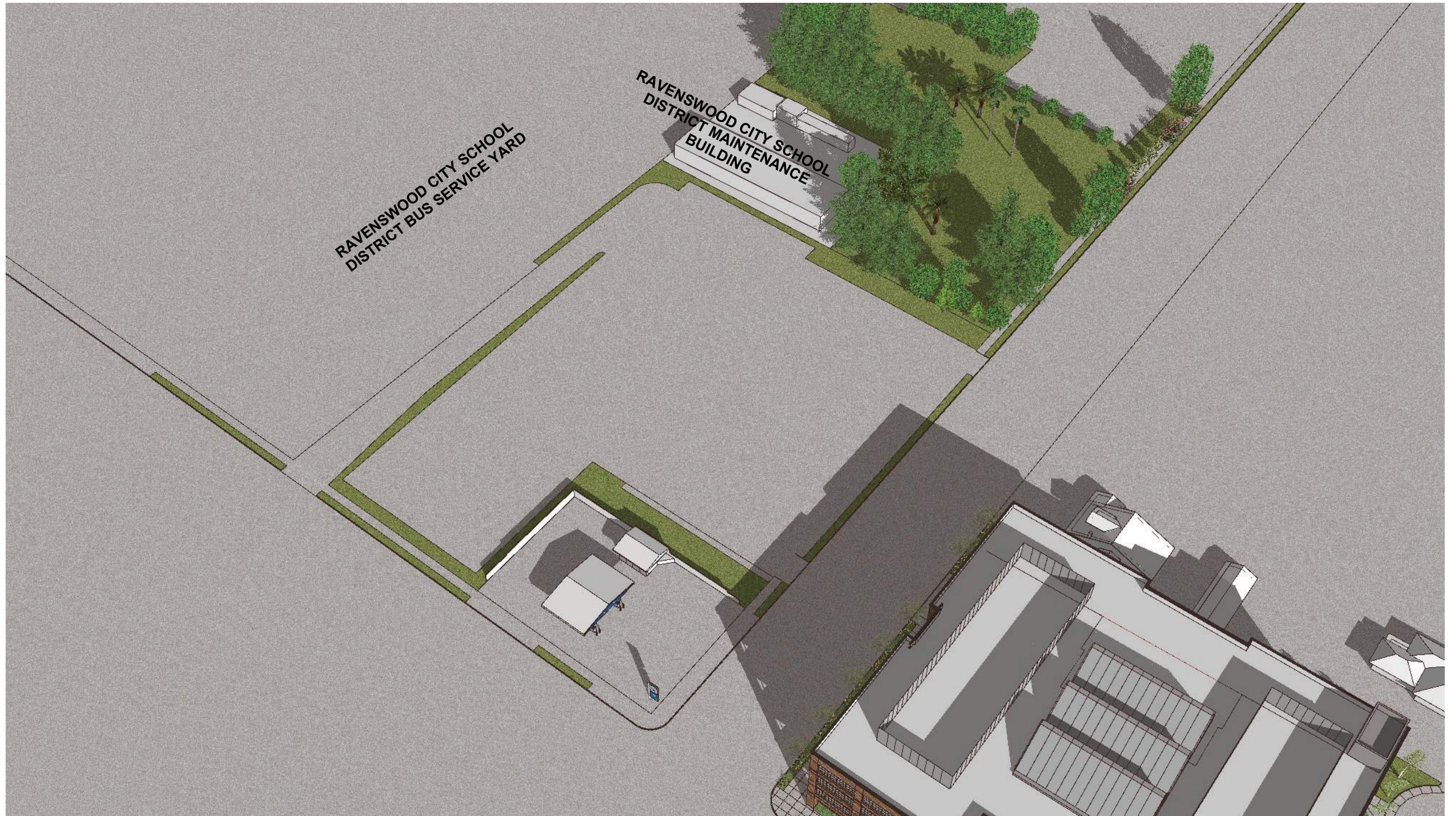
(per million)

Note that EMFAC2014 predicts DSL PM2.5 aggregate rates in 2018 that are 46% of EMFAC2011 for 2014. TOG gasoline rates are 56% of EMFAC2011 year 2014 rates. This is for light- and medium-duty vehicles traveling at 30 mph for Bay Area

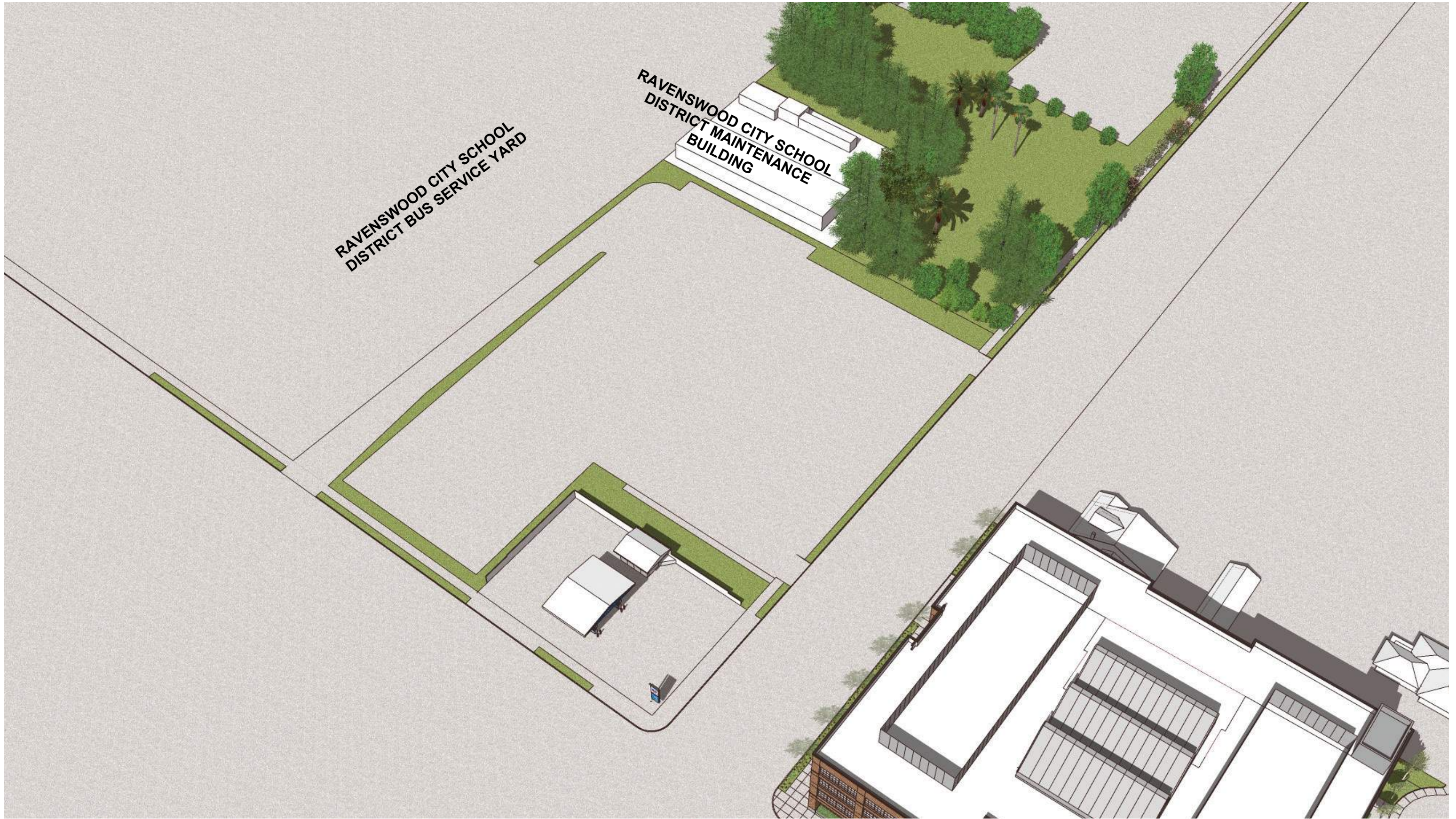
Notes and References:

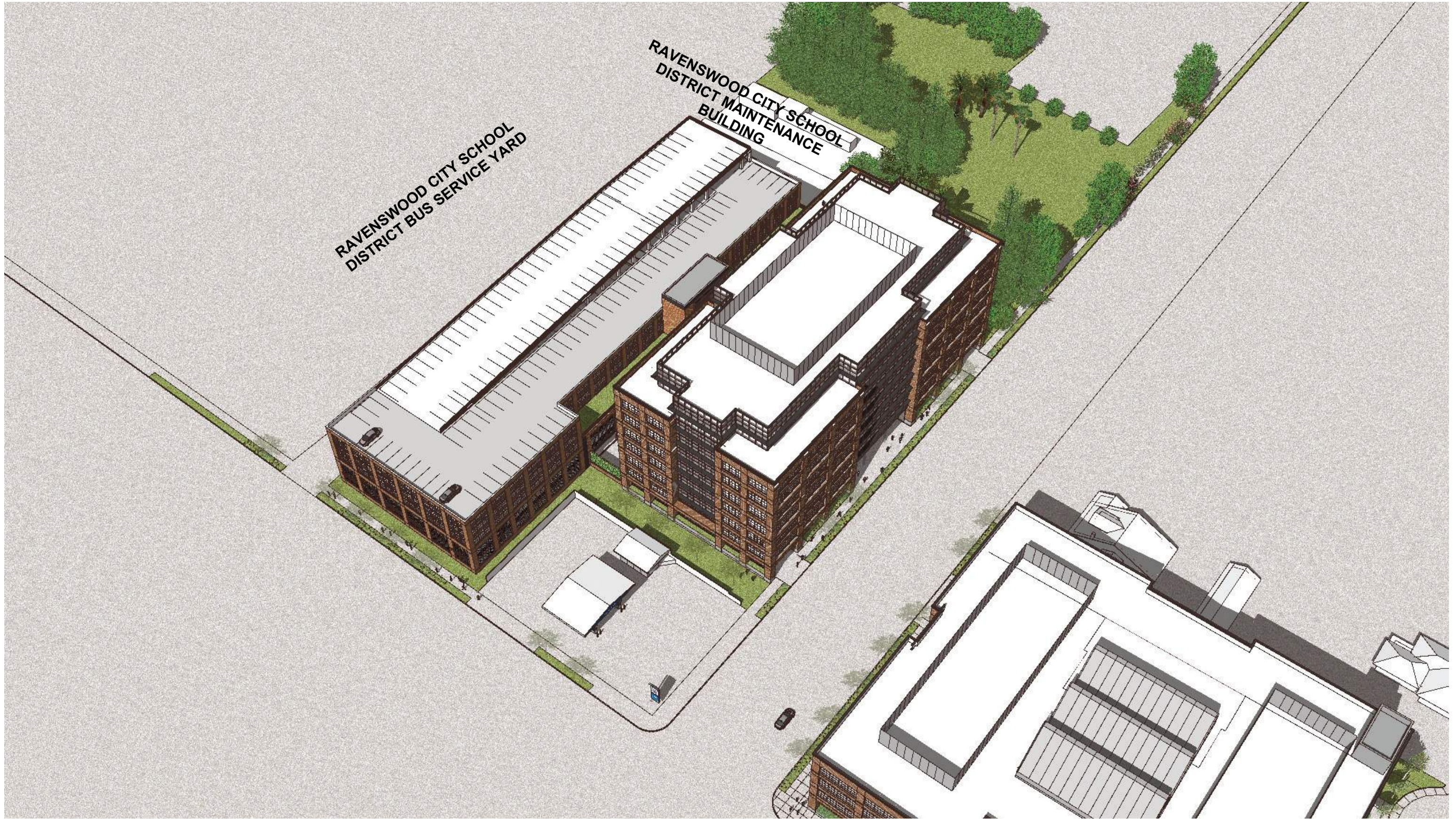
1. Emissions were developed using EMFAC2011 for fleet mix in 2014 assuming 10,000 AADT and includes impacts from diesel and gasoline vehicle exhaust, brake and tire wear, and resuspended dust.
2. Roadways were modeled using CALINE4 Cal3qhc air dispersion model assuming a source length of one kilometer. Meteorological data used to estimate the screening values are noted at the bottom of the "Results" box.
3. Cancer risks were estimated for 70 year lifetime exposure starting in 2014 that includes sensitivity values for early life exposures and OEHHA toxicity values adopted in 2013.

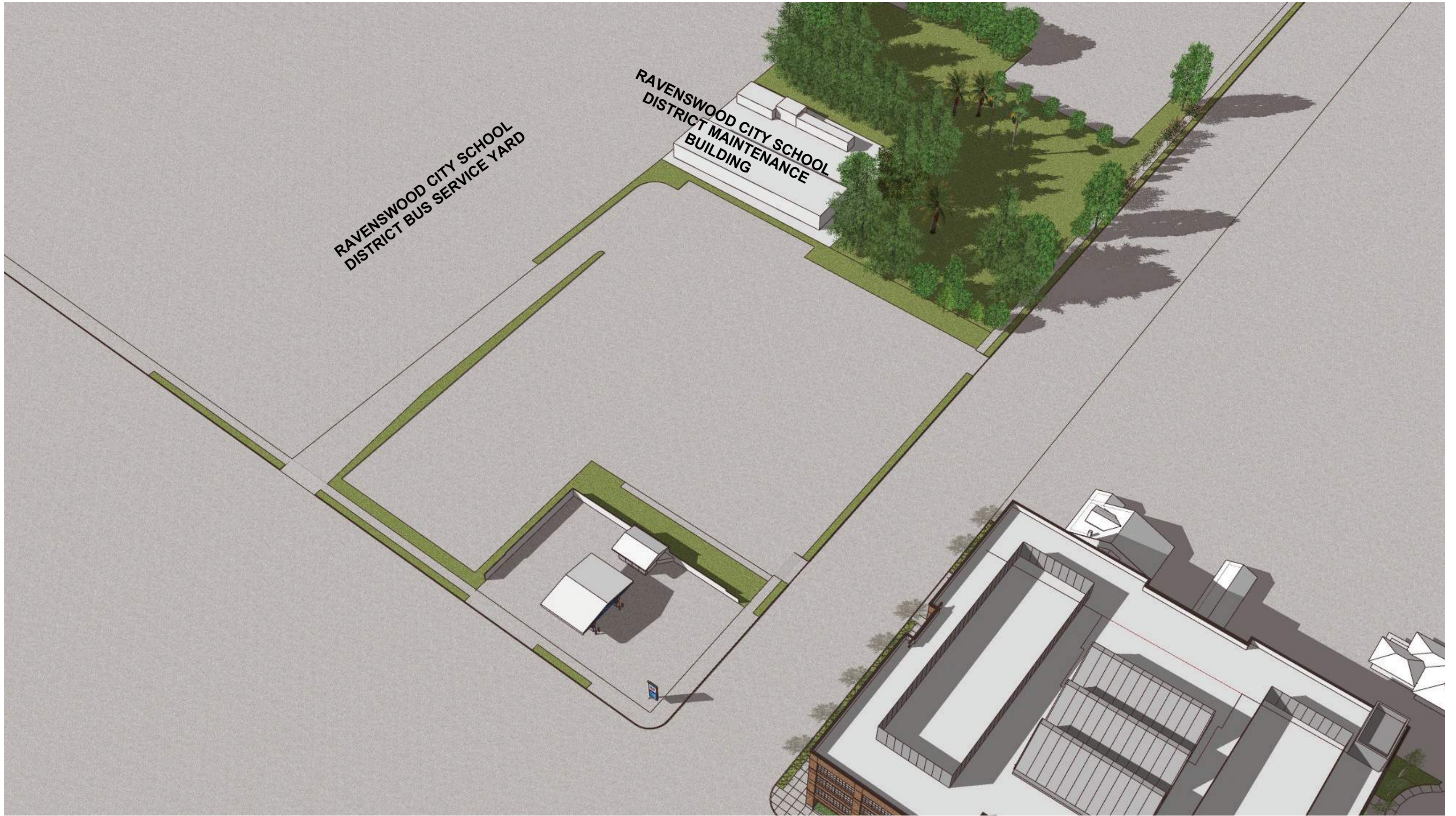
Appendix C: Shade Shadow Analysis











RAVENSWOOD CITY SCHOOL
DISTRICT BUS SERVICE YARD

RAVENSWOOD CITY SCHOOL
DISTRICT MAINTENANCE
BUILDING





