

EXECUTIVE SUMMARY

This Environmental Impact Report is an informational document prepared pursuant to the California Environmental Quality Act (CEQA), Public Resources Code (PRC) Section 21000 et seq., that is intended to disclose to the public and decision-makers the environmental consequences of the proposed Saratoga Retirement Community Campus Expansion (the Project), proposed by Ankrom Moisan Architects on behalf of the Saratoga Retirement Community/Pacific Retirement Services (the Project Applicant). This report is prepared for the Lead Agency under CEQA, the City of Saratoga (City).

This executive summary highlights the major areas of importance in the environmental analysis for the Project, as required by Title 14, California Code of Regulations (CCR), Section 15123 of the CEQA Guidelines (CEQA Guidelines). This executive summary includes (1) a summary description of the proposed Project, (2) a synopsis of environmental impacts and recommended mitigation measures (Table ES-1), a summary description of cumulative impacts (Table ES-1), (3) identification of the alternatives evaluated, and (4) a discussion of the areas of controversy associated with the Project.

SUMMARY OF THE PROPOSED PROJECT

Project Location and Setting

The Saratoga Retirement Community (SRC) campus is at 14500 Fruitvale Avenue, Saratoga, on three contiguous parcels totaling approximately 37 acres. The Assessor Parcel Numbers (APN) of the parcels are: 397-12-012, 397-12-019, and 397-40-006. The SRC campus is located within a predominantly residential neighborhood, approximately halfway between State Route (SR) 85 to the northeast and SR 9 to the southwest. The West Valley College Campus is located approximately a quarter of a mile to the north of the SRC campus.

The existing SRC campus is a private residential community for seniors, which is centered around the Saratoga Manor (the Manor Building), a Mission Revival-style building that was completed in 1912 by the Independent Order of Odd Fellows to care for older members of the order. The Manor Building, also known as the Odd Fellows Home, is listed on the City's Heritage Resources Inventory but has not been designated as a historic landmark by the City. The Manor Building is also eligible for listing in the California Register of Historical Resources (CRHR) and information relating to the Manor Building as a historical resource is provided in Section 3.5 of this Environmental Impact Report (EIR).

The facility currently has 249 residential units (143 independent living units and 106 assisted living units) and 94 skilled nursing beds. Independent living units are provided within the Manor building, two apartment buildings, and 20 villas/cottages. Assisted living units are provided within an assisted living building which contains 88 assisted living beds and 18 memory care beds. The 94 skilled nursing beds are located within the Health Center. A fitness center is also present at the site.

Project Description

The Project Applicant is seeking approval to construct three new residential buildings, a new meeting room addition to the existing Manor building, and an expansion to the existing fitness center. The proposed Project also includes a reduction in the number of existing memory care

and skilled nursing beds at the facility, to accommodate increased patient preference for private single-occupancy rooms rather than the current double occupancies. If approved, the proposed Project would result in a total of 298 residential units (195 independent living units and 103 assisted living units) and 52 skilled nursing beds at the facility.

Building A would be constructed within the existing garden/recreation area south of the Manor building and north of the Fitness Center. The proposed building would contain 22 independent living residential units on two floors (total area 35,898 square feet [SF]) with one level of below-grade parking (16,879 SF) containing 34 parking spaces. The height of Building A above average grade would be approximately 37 feet, and the total building footprint would be 17,949 SF.

Building B would be constructed within the parking lot north of the Manor building. The proposed building would contain 10 independent living units on two floors (total area 28,475 SF), with a partial level of at-grade parking and one level of below-grade parking. A total of 64 parking spaces (31,710 SF) would be provided. The height of the building above average grade would be approximately 27.5 feet, and the total building footprint would be 24,659 SF.

Building C would be constructed within the parking lot north of the assisted living building. The building would contain 20 independent living units on three floors (total area 41,715 SF), with a partial level of at-grade parking and one level of below-grade parking providing a total of 77 parking spaces (25,899 SF). The height of the building above average grade would be approximately 40.5 feet, and the total building footprint would be 18,509 SF.

The Meeting Room Addition would be attached to the west of side of the Manor building at its existing doorway. The main floor of the addition (4,792 SF) would contain a meeting room (3,259 SF) and associated storage and lobby areas, with one floor of at-grade parking (7,043 SF) below.

The Fitness Center Addition would be constructed west of the existing Fitness Center building, connecting to the southern side of the corridor between the fitness room and pool. This single-story building would be approximately 1,065 SF in area, and just over 16 feet in height above average grade.

A total of 52 new independent living residential units would be constructed as part of the proposed Project (22 in Building A, 10 in Building B, and 20 in Building C), bringing the total number of independent living units on the property to 149. There would be no change to the number of existing independent living units within the Manor building, two Apartment Buildings, and Cottages, and no change to the number of assisted living units within the assisted living building.

The number of memory care beds within the assisted living building would be reduced from 18 to 15 (i.e., a reduction of 3 memory care beds), and the number of skilled nursing beds within the Health Center would be reduced from 94 to 52 (i.e., a reduction of 42 skilled nursing beds). The number of memory care and skilled nursing beds is proposed to be reduced due to conversion of semi-private double-occupancy rooms to private single-occupancy rooms, each with their own fully-accessible bathroom.

Recreational facilities displaced by construction (i.e., the putting green and bocce ball court) would be relocated to the west of Building A. The proposed Project would also include a public trail connection along Odd Fellows Drive, connecting Fruitvale Avenue with the San Marcos Open Space, via Chester Avenue, Gypsy Hill Road, and Via De Marcos.

Project Objectives

The Project Applicant's objectives for the Project are to:

- 1) Continue to improve this long established and well respected Life Plan Community so that it responds to the changing Senior Housing market, and remains a viable campus for years to come. Continue to provide a campus where seniors can age in place, with independent living, assisted living, memory care, and Skilled Nursing.
- 2) Add a minimum of 52 new independent living senior housing units to provide the opportunity for more seniors, including many from the city of Saratoga, to enjoy independent living, with access to a high quality continuum of care.
- 3) Generate an additional income stream from the new independent living units, to help upgrade other parts of the campus including a major renovation of the Health Center. Always maintain a strong financial position to insure the future of the campus.
- 4) Provide upgrades to the existing Health Center, which would include converting existing semiprivate rooms to private rooms with private baths.
- 5) Preserve and maintain the existing the buildings on the campus, including the original Manor Building and the Health Center.
- 6) Provide a new and larger Meeting Room, that will seat all the apartment and cottage residents on the campus.
- 7) Expand Independent Dining to serve the additional residents that will join the campus and provide more dining choices for existing residents.
- 8) Provide an additional Fitness Building suitable for more fitness options like floor exercise, aerobics, yoga, tai chi, dance, and more.
- 9) Ensure that new buildings are designed to blend with the existing independent living buildings and Cottages, and also designed to respect and be sympathetic to the original Manor Building.
- 10) Augment the existing parking on the campus for the residents, staff, visitors, service providers, and vendors.
- 11) Maintain a high level of landscape design, amenities, and plant materials on the campus.

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-1 (at the end of this section) summarizes all of the impacts of the proposed Project, identifies the significance determination of each impact, and presents the full text of the recommended mitigation measures for each impact. A complete discussion of impacts and associated mitigation measures is presented in Section 3, "Environmental Setting and Impact Assessment," of this EIR.

SUMMARY OF PROJECT ALTERNATIVES

The alternatives discussion of this EIR was prepared in accordance with Section 15126(d) of the CEQA Guidelines and focuses on alternatives that are capable of eliminating or reducing significant adverse effects associated with the Project while feasibly attaining most of the basic

objectives. The following discussion summarizes the alternatives evaluated in this EIR. See Chapter 4, “Alternatives,” for additional detail.

- **No Project Alternative:** CEQA Guidelines Section 15126.6(e) requires that an EIR analyze a “No Project” alternative. The purpose of describing and analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project. The No Project Alternative reflects the conditions that would reasonably be expected to occur in the foreseeable future if the project were not approved (CEQA Guidelines Section 15126.6(e)). Under the No Project Alternative, the proposed campus expansion would not occur and no new facilities would be constructed.
- **Alternative 1 – Residents’ Alternative:** Alternative 1 was proposed by a group of existing SRC residents known as “Preserve SRC” as a potential alternative to the proposed Project that would provide the same number of new independent living units (52) on the campus whilst possibly avoiding or minimizing some of the key concerns that many of the existing SRC residents have about the proposed Project. Many public comments received during the EIR Scoping Period requested that a detailed analysis of the Residents’ Alternative be included in the EIR. Alternative 1 would involve construction of a new skilled nursing building within the same footprint as the Project’s proposed Building C, into which the existing Health Center residents and facilities would be relocated following its completion. The existing Health Center would then be demolished, and a new building (Building D, not part of the proposed Project) would be constructed in its place to house the 52 new independent living units and a meeting room facility. The Fitness Center Addition would be constructed under Alternative 1, exactly as proposed by the Project. Buildings A and B and the proposed Meeting Room adjacent to the Manor building would not be constructed under this alternative.
- **Alternative 2 – Reduced Development Alternative:** Alternative 2 would be identical to the proposed Project, except that Building B and the associated improvements to the north of the Manor Building would not be constructed. The existing circular driveway (Manor Circle) and associated landscaped area and parking spaces in front of the Manor building would remain unchanged, except at the very northeastern extent where Colfax Lane would be realigned to allow construction of Building C. All other components would be as described for the proposed Project, except that Building A and/or Building C would be internally reconfigured to allow for 10 additional independent living units to be incorporated so that the redevelopment under this alternative would have the same number of new independent living units (52 units) as the proposed Project. In addition, the underground parking garages of either Building A and/or Building C and/or the Meeting Room would be expanded and reconfigured to accommodate additional parking spaces so that the total number of parking spaces on site under this alternative would be the same as or similar to the proposed Project.
- **Alternative 3 – Applicant’s Alternative:** Alternative 3 was submitted by the Project Applicant as a potential alternative development plan for the campus that would provide the same number of new independent living units (52) on the campus as the proposed Project, without including Building B in front of the existing Manor Building and associated significant and unavoidable historic impacts. Alternative 3 would include the construction of Building A, Building C, the Meeting Room Addition, and Fitness Center Addition, exactly as proposed by the Project. In addition, the internal improvements to the existing Health Center units, Manor Building dining area, installation of a secondary emergency access point, removal of the small traffic circle at the entrance to Odd Fellows Drive, and the proposed public trail connection along Odd Fellows Drive, would also be the same as described for the proposed Project. Alternative 3 would not include construction of Building B in front of the Manor

Building. Instead, a new “Building D” would be constructed within the space currently occupied by the employee parking lot and northernmost duplex cottage (which would be demolished) on the southwest corner of Odd Fellows Drive and West Cottages Lane. Building D would be a 2-story building containing 10 independent living units on the upper floor, and 2 additional independent living units and 32 parking spaces on the lower floor. A new single cottage unit would be constructed further south along West Cottage Lane (opposite the Fitness Center Addition). Additional surface parking would be installed within the grassed area between Manor Circle and Odd Fellows Drive.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that, among the alternatives, an “environmentally superior” alternative be selected and that the reasons for such selection be disclosed. In general, the environmentally superior alternative is the alternative that would generate the fewest or least severe adverse impacts. Alternatives are discussed in Section 4 of this EIR.

The No Project Alternative is environmentally superior because it would have no environmental impacts and would avoid the proposed Project’s significant and unavoidable impacts on historical resources and construction noise. When the No Project Alternative is environmentally superior, CEQA requires that another alternative be identified [CEQA Guidelines Section 15126.6(e)(2)].

Alternative 2, the Reduced Development Alternative, would avoid the proposed Project’s significant and unavoidable impact to historical resources, but would require the same mitigation measures as the Project (MM-CUL-1a through MM-CUL-1c) in order to reduce the potential impacts to less than significant with mitigation (Impact CUL-1). Alternative 2 would reduce the intensity of several impacts compared to the proposed Project due to the smaller construction footprint, e.g., construction-related air emissions (Impact AIR-1), tree removal (Impact BIO-5), potential for encountering archaeological, tribal or paleontological resources (Impacts CUL-2, GEO-6, and TCR-1), greenhouse gas emissions (Impact GHG-1), construction noise (Impact NOI-1) and construction vibration (Impact NOI-2), even though the overall level of significance for these impacts would be the same. Unlike Alternative 1, Alternative 2 would not introduce any new or more significant impacts and would not require any additional mitigation measures. Alternative 3 would also avoid the proposed Project’s significant and unavoidable impact to historical resources; but would require an additional mitigation measure (MM-CUL-1d-ALT3) and would also have slightly increased intensity of some construction-related impacts due to the larger construction footprint.

For these reasons, the City has determined that the next environmentally superior alternative to the No Project Alternative would be Alternative 2, the Reduced Development Alternative.

NOTICE OF PREPARATION COMMENTS

Section 15213 of the CEQA Guidelines requires that the lead agency identify areas of controversy and issues to be resolved, including issues raised by other agencies and the public. The Notice of Preparation and written comments received in response to the Notice of Preparation are included in **Appendix A**.

Section 1.2.1, “Notice of Preparation and Scoping Meeting” of this EIR provides a summary of the issues raised during the scoping period and directs readers to where such issues are addressed within the analysis.

ISSUES TO BE RESOLVED

The State CEQA Guidelines require that an EIR present issues to be resolved by the lead agency. These issues include the choice among alternatives and whether or how potentially significant impacts can be mitigated. The major issues to be resolved by the City regarding the Project are:

- whether the recommended mitigation measures should be adopted or modified;
- whether there are any additional mitigation measures that should be applied to the proposed Project; and
- whether the proposed Project, a project alternative, or no project should be approved.

Table ES-1 Summary of Project Impacts and Mitigation Measures

Summary of Impacts and Mitigation	Level of Significance
<p>Impact AES-1: Scenic Vistas The Project would not have a substantial adverse effect on a scenic vista. Mitigation: none required</p>	<p>Before Mitigation: NI After Mitigation: N/A</p>
<p>Impact AES-2: Scenic Resources The Project would not substantially damage scenic resources. Mitigation: none required</p>	<p>Before Mitigation: NI After Mitigation: N/A</p>
<p>Impact AES-3: Scenic Quality The Project would not conflict with applicable zoning and other regulations governing scenic quality. Mitigation: none required</p>	<p>Before Mitigation: NI After Mitigation: N/A</p>
<p>Impact AES-4: Light and Glare The Project would not create a new source of substantial light or glare. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact AIR-1: Conflict with an Applicable Air Quality Plan The Project would not conflict with or obstruct implementation of applicable air quality plans. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact AIR-2: Net Increase in Criteria Pollutants The Project could result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. Mitigation <u>MM-AIR-2: Fugitive Dust Reduction Measures</u> A. The construction contractor shall comply with the following BAAQMD BMPs for reducing construction emissions of uncontrolled fugitive dust (PM10 and PM2.5):</p> <ol style="list-style-type: none"> i. All exposed surfaces (e.g., parking areas, staging areas, soil piles, stockpiles, graded areas, and unpaved access roads) shall be watered twice daily, or as often as needed, treated with non-toxic soil stabilizers, or covered to control dust emissions. Watering should be sufficient to prevent airborne dust from the leaving the site. ii. All haul trucks transporting soil, sand, or other loose material off site shall be covered. iii. All visible mud or dirt track-out onto adjacent public roads and paved access roads shall be removed using wet power (with reclaimed water, if possible) vacuum street sweepers at least once per day, or as often as needed. The use of dry power sweeping is prohibited. iv. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. v. 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. 	<p>Before Mitigation: PS After Mitigation: LTSM</p>

Summary of Impacts and Mitigation	Level of Significance
<ul style="list-style-type: none"> vi. Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by California airborne toxics control measure Title 13 CCR Section 2485). Clear signage shall be provided for construction workers at all access points. vii. 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. viii. A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD’s phone number also shall be visible to ensure compliance with applicable regulations. <p>B. The Project Applicant’s project manager or his/her designee shall verify compliance that these measures are included in the Project’s grading plan and have been implemented during normal construction site inspections.</p>	

Impact AIR-3: Exposure of Sensitive Receptors Before Mitigation: PS
 The Project could expose sensitive receptors to substantial pollutant concentrations.
 Mitigation MM-AIR-3: Require Clean Construction Equipment After Mitigation: LTSM

A. Construction contractors shall use equipment that meets the USEPA’s Tier 4 Final emissions standards for off-road diesel-powered construction equipment with engines rated 50 horsepower or greater for all construction activities, unless it can be demonstrated to the City of Saratoga Community Development Department on a case-by-case basis that such equipment is not available. Documentation shall consist of signed written statements from at least three construction equipment rental firms identifying that such equipment is not available. If the City of Saratoga Community Development Department grants the exception, the construction contractor must use the next-cleanest piece of available off-road equipment, according to the step-down alternative compliance table below. If seeking an exception, the construction contractor shall demonstrate to the City of Saratoga Community Development Department’s satisfaction that the resulting construction emissions would not exceed the health risk thresholds of significance for cancer risk and PM_{2.5} concentrations with respect to sensitive receptors, as identified within the EIR under Impact AIR-3.

Compliance Alternative	Engine Emissions Standard	Emissions Control
1	Tier 4 Interim	
2	Tier 3	CARB Level 3 VDECS

Notes:
 How to use the table: If the City of Saratoga Community Development Department determines that the equipment requirements cannot be met, then the construction contractor must attempt to meet Compliance Alternative 1. If the City of Saratoga Community Development Department determines that the contractor cannot supply off-road equipment that meets Compliance Alternative 1, then the contractor must meet Compliance Alternative 2.
 VDECS = Verified Diesel Emissions Control Strategies

B. Prior to construction, the project engineer shall ensure that all construction (e.g., demolition and grading) plans clearly show the requirement for USEPA Tier 4 Final emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the City of Saratoga. The construction equipment list shall state the makes, models, and numbers of construction equipment on site in addition to the engine tier rating and CARB engine identification number for each piece of construction equipment.

Summary of Impacts and Mitigation	Level of Significance
<p>Impact AIR-4: Other Emissions Including Those Leading to Odors The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact BIO-1: Impacts to Candidate, Sensitive, or Special Status Species The Project could result in a substantial adverse effect on candidate, sensitive, or special status species. Mitigation <u>MM-BIO-1: Nesting Bird Avoidance Measures</u> To the extent practicable, construction activities and any tree trimming/removal shall be performed from September 16 through February 15 to avoid the general nesting period for birds. If construction or tree trimming/removal cannot be performed during this period, nesting bird surveys and active nest buffers (as necessary) will be implemented as follows:</p> <ul style="list-style-type: none"> A. Nesting Bird Surveys: If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist will conduct two surveys for active nests of such birds within 14 days prior to the beginning of Project construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding the work area shall be determined by the qualified biologist, but should be at least: i) 50 feet for passerines; ii) 300 feet for raptors. Surveys should be conducted at the appropriate times of day and during appropriate nesting times, as determined by the qualified biologist. B. Active Nest Buffers: If the qualified biologist documents active nests within the survey area, an appropriate buffer between the nest and active construction should be established. The buffer should be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist should conduct baseline monitoring of the nest to characterize “normal” bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist should monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman should have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. Construction will only be allowed to impact a migratory bird or its nest, including its young, if a permit from U.S. Fish and Wildlife Service is obtained in accordance with the MTBA. 	<p>Before Mitigation: PS After Mitigation: LTSM</p>
<p>Impact BIO-2: Impacts to Riparian Habitat or Other Sensitive Natural Communities The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural communities. Mitigation: none required</p>	<p>Before Mitigation: NI After Mitigation: N/A</p>
<p>Impact BIO-3: Impacts to State or Federally Protected Wetlands The Project would not have a substantial adverse effect on state or federally protected wetlands. Mitigation: none required</p>	<p>Before Mitigation: NI After Mitigation: N/A</p>
<p>Impact BIO-4: Impacts to Fish or Wildlife Movement, Migration or Nursery Sites The Project could interfere substantially with the movement of any native resident or migratory fish or wildlife species.</p>	<p>Before Mitigation: PS</p>

Summary of Impacts and Mitigation	Level of Significance
<p><u>Mitigation MM-BIO-4: Roosting Bat Surveys and Avoidance</u></p> <p>The Project Applicant shall retain a qualified biologist to conduct a bat habitat assessment in all project areas that require tree removal. The qualified biologist will identify and document the location of potentially suitable bat roosting habitat prior to construction activities. If no suitable bat habitat is observed, the biologist shall inform the City Planning Department, the Project Applicant and its Construction Contractor, and no further considerations are required. If bat roosting habitat is observed, the location of such habitat areas shall be provided to the City Planning Department, the Project Applicant and its Construction Contractor, and the following requirements shall be implemented throughout the construction period:</p> <ol style="list-style-type: none"> A. Removal of trees that provide suitable bat roosting habitat shall be conducted outside of the bat maternity season (April 15 to August 31) and overwintering season (October 16 to January 15) to the extent feasible. B. Presence/absence surveys shall be conducted 2 to 3 days prior to removal of any trees in suitable bat habitat, at any time of year. If presence/absence surveys are negative, work may proceed with no restrictions. If presence/absence surveys detect bats within trees planned for removal, work should proceed in accordance with the following restrictions: <ol style="list-style-type: none"> i. If a maternity colony of bats is observed during maternity season (April 15 to August 31), tree removal shall not occur until August 31 or when maternity season has ended based on surveys conducted by a qualified biologist. ii. If bats are observed during overwintering season (October 16 to January 15), tree removal shall not occur until January 15 or until bats are no longer present based on surveys conducted by a qualified biologist. iii. If bats are present outside of maternity or overwintering seasons, construction shall follow a two-phase tree removal system conducted over 2 consecutive days. On the first day (in the afternoon), limbs and branches will be removed using chainsaws or other hand tools. Limbs with cavities, crevices, or deep bark fissures will be avoided, and only branches or limbs without those features will be removed. On the second day, the entire tree shall be removed. 	After Mitigation: LTSM
<p>Impact BIO-5: Conflict with Local Policies or Ordinances Protecting Biological Resources</p> <p>The Project would not conflict with any local policies or ordinances protecting biological resources.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: LTS</p> <p>After Mitigation: N/A</p>
<p>Impact BIO-6: Conflict with Habitat Conservation Plans or Natural Community Conservation Plans</p> <p>The Project would not conflict with the provisions of an approved local, regional, or state habitat conservation plan.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: NI</p> <p>After Mitigation: N/A</p>
<p>Impact CUL-1: Adverse Change to Historical Resources</p> <p>The Project would have a substantial adverse change in the significance of a historical resource.</p> <p><u>Mitigation MM-CUL-1a: Historical Resource Protection Plan</u></p> <p>Prior to construction, the Project proponent shall prepare a Historical Resource Protection Plan, under the oversight of an architectural historian and/or historian meeting the Secretary of the Interior’s Professional Qualification Standards (36 CFR Part 61). The Historical Resource Protection Plan shall be implemented throughout the duration of construction activities, and shall include, but not be limited to, the following measures:</p>	<p>Before Mitigation: S&U</p> <p>After Mitigation: S&U</p>

Summary of Impacts and Mitigation	Level of Significance
<p>A. A pre-construction survey on the Manor Building shall be conducted by an architectural historian who meets the Secretary of the Interior's Historic Preservation Professional Qualification Standards. The Pre-construction survey shall establish a baseline of existing conditions of exterior of the Manor Building with written descriptions, photographs, and sketches of all cracks, spalling, or similar damage.</p> <p>B. A vibration management and continuous monitoring plan shall be developed and adopted to protect the Manor Building against damage caused by vibration during project construction. The vibration management and monitoring plan related to the Manor Building shall be submitted to the Planning Division prior to issuance of any grading or building permits. The vibration management and monitoring plan shall be at the direction of the qualified structural engineer and shall constitute a blended approach, using both optical survey targets and crack monitors. Use of optical survey targets and crack monitors during construction shall measure whether construction vibration is approaching levels where damage to the historical resource may be possible. The vibration management and monitoring plan shall include site visits every six months by an architectural historian who meets the Secretary of the Interior's Historic Preservation Professional Qualification Standards, during the duration of construction to survey and record any changes to the exterior of the Manor Building. Construction methods shall be reevaluated if measurements and levels of vibration are found to exceed the levels established in the vibration management and monitoring plan and/or if damage to the historical resource may be possible.</p> <p>C. Pre-construction fencing shall be installed at construction zones around the perimeter of the Manor Building to prevent damage to the building from physical impact of construction equipment and/or vehicles. Such fencing shall be maintained throughout the duration of the construction periods for Building B and the Meeting Room, but shall allow for pedestrian access to and from the Manor Building by residents and others. If it is necessary to temporarily remove the fencing for logistical reasons, the physical and temporal extent of removal shall be minimized to the extent necessary for the task, and the unfenced area shall be monitored by a spotter until the fencing is replaced.</p> <p>D. A post-construction survey on the Manor Building shall be conducted by an architectural historian who meets the Secretary of the Interior's Historic Preservation Professional Qualification Standards. The post-construction survey shall report any changes that occurred to the exterior of the Manor Building during construction with written descriptions, photographs, and of all pre-construction survey areas that expanded during construction and/or any new cracks, spalling, or similar damage that occurred during construction. If the post-construction survey report documents any damage as a result of Project construction, the architectural historian shall make recommendations for the method of repair for such damage to pre-construction condition, in accordance with the Secretary of the Interior's Standards for Rehabilitation. The Project Applicant shall implement the recommended repairs under the oversight of the architectural historian at the Project Applicant's expense.</p>	
<p>Mitigation <u>MM-CUL-1b: Archival Documentation (HABS/HALS)</u></p>	
<p>A. The Manor Building and its associated character-defining features on the Project site shall be documented in accordance with the guidelines established for the Historic American Building Survey/Historic American Landscape Survey (HABS/HALS) program. At a minimum, archival documentation shall include:</p> <ul style="list-style-type: none">i. Large-format photographsii. Written narrative following HABS/HALS short format outlineiii. Sketch plan of the Manor Building site, including spatial relationship to Odd Fellows Drive	

Summary of Impacts and Mitigation	Level of Significance
<ul style="list-style-type: none"> B. An architectural historian and/or historian meeting the Secretary of the Interior’s Professional Qualification Standards (36 CFR Part 61) shall oversee the preparation of the archival documentation. The Level III HABS-equivalent documentation shall cover the Manor Building, along with associated features, spaces, and landscaping. C. Archival-quality prints of the documentation shall be submitted to the City of Saratoga for archival and educational purposes. Additional print copies shall be made available to other local research institutions including the Saratoga Public Library. 	
Mitigation <u>MM-CUL-1c: Interpretive Program</u>	
<ul style="list-style-type: none"> A. The Manor Building and its associated features on the Project site shall be commemorated in an interpretive program, the details of which shall be determined in consultation with the City of Saratoga. The interpretive program may include, but shall not be limited to: <ul style="list-style-type: none"> i. Exhibit, website, pamphlet or similar ii. Historical displays 	
Impact CUL-2: Adverse Change to Archaeological Resources	
The Project could cause a substantial adverse change in the significance of an archaeological resource.	Before Mitigation: PS
Mitigation: <u>MM-CUL-2: Inadvertent Discovery Plan</u>	
<ul style="list-style-type: none"> A. Prior to the start of earthmoving activities, the Project Applicant shall retain a qualified archaeologist and a representative from Tamien Nation to develop and implement Archaeological Awareness and Tribal Cultural Resources Sensitivity Training and to develop a Monitoring and Treatment Plan in coordination with the City. <ul style="list-style-type: none"> i. The training shall include information regarding the possibility of encountering buried cultural resources (including tribal cultural resources), the appearance and types of resources likely to be seen during construction, notification procedures, and proper protocols to be followed should suspected or confirmed resources be encountered. This training shall be provided to all workers prior to their involvement in ground-disturbing activities throughout the duration of construction and shall be documented in training records. ii. The Monitoring and Treatment Plan shall include a project description, background information and context, definitions of monitoring roles and requirements for the project, protocols for discoveries during project work, a list of research questions, and specifications for treatment of finds, including scope of analysis, appropriate analytical techniques, and directions for curation and/or repatriation. This document also describes necessary documentation during project work (e.g., monitoring logs), and defines reporting requirements for results. B. The Project Applicant shall retain a Tamien Nation tribal cultural resources monitor to undertake construction monitoring during initial ground disturbing activities within native soils. Monitoring is not required for redisturbance of soils that have already been monitored. The Project Applicant shall also retain a qualified archaeologist to be on-call during construction and/or to be present for monitoring of initial ground disturbing activities. C. In the event that prehistoric or historic resources (or suspected resources) are encountered during project construction, all activity within a 50-foot radius of the find shall be stopped, the Project Applicant’s Project Manager or designee and the City Planning Department shall be notified, and the Tamien Nation tribal monitor and the on-call archaeologist shall examine the find. Project personnel shall not collect or move any cultural material. The archaeologist, in collaboration with the Tamien Nation tribal representative, shall evaluate the find(s) to determine if it meets the definition of a historical, unique archaeological, and/or tribal cultural resource, and follow the further procedures outlined below: 	After Mitigation: LTSM

Summary of Impacts and Mitigation	Level of Significance
<p>i. If the find(s) does not meet the definition of a historical resource or unique archaeological resource, no further study or protection is necessary prior to resuming Project implementation.</p> <p>ii. If the find(s) does meet the definition of a historical resource or unique archaeological resource, then it shall be avoided by Project activities. If avoidance is not feasible, as determined by the City, the qualified archaeologist, in collaboration with the Tamien Nation tribal representative, shall make appropriate recommendations regarding the treatment and disposition of such finds, and significant impacts to such resources shall be mitigated in accordance with the recommendations of the archaeologist, in collaboration with the Tamien Nation tribal representative, prior to resuming construction activities within the 50-foot radius.</p> <p>iii. If the find(s) is potentially a tribal cultural resource, then the Tamien Nation tribal representative shall be consulted. If, after consultation with the Tamien Nation, it is determined that the find(s) is a tribal cultural resource, then the find(s) shall be avoided by Project activities. If avoidance is not feasible, as determined by the City, the qualified archaeologist, in consultation with tribal representatives and the City, shall make appropriate recommendations regarding the treatment and disposition of such finds and significant impacts to such resources shall be mitigated in accordance with the recommendations of the archaeologist, and reasonably agreed upon by the Tamien Nation, prior to resuming construction activities within the 50-foot radius.</p> <p>iv. If the find(s) are human remains or grave goods, the requirements of PRC Section 5097.98, California Health and Safety Code Sections 7050.5, 7051, and 7054, and CEQA Guidelines Section 15064.5(e), shall be followed.</p> <p>v. Recommendations for treatment and disposition of finds could include, but are not limited to, the collection, recordation, and analysis of any significant cultural materials, or the turning over of tribal cultural resources to tribal representatives for appropriate treatment. A report of findings documenting any data recovery shall be submitted to the Northwest Information Center (NWIC). A redacted report of findings shall be submitted to the City's Planning Department.</p> <p>D. Reasonable efforts should be made to ensure that fill soils used for this Project do not contain archaeological materials. If it is found that fill soils used for construction purposes do contain archaeological materials, a different source of fill materials must be retained immediately.</p> <p>E. The Project Applicant shall fabricate and install an interpretive panel or plaque as part of the public trail connection along Odd Fellows Drive, acknowledging the tribal history and indigenous peoples of the area. The content of the panel shall be developed in consultation with the City and Tamien Nation tribal representatives.</p>	
Impact CUL-3: Disturbance of Human Remains	Before Mitigation: LTS
The Project would not disturb any human remains.	After Mitigation: N/A
Mitigation: none required	
Impact ENE-1: Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources	Before Mitigation: LTS
The Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources.	After Mitigation: N/A
Mitigation: none required	
Impact ENE-2: Conflict with or Obstruct a Renewable Energy or Energy Efficiency Plan	Before Mitigation: LTS
The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	After Mitigation: N/A
Mitigation: none required	

Summary of Impacts and Mitigation	Level of Significance
<p>Impact GEO-1: Substantial Adverse Effects from Seismic Hazards</p> <p>The Project would not cause potential substantial adverse effects involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, or landslides.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: LTS</p> <p>After Mitigation: N/A</p>
<p>Impact GEO-2: Substantial Soil Erosion or Loss of Topsoil</p> <p>The Project would not result in substantial soil erosion or loss of topsoil.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: LTS</p> <p>After Mitigation: N/A</p>
<p>Impact GEO-3: Unstable or Expansive Soils</p> <p>The Project would not be located on unstable soils.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: LTS</p> <p>After Mitigation: N/A</p>
<p>Impact GEO-4: Expansive Soils</p> <p>The Project would not be located on expansive soils.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: LTS</p> <p>After Mitigation: N/A</p>
<p>Impact GEO-5: Soil Suitability for Septic Systems</p> <p>The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.</p> <p>Mitigation: none required</p>	<p>Before Mitigation: NI</p> <p>After Mitigation: N/A</p>
<p>Impact GEO-6: Damage or Destruction of Unique Paleontological Resources</p> <p>The Project could destroy a unique paleontological resource or site or unique geological feature.</p> <p>Mitigation <u>MM-GEO-6: Paleontological Resource Avoidance Measures</u></p> <p>A. Before the start of earthmoving activities associated with Project construction, the Project Applicant shall require that all construction personnel involved with earthmoving activities be informed regarding the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and proper notification procedures if such fossils are encountered. This worker training may be prepared and presented by an experienced field archaeologist at the same time as construction worker education on cultural resources, or prepared and presented separately by a qualified paleontologist.</p> <p>B. If paleontological resources are discovered during earthmoving activities, all work within 50 feet of the find shall cease immediately, and the construction contractor shall notify the City of Saratoga Planning Division. The Project Applicant shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan, based on SVP guidelines (SVP 2010). The recovery plan may include a field survey, construction monitoring, sampling and data recovery procedures, museum curation for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the City (as the CEQA lead agency) to be necessary and feasible shall be implemented before construction activities resume at the site where the paleontological resources were discovered.</p>	<p>Before Mitigation: PS</p> <p>After Mitigation: LTSM</p>
<p>Impact GHG-1: GHG Emissions</p> <p>The Project could generate GHG emissions that may have a significant impact on the environment.</p>	<p>Before Mitigation: PCC</p>

Summary of Impacts and Mitigation	Level of Significance
<p>Mitigation <u>MM-GHG-1a: Require Compliance with Electric Vehicle Requirements in CALGreen Tier 2</u></p> <p>Prior to issuance of building permits, Project Building Plans shall demonstrate compliance with the following applicable measure included in the BAAQMD Thresholds for Climate Impacts, to the satisfaction of the City of Saratoga Community Development Department, that the Project achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.</p>	After Mitigation: LTSM
<p>Mitigation <u>MM-GHG-1b: Participation in Silicon Valley Clean Energy Program or On-Site Renewable Energy</u></p> <p>The Project shall enroll in the Silicon Valley Clean Energy “GreenStart” or “GreenPrime” program, which provide 100 percent GHG emissions free electricity to participating customers or meet 100 percent of their electricity demand through on-site renewable energy, such as solar panels.</p>	
<p>Impact GHG-2: GHG Plan, Policy, or Regulation Conflicts</p> <p>The Project could conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions.</p>	Before Mitigation: PS
<p>Mitigation: MM-GHG-1a and MM-GHG-1b (detailed for Impact GHG-1)</p>	After Mitigation: LTSM
<p>Impact HAZ-1: Hazards from Routine Use, Transport, Disposal, or Accidental Release of Hazardous Materials</p> <p>The Project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials or reasonably foreseeable upset and accident conditions involving the release of hazardous materials.</p>	Before Mitigation: LTS
<p>Mitigation: none required</p>	After Mitigation: N/A
<p>Impact HAZ-2: Result in Hazardous Emissions within One-Quarter Mile of a School</p> <p>The Project would not emit hazardous emissions or handle hazardous emissions within a quarter mile of a school.</p>	Before Mitigation: NI
<p>Mitigation: none required</p>	After Mitigation: N/A
<p>Impact HAZ-3: Result in Hazards from a Cortese-Listed Site</p> <p>The Project would not create a significant hazard to the public or the environment due to the site being a known hazardous materials site.</p>	Before Mitigation: NI
<p>Mitigation: none required</p>	After Mitigation: LTS
<p>Impact HAZ-4: Airport-related Safety or Noise Hazards</p> <p>The Project would not result in airport-related safety or noise hazards.</p>	Before Mitigation: NI
<p>Mitigation: none required</p>	After Mitigation: N/A
<p>Impact HAZ-5: Interfere with an Emergency Response or Evacuation Plan</p> <p>The Project could impair implementation of an emergency response plan or emergency evacuation plan.</p>	Before Mitigation: PS
<p>Mitigation: MM-TRA-3a and MM-TRA-4 (detailed in Impact TRA-3 and Impact TRA-4, respectively)</p>	After Mitigation: LTSM
<p>Impact HYD-1: Violate Water Quality Standard</p> <p>The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.</p>	Before Mitigation: LTS
<p>Mitigation: none required</p>	After Mitigation: N/A

Summary of Impacts and Mitigation	Level of Significance
<p>Impact HYD-2: Substantially Decrease Groundwater Supplies or Interfere with Groundwater Recharge The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact HYD-3: Substantially Alter Drainage Patterns Resulting in Erosion and Sedimentation, Flooding, Pollution, or Impedance of Flood Flows The Project would not substantially alter drainage patterns resulting in erosion or siltation, flooding, pollution, or redirection of flood flows. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact HYD-4: Release of Pollutants in Flood, Tsunami, or Seiche Hazard Zones The Project would not risk release of pollutants in flood, tsunami, or seiche hazard zones. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact HYD-5: Obstruct Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan The Project would not conflict with a water quality control plan or sustainable groundwater management plan. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact LUP-1: Physically Divide a Community The Project would not physically divide an established community. Mitigation: none required</p>	<p>Before Mitigation: NI After Mitigation: N/A</p>
<p>Impact LUP-2: Land Use Plan, Policy, or Regulation Conflicts The Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact NOI-1: Increase in Ambient Noise Levels The Project could result in generation of a substantial temporary increase in ambient noise levels in excess of applicable standards. Mitigation <u>MM-NOI-1a: Update and Implement Construction Noise Mitigation Plan</u> The Project Applicant and its construction contractor(s) shall update the preliminary Construction Noise Management Plan to include the following actions, and shall implement the updated plan throughout the duration of construction activities at the project site:</p> <ol style="list-style-type: none"> A. Provide ongoing coordination and training to all subcontractors on “Noise Awareness Training”. Training will help ensure the Construction Noise Mitigation Plan is implemented effectively. B. Engage the public and residents for active feedback: <ol style="list-style-type: none"> i. Provide sufficient notice (no fewer than 14 days prior to onset of any noise-intensive construction activity) to the facility, its residents, and neighboring properties within 200 feet of any construction area, including the anticipated schedule of planned work (if needed) on future construction activities. 	<p>Before Mitigation: PS After Mitigation: S&U</p>

Summary of Impacts and Mitigation	Level of Significance
ii. Such notices shall include contact information for a point of contact to address questions or noise concerns. iii. Conduct weekly status meeting with the Facilities team outlining upcoming activities, which shall be verifiably relayed to the residents.	
C. Identify noise abatement opportunities below, wherever practicable:	
i. Locate haul routes away from active noise-sensitive buildings ii. Locate storage and construction staff parking areas off site. iii. Design foundation systems that eliminate noise-intensive creating work, (e.g., pile driving). iv. Design shoring systems that prevent unnecessary noise or vibration.	
D. Mitigation at noise source:.	
i. Specify the use of quieter equipment/procedure alternatives, where practicable, in the contract documents. ii. Require equipment used onsite to produce sound levels below the City of Saratoga 100 dBA limit at 25 feet. iii. Schedule construction activities that generate higher noise levels at optimal times of the day. iv. Ensure all construction activities occur within the working hours prescribed by the City of Saratoga.	
E. Path mitigation by providing sound barriers.	
i. Provide temporary sound barriers along heavy traffic paths and portions of the site haul route as needed. ii. Provide temporary sound barriers that would obstruct the line-of-sight from receptors to key construction zone areas for all receptors predicted to experience construction noise levels greater than the FTA criterion of 80 dBA ($L_{eq(8-hour)}$). Such barriers shall be of sufficient mass and dimension to reduce predicted construction noise levels to the FTA criterion or lower wherever practicable. Should barrier implementation be infeasible, or if monitoring shows that noise levels at receptors still exceed the FTA criterion, residence windows shall be acoustically upgraded with sufficient window inserts or affected residents shall be temporarily relocated.	
F. Construction Noise Monitoring	
i. Noise measurements shall be conducted on a weekly basis to verify that noise barriers are performing as intended and construction noise levels remain at or below the FTA criterion at receptors. Measurements shall be conducted for a period considered representative of noise levels for the given day/week. Noise measurements shall also be conducted at the onset of new construction phases (considering phase changes in nearby work areas as well) and if ongoing construction activities shift drastically toward a receptor. ii. Measurements shall be conducted using a sound level meter rated by the American National Standards Institute as Class 1 or Class 2 per American National Standards Institute S1.4-2014. iii. Should monitored noise levels exceed the FTA criterion, construction activities generating the exceedance shall be stopped until either construction noise levels can be reduced to within limits or residents are relocated.	
G. Noise Receptor Mitigation	
i. The contractor shall coordinate with the facility to move residents temporarily if needed during construction activities that are disruptive.	

Summary of Impacts and Mitigation	Level of Significance
<p>ii. Facility management shall ensure that building heating, ventilation, and air conditioning systems are operating at full capacity/function throughout the construction period, to allow residents to maintain closed windows throughout the construction period.</p>	
<p>Mitigation <u>MM-NOI-1b: Limit Sound Power Level of Mechanical Equipment or Implement Additional Noise-Reduction Measures</u> Where possible, the Project Applicant shall install rooftop mechanical (HVAC) equipment with a sound power rating of 91 dBA or less on all proposed buildings. If mechanical equipment with a Sound Power Level rating of more than 91 dBA is to be installed, then prior to building permit issuance, the Project Applicant shall retain a qualified acoustic consultant to model the predicted noise levels on adjacent properties, based on the actual Sound Power Level rating of the units proposed for installation. The qualified acoustic consultant shall submit a report to the City Planning Department showing the predicted noise levels, and recommending additional measures (e.g., additional acoustic screening) to reduce the predicted noise levels at all adjacent properties to below the 40 dBA Leq threshold. The report shall also demonstrate that the recommended additional measures adequately reduce the predicted noise levels to below the 40 dBA Leq threshold.</p>	
<p>Impact NOI-2: Exposure of People to Groundborne Noise and Vibration Levels</p>	
<p>The Project could result in generation of a substantial temporary or permanent increase in ambient noise levels in excess of applicable standards.</p>	<p>Before Mitigation: PS</p>
<p>Mitigation <u>MM-NOI-2: Construction Vibration Minimization Measures</u></p>	
<p>The Project Applicant shall include the following measures in its contractor specifications, and such measures shall be implemented by the Contractor(s) during construction:</p>	<p>After Mitigation: LTSM</p>
<ul style="list-style-type: none"> A. The use of vibratory rollers within a 25-foot buffer zone around the Manor Building, and the use of drill rigs, large bulldozers, or dump trucks within a 15-foot buffer of the Manor Building shall be avoided to the maximum extent practicable. B. Where practicable, smaller equipment which generates lower levels of vibration shall be used within the specified buffer zones. C. Advance notice (at least 14 days) shall be provided to SRC residents, neighboring property owners and the City for construction activities requiring use of vibratory rollers within 75 feet of residential units, or the use of drill rigs, large bulldozers, or dump trucks within 45 feet of residential units. 	
<p>Mitigation <u>MM-CUL-1a: Historical Resource Protection Plan</u> (Detailed above under Impact CUL-1)</p>	
<p>Impact NOI-3: Excessive Airport Noise</p>	
<p>The Project would not expose people to excessive noise levels from nearby airports.</p>	<p>Before Mitigation: NI</p>
<p>Mitigation: none required</p>	<p>After Mitigation: N/A</p>
<p>Impact POP-1: Inducement of Unplanned Population Growth</p>	
<p>The Project would not directly or indirectly induce substantial unplanned population growth in an area.</p>	<p>Before Mitigation: NI</p>
<p>Mitigation: none required</p>	<p>After Mitigation: N/A</p>
<p>Impact POP-2: Displacement of People or Housing</p>	
<p>The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.</p>	<p>Before Mitigation: NI</p>

Summary of Impacts and Mitigation	Level of Significance
Mitigation: none required	After Mitigation: N/A
Impact PS-1: Impacts Associated with Provision of or Need for New or Altered Government Facilities	
The Project would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities.	Before Mitigation: LTS
Mitigation: none required	After Mitigation: N/A
Impact REC-1: Construction or Expansion of New Recreational Facilities	
The Project would not increase the use of existing recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Before Mitigation: LTS
Mitigation: none required	After Mitigation: N/A
Impact REC-2: Construction or Expansion of New Recreational Facilities	
The Project would not include or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	Before Mitigation: LTS
Mitigation: none required	After Mitigation: N/A
Impact TRA-1: Conflict with Transportation Plan, Program, Ordinance or Policy	
The Project would not conflict with a program plan, ordinance or policy addressing the circulation system.	Before Mitigation: LTS
Mitigation: none required	After Mitigation: N/A
Impact TRA-2: Consistency with CEQA Guidelines relating to Vehicle Miles Traveled	
The Project would not conflict with CEQA Guidelines related to vehicle miles traveled.	Before Mitigation: LTS
Mitigation: none required	After Mitigation: N/A
Impact TRA-3: Potential for Creation of Substantial Traffic-Related Hazards	
The Project could substantially increase traffic-related hazards.	Before Mitigation: PS
Mitigation: <u>MM-TRA-3a: Construction Traffic Control Plan.</u>	After Mitigation: LTSM
Prior to issuance of demolition or grading permits, the Project Applicant and/or its construction contractor shall develop a traffic control plan in accordance with the City's Standard Details and Specifications for Construction and Temporary Traffic Control Plan Requirements and shall submit the plan to the City for review and approval. The Traffic Control Plan shall be implemented throughout the duration of construction and shall include, but not be limited to, the following:	
<ul style="list-style-type: none"> A. Schedule of construction showing each phase of the project, construction hours, and anticipated method of handling traffic for each phase, including drawings identifying lane configurations, haul routes, road and lane closures, detour routes for vehicular and pedestrian traffic, work areas, staging areas, and worker parking areas. The location of signs, barricades, codes, etc., to warn, direct, and guide traffic shall be shown on the plan, as well as any supplementary traffic control devices that might be required. B. Development and implementation of a process for communicating with owners/occupants of properties accessed via Odd Fellows Drive and/or San Marcos Road about Project construction, with at least 72 hours advance notice prior to commencing work on the Project 	

Summary of Impacts and Mitigation	Level of Significance
<p>and of any temporary lane or road closures (including private roadways within the SRC campus). Notification shall include the construction schedule, the exact location and duration of activities on each roadway, detours and alternative routes that may be available to avoid delays, and contact information for questions and complaints. The City shall be included in any notifications.</p> <p>C. Notification of administrators of any affected police and fire stations, and ambulance service providers regarding the timing, location, and duration of construction activities and the locations of detours and road or lane closures. Access for emergency vehicles on and/or adjacent to roadways affected by construction activities shall be maintained at all times.</p> <p>D. Scheduling equipment/deliveries during off-peak vehicular commuter hours and use of flaggers if oversized loads are required.</p>	
Mitigation MM-TRA-3b: Implement Recommendations of Traffic Study	
<p>A. The Project Applicant shall implement all recommendations of the Traffic Study prepared for the Project by Hexagon Transportation Consultants Inc., dated January 22, 2021, which include:</p> <ul style="list-style-type: none"> i. that the Project Applicant ensure that there is no tall vegetation near the driveways that would block a driver's sight distance for 150 feet; ii. that stop signs should be installed for exiting vehicles at all new intersections, and a drop-off area be maintained in front of the Manor Building; iii. that a sign indicating one-way travel be installed at the exit from Pavilion Circle onto West Cottages Lane; and iv. that the Project Applicant clearly communicate with the delivery vehicles that they need to park in designated areas on site. <p>B. In addition, the Project Applicant shall develop and implement a delivery schedule for vendors so that the number of simultaneous deliveries to campus does not exceed the available designated loading space.</p>	
Impact TRA-4: Project-Related Interference with Emergency Access	
The Project could result in inadequate emergency access.	Before Mitigation: PS
Mitigation: <u>MM-TRA-3a: Construction Traffic Control Plan</u> (Detailed above under Impact TRA-3)	After Mitigation: LTSM
Impact TCR-1: Tribal Cultural Resources	
The Project could cause a substantial adverse change in the significance of an as-yet unidentified tribal cultural resource.	Before Mitigation: PS
Mitigation: <u>MM-CUL-2: Inadvertent Discovery Plan</u> (Detailed above under Impact CUL-2)	After Mitigation: LTSM
Impact UTI-1: New or Expanded Utility Services	
The Project would not require new or expanded utility services that could cause significant environmental effects.	Before Mitigation: LTS
Mitigation: none required	After Mitigation: N/A
Impact UTI-2: Sufficient Water Supplies	
The Project would have sufficient water supplies available.	Before Mitigation: LTS
Mitigation: none required	After Mitigation: N/A

Summary of Impacts and Mitigation	Level of Significance
<p>Impact UTI-3: Wastewater Treatment Capacity The Project would not result in determination of inadequate wastewater treatment capacity. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact UTI-4: Solid Waste Capacity & Solid Waste Statutes and Regulations The Project would not generate solid waste in excess of local standards or capacity of local infrastructure. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact UTI-5: Solid Waste Statutes and Regulations The Project would comply with solid waste management and reduction statutes and regulations. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact WF-1: Impairment of Emergency Response Plans or Emergency Evacuation Plans The Project could impair an emergency response plan or emergency evacuation plan. Mitigation MM-TRA-3a: <u>Construction Traffic Control Plan</u> (Detailed above under Impact TRA-3)</p>	<p>Before Mitigation: PS After Mitigation: LTSM</p>
<p>Impact WF-2: Exposure of Project occupants to pollutant concentrations from wildfire or uncontrolled spread of wildfire. This project would not expose Project occupants to pollutant concentrations from wildfire or uncontrolled spread of wildfire. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact WF-3: Installation or maintenance of infrastructure that may exacerbate fire risk The installation or maintenance of infrastructure associated with the Project would not exacerbate fire risk. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact WF-4: Exposure to significant risks as a result of runoff, post-fire slope instability or drainage changes The Project would not result in significant risks related to downslope or downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. Mitigation: none required</p>	<p>Before Mitigation: LTS After Mitigation: N/A</p>
<p>Impact MFS-1: Effects to Wildlife or Plant Species or Important Examples of California History or Prehistory The impact of the Project would be potentially significant. Implementation of MM-BIO-1 and MM-BIO-4 would reduce potential impacts on wildlife and plants to less than significant with mitigation; and MM-CUL-2 would reduce impacts on examples of California prehistory to less than significant with mitigation; but even with implementation of MM-CUL-1a through 1c the impact to important examples of California history would remain significant and unavoidable. Mitigation: <u>MM-BIO-1, MM-BIO-4, MM-CUL-1a through MM-CUL-1c, MM-CUL-2</u> (detailed above)</p>	<p>Before Mitigation: PS After Mitigation: LTSM or S&U</p>

Summary of Impacts and Mitigation	Level of Significance
<p>Impact MFS-2: Individually Limited but Cumulatively Considerable Impacts</p>	
<p>The cumulative impact would be no impact or less than significant for most resource topics. The overall cumulative impact would be potentially significant for some topics, but the Project's contribution would either be less than cumulatively considerable or could be reduced to less than cumulatively considerable with implementation of project-level or cumulative level mitigation.</p>	Before Mitigation: PS
<p>Mitigation: <u>MM-AIR-2, MM-CUL-2, MM-GEO-6, MM-GHG-1a, and MM-GHG-1b</u> (detailed above)</p>	After Mitigation: LTSM
<p>Mitigation <u>C-MM-TRA-1: Cumulative Construction Traffic Noise Reduction Plan</u></p>	
<p>In the unlikely event that the construction period for the Project overlaps with the construction period for future development on the adjacent Fellowship Plaza property, the Project Applicant and its construction contractor, in conjunction with the developer and contractor for the Fellowship Plaza project, shall develop a combined construction traffic noise reduction plan. The plan shall be submitted to the City for review and approval and shall be implemented by the Project Applicant and its contractors throughout the duration of overlapping construction. The combined plan shall contain, but not be limited to, the following:</p>	
<ul style="list-style-type: none"> A. Identification of anticipated periods when construction of the two projects would overlap, and the estimated level of construction traffic that would utilize Odd Fellows Drive and San Marcos Road from each project during those periods. B. Analysis from a qualified acoustic consultant determining the estimated cumulative increase in traffic noise along Odd Fellows Drive and San Marcos Road during those periods when the two projects would overlap. If the combined increase in traffic noise would exceed 5 dBA above existing levels at any time during the overlapping construction periods, the acoustic consultant shall provide details of the location and design of temporary noise barriers and/or other measures that would be required in order to shield adjacent sensitive receptors such that the combined increase in traffic noise at any receptor would not exceed 5 dBA above existing levels. C. A cost-sharing agreement between the two project proponents for implementation of required shielding measures. 	
<p>Mitigation <u>C-MM-TRA-4: Coordination of Traffic Control Plans</u></p>	
<p>In the event that the construction period for the Project overlaps with the construction period for future development on the adjacent Fellowship Plaza property, the Project Applicant and its construction contractor shall coordinate closely with the developer and contractor for that project to develop a combined construction traffic control plan addressing the combined impacts of temporary disruptions to Odd Fellows Drive and San Marcos Road and the secondary emergency access points between Odd Fellows Drive and Chester Avenue. The combined plan shall be submitted to the City for review and approval, and shall be implemented by the Project Applicant and its contractors throughout the duration of overlapping construction. The combined plan shall contain, but not be limited to, the same contents described in MM-TRA-3a, but pertaining to construction of both projects.</p>	
<p>Impact MFS-3: Direct or Indirect Adverse Effects on Human Beings</p>	
<p>The impact would be no impact, less than significant, or less than significant with mitigation for all resource topics impacting humans.</p>	Before Mitigation: PS
<p>Mitigation: <u>MM-NOI-1a and MM-NOI-1b</u> (detailed above)</p>	After Mitigation: LTSM

Source: Prepared by AECOM.

Acronyms: LTS = less than significant impact; LTSM = less than significant with mitigation; LTCC = less than cumulatively considerable; NI = no impact; PS = potentially significant; S&U = significant and unavoidable; N/A = not applicable.