Stratford Preparatory School Project
Initial Study and Draft
Mitigated Negative Declaration

Prepared For:

City of Milpitas
455 East Calaveras Boulevard
Milpitas, California 95035

Prepared By:

Impact Sciences, Inc.
811 W. 7th Street, Suite 200
Los Angeles, California 90017

May 2024

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF TABLES

LIST OF TABLES (continued)

1.0 INTRODUCTION

1.1 INITIAL STUDY

Pursuant to Section 15063 of the California Environmental Quality Act (CEQA) Guidelines (Title 14, California Code of Regulations, Sections 15000 et seq.), an initial study is a preliminary environmental analysis that is used by the lead agency (the public agency principally responsible for approving or carrying out the proposed project) as a basis for determining whether an environmental impact report, a mitigated negative declaration, or a negative declaration is required for a project. The *State CEQA Guidelines* require that an initial study contain a project description, description of the existing setting, identification of environmental effects by checklist or other similar form, explanation of environmental effects, discussion of mitigation for significant environmental effects, evaluation of the project's consistency with existing, applicable land use controls, and the name of persons who prepared the study.

The purpose of this Initial Study is to evaluate the potential environmental impacts of the proposed Stratford Preparatory School Project (herein referenced as the "Project"). The Project would redevelop the existing office building located at 1323 Great Mall Drive into a new preparatory school. The Project would also remove the existing surface parking to construct a new 7,883-square-foot gymnasium building associated with the proposed school and a new 14,695-square-foot artificial turf playfield.

1.2 PUBLIC AND AGENCY REVIEW

This Initial Study / Proposed Mitigated Negative Declaration (IS/MND) will be circulated for public and agency review from **May 29, 2024**, to **June 28, 2024**. Copies of this document are available for review at 455 E. Calaveras Boulevard, Milpitas, California, and on the City of Milpitas' website at https://www.milpitas.gov/379/Environmental-Documents-CEQA. Comments on the IS/MND must be received no later than 5:00 P.M. on **June 28**, **2024**, and can be mailed to:

City of Milpitas Planning Department
Avery Stark, Acting Senior Planner
455 E. Calaveras Boulevard
Milpitas, CA 95035

1.3 ORGANIZATION OF THE INITIAL STUDY

This Initial Study is organized into the following sections:

- **Section I – Introduction:** provides summary background information about the Project, including Project location, lead agency, and contact information.

- **Section II – Project Description:** includes a description of the Project, including the need for the Project and the elements included in the Project.

- **Section III – Environmental Checklist:** contains the Environmental Checklist form for each resource and presents an explanation of all checklist answers. The checklist is used to assist in evaluating the potential environmental impacts of the Project and determining which impacts, if any, need to be further evaluated in an EIR.

- **Section IV – Initial Study Preparers:** lists the names of individuals involved in the preparation of this document.

- **Appendices:** present the technical studies used in the preparation of this Initial Study.

1.4 PROJECT INFORMATION

Project Title

Stratford Preparatory School Project

Lead Agency Name and Address

City of Milpitas, Planning Department
455 East Calaveras Boulevard
Milpitas, CA 95035

Contact Person and Phone Number

Avery Stark
Acting Senior Planner
(408) 586-3288

Project Location

1323 Great Mall Drive
Milpitas, CA 95035

Project Applicant's Name and Address

Inhabit Design, Inc.
5231 45th Avenue, SW
Seattle, WA 98136

City General Plan Designation

Milpitas Metro Specific Plan – Business Park Research & Development, Limited Residential (BPRD-R)

City Zoning

Commercial (C2)

2.0 PROJECT DESCRIPTION

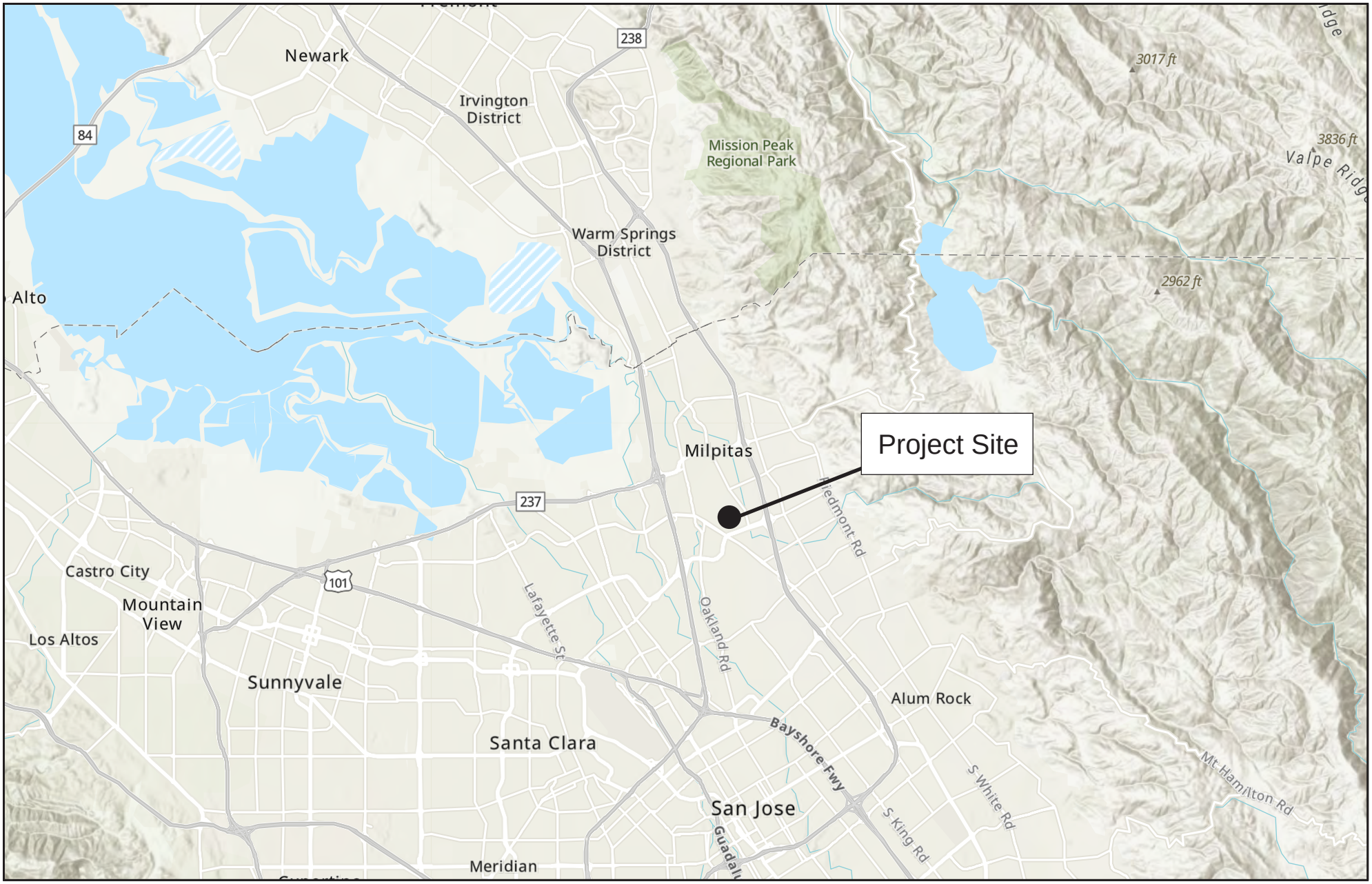
2.1 ENVIRONMENTAL SETTING

Project Location

The Stratford Preparatory School (Project) site is located at 1323 Great Mall Drive (Project Site) in the southern portion of the City of Milpitas. The Project Site (Assessor Parcel Number [APN] 086-24-046) is comprised of approximately 3-acres bounded by Great Mall Drive to the north, Falcon Drive to the east, Great Mall Parkway to the west, and the existing Stratford School to the south. The Project Site is located approximately 0.70 west of Interstate 680 (I-680), 0.90 miles west of I-880, and 428 feet north of Montague Expressway (see **Figure 2.0-1, Regional Location,** and **Figure 2.0-2, Project Site**). The Project Site is approximately 4.7 miles southeast of the San Francisco Bay.

Existing Conditions

The Project Site consists of an existing 51,740-square-foot, 2-story office building that has been vacant for many years and is surrounded by a paved surface parking lot with 183 uncovered parking spaces (see **Figures 2.0-3a** through **2.0-3f**, **Photographs of Existing Site Conditions**). The eastern perimeter of the Project Site is currently surrounded by metal fence panels. Access to the Project Site is provided via two driveways, one along Great Mall Drive and one along Falcon Drive. Sidewalks are located along the northern edge of the Project Site adjacent to Great Mall Drive. Ornamental landscaping in the form of grass medians and approximately 93 trees are present on-site. Commercial uses surround the Project Site to the north, hotel uses to the east, the existing Stratford Preparatory School to the south, and multi-family residential uses and vacant land to the west. It should be noted that the existing vacant land to the west is currently under construction and is anticipated to operate as a multi-family apartment complex by the time the Project begins operations.



SOURCE: Esri, 2023

FIGURE **2.0-1**

IMPACT SCIENCES

Regional Location

1451.002•12/23

SOURCE: Esri, 2023

FIGURE **2.0-2**

IMPACT SCIENCES

Project Site

1451.002•12/23

SOURCE: Impact Sciences, 2023

FIGURE **2.0-3a**

IMPACT SCIENCES

Photographs of Existing Site Conditions: Great Mall Parkway (View 1)

1451.002•12/23

SOURCE: Impact Sciences, 2023

FIGURE **2.0-3b**

IMPACT SCIENCES

Photographs of Existing Site Conditions: Great Mall Drive, Southwest (View 2)

1451.002•12/23

SOURCE: Impact Sciences, 2023

FIGURE **2.0-3c**

IMPACT SCIENCES

Photographs of Existing Site Conditions: Great Mall Drive, South (View 3)

1451.002•12/23

SOURCE: Impact Sciences, 2023

FIGURE **2.0-3d**

IMPACT SCIENCES

Photographs of Existing Site Conditions: Falcon Drive (View 4)

1451.002•12/23

SOURCE: Impact Sciences, 2023

FIGURE **2.0-3e**

IMPACT SCIENCES

Photographs of Existing Site Conditions: Great Mall Parkway & Centre Pointe Drive (View 5)

1451.002•12/23

SOURCE: Impact Sciences, 2023

FIGURE **2.0-3f**

IMPACT SCIENCES

Photographs of Existing Site Conditions Locations

1451.002•12/23

Existing Site Zoning and Land Use Designations

According to the General Plan Land Use Map in the *City of Milpitas General Plan 2040,* the Project Site is designated as part of the "Milpitas Metro Specific Plan" (MMSP). The MMSP is an update to the Milpitas Transit Area Specific Plan and provides a vision for the transit area, including a detailed land use and design framework, zoning framework, and public infrastructure financing tools to guide private development and public investment. According to the MMSP, the Project Site is part of the 23.6-acre Great Mall District and is designated as Business Park Research & Development, Limited Residential (BPDR-R). Under the Specific Plan, the BPDR-R supports office, office-supportive commercial retail, hotels, and limited residential uses. Surrounding uses of the Project Site are Boulevard Very High-Density Mixed Use (BVMU) to the north and west, and Business Park Research & Development (BPRD) to the west and south (see **Figure 2.0-4, Aerial View Map and Surrounding Land Uses**). Lastly, the Project Site is zoned for Commercial (C2) with a Transit Oriented Development (TOD) overlay. Parcels that immediately surround the Project Site are designated by the City as MMSP. Parcels to the north, east and south of the Project Site are zoned C2 with a TOD overlay, while parcels to the west are zoned Mixed Use (MXD3) with a TOD overlay. To address areas of nonconformity the Project will include a Development Agreement. The Development Agreement is a legally binding contract between the Project Applicant and the City that outlines the terms and conditions for the Project. This approach will ensure that any deviations from the MMSP or the Zoning Code are appropriately mitigated and managed, providing a mechanism for the City to ensure compliance with its planning objectives while accommodating the needs of the Project. Approval of the Development Agreement will be adopted as an ordinance by the City Council, as part of the Project approval process.

Project Background

The Project Site has historically been a mix of undeveloped land and agricultural uses. Until the early 1980s, the Project Site was predominantly undeveloped, except for the small-scale agricultural uses between 1948 and 1968.[1] By 1980, the Project Site was developed with a manufacturing warehouse with associated parking, and by 1987, the manufacturing plant had been demolished. By 2002, the existing on-site office building had been developed.

The Project Site is located within the Great Mall District sub-area of the MMSP. This sub-area includes the Great Mall itself and is 0.18 miles northwest of the Milpitas Transit Center. According to the MMSP, the purpose of the Great Mall District sub-area is to maintain the original Great Mall, while developing residential infill, urban scaled buildings along Great Mall Parkway, commercial buildings located close to

1 Historic Aerials, "Aerial Viewer." Available online at: https://www.historicaerials.com/viewer, accessed November 28, 2023.

the Milpitas Transit Center, a central public gathering place and linear park, and a walkable street grid. The Project Site is located in a sub-area that is intended to be preserved under the MMSP as commercial priority parcels that are ideal for higher intensity office, R&D, office-supportive retail, and hotel uses that encourage employment in the Great Mall District. As stated above, the Project Site is designated as BPDR-R under the MMSP. According to the MMSP, educational uses are an allowed use for BPDR-R parcels.

The Stratford Preparatory School is an independent private school system that offers campuses throughout California for preschool students and students grades kindergarten (K) through 12. The Stratford School system has an existing Milpitas campus located south of the Project Site. The existing Milpitas campus includes a preschool and classrooms for students grades K through 8. A total of 715 students are currently enrolled in the school, with arrival and departure times that range between 7:30 A.M. to 9:00 A.M. and 2:50 P.M. to 4:00 P.M., respectively. The existing campus employs approximately 97 faculty and staff members, and a maximum number of 85 staff members are present on campus at one time. The existing campus does not accommodate students grades 9 through 12. The proposed new Stratford School would accommodate these upper-class levels for the Stratford Preparatory School system.

2.2 PROJECT CHARACTERISTICS

Project Features

The Project Applicant proposes a new Stratford School comprised of two buildings and a playfield. The existing office building on-site will be remodeled into a two-story middle school/high school for approximately 500 students. Initial enrollment may begin in the 6th to 12th range with the intent to transition to 9th to 12th grade. The Project would also demolish the existing surface parking lot to construct a new 7,883 square foot gymnasium building that would be located west of the remodeled existing building, see **Figure 2.0-5**, **Conceptual Site Plan,** and **Table 2.0-1**, **Project Features**. Supporting rooms for the gymnasium, such as locker rooms, gymnasium storage, a gymnasium office, and restrooms will be located in the southwestern corner of the existing building. The Project would accommodate students from the existing Stratford School facility located south of the Project Site. The Project would be equipped with 41 classrooms (general/biochemistry/art/physical engineering), eight offices, four media common rooms, a library, and a theater. The proposed gymnasium building west of the school would be 42 feet in height and would mainly consist of an indoor gymnasium and a row of retractable bleachers on one side only. Architectural features for the proposed school buildings would include light exterior cosmetic refinishing, including off -white paint on the existing concrete surfaces and some painted metal panel accents at each entry canopy in Stratford's blue branding colors, as well as elegant signage for branding. The architecture of the new gymnasium building would emulate the existing school building to the south, and thus would include off-white painted concrete with relief elements forming a sense of structural and architectural bays.

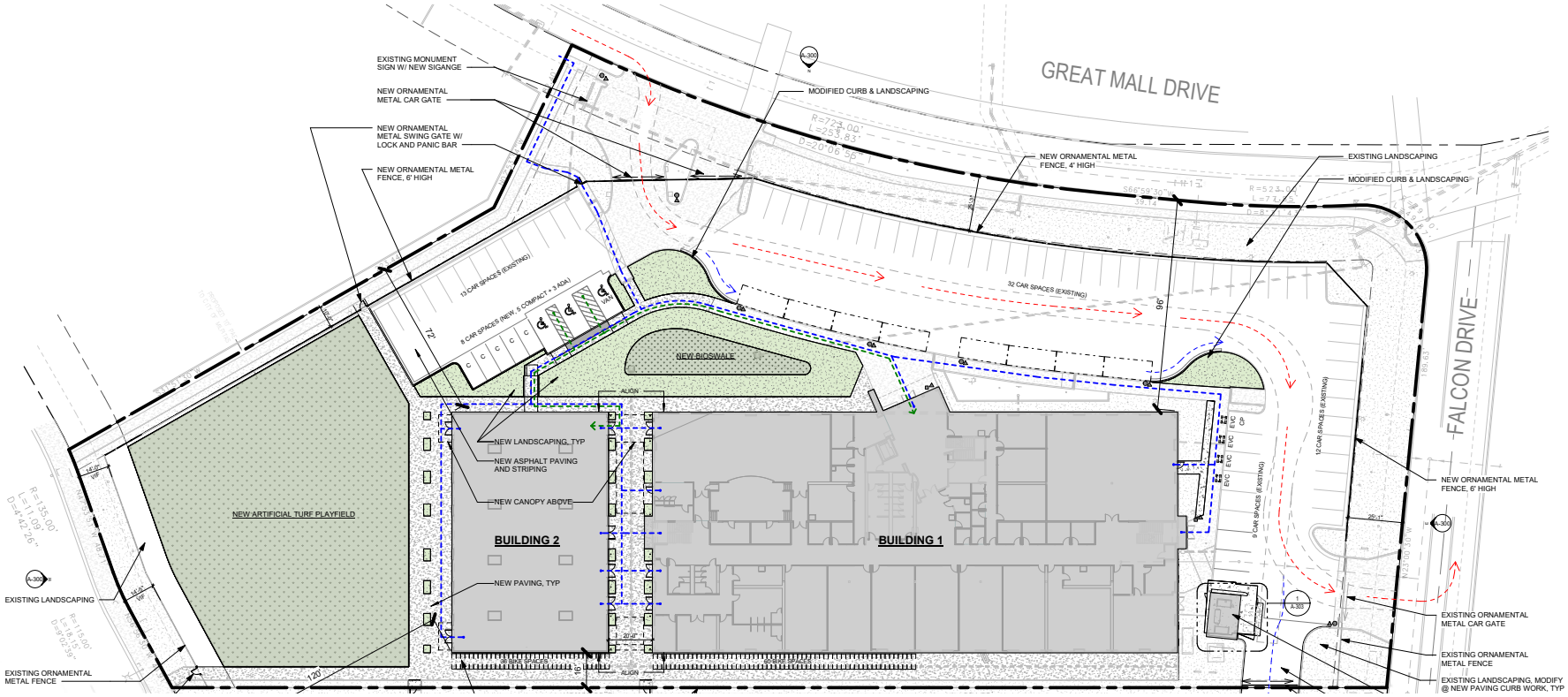
SOURCE: City of Milpitas, 2023; Esri 2023

FIGURE **2.0-4**

Aerial View Map and Surrounding Land Uses

IMPACT SCIENCES

1451.002•12/23



SOURCE: Inhabit Designs 2023

FIGURE **2.0-5**

Conceptual Site Plan

IMPACT SCIENCES

1451.002•12/23

Additionally, the Project would include supporting components, such as a new trash enclosure and a 14,695-square-foot artificial turf playfield located to the west of the new gymnasium building. The Project would also plant new shrubs, perennials, and groundcovers throughout the Project Site. Furthermore, the Project would remove 35 existing on-site trees, preserve 58 existing trees deemed to be in fair to good condition, and plant 6 new trees. The Project would also generate 0.5 pounds of solid waste per student per day which comes out to be 45.5 tons/year.

The Project would operate from Monday through Friday between the hours of 7:00 A.M. to 6:00 P.M. However, it should be noted that the school would hold occasional evening and weekend events such as basketball, volleyball, or other sports events, theater events, graduation events, and parent/teacher conferences that rarely exceed 200 people but up to a rare maximum 500 person in capacity, within the hours of 7:00 A.M. to 9:00 P.M. on weekdays and weekends.

Table 2.0-1
Project Features

Building Area	Amount	Gross Square Footage (sq. ft.)	Total Square Footage (sq. ft.)
First Floor of Existing Building			
General Classroom	2	746	4,540
General Classroom	4	762	
Music Classroom	1	894	894
Music Storage	1	194	194
Multi-Purpose Room/Theater	1	2,554	2,554
Stage	1	627	627
Control Room	1	180	180
Multi-Purpose Room Storage Room	1	180	180
Kitchen	1	180	180
Kitchen Storage	1	121	121
Office	2	107	214
Office	2	108	216
Office	1	113	113
Office	2	99	198
Staff Restroom	2	43.4	85.8
		42.4	
GN Restroom	3	47.1	141
		45.9	
		48	
Gym Storage	2	295	497
		202	
Locker Room	2	364	732
		368	

Building Area	Amount	Gross Square Footage (sq. ft.)	Total Square Footage (sq. ft.)
Boy's Restroom/Girl's Restroom (Near Gym)	2	128.3	256.6
Gym Office	1	163	163
Work Room/Curriculum Storage Room	1	331	331
Electrical Room	2	195	361
		166	
Mechanical Electrical and Plumbing	2	33	762
		729	
Library	1	2,868	2,868
Conference Room	1	342	342
Director's Office	1	224	224
Assistant Director's Office	1	154	154
Reception	1	215	215
Elevator Machine Room	1	77	77
Copy Room/Curriculum Storage Room	1	26	26
Specialty Teacher Work Room	1	364	364
Boy's Restroom (Across from General Classrooms)	1	286.5	286.5
Girl's Restroom (Across from General Classrooms)	1	280.2	280.2
Janitor's Closet	1	67	67
Sick Room	1	73	73
Mother's Room	1	72	72
Staff Lounge	1	336	336
IT Room	1	51	51
First Floor of Existing Building Total Square Footage			***18,976.1***
Second Floor of Existing Building			0
General Classroom	10 (Total)		
	1	619	6,751
	2	499	
	2	746	
	4	762	
	1	594	
Bio/Chem Classroom	4 (Total)		
	1	821	3,411
	2	885	
	1	820	
Bio/Chem Support	2	189	379
		190	
Art Classroom	2	790	1607
		817	
Art Storage	1	131	131
Graphic Arts	1	688	688
Media Commons	2	1,150	2,548
		1,398	

Building Area	Amount	Gross Square Footage (sq. ft.)	Total Square Footage (sq. ft.)
Computer Science	1	688	688
Physics/Engineering	2	563	1,350
		787	
Physics Storage	1	130	130
Kitchenette/Lounge	1	167	167
Electrical Room	2	55	221
		166	
IT Closet	1	16	16
Work Room/Curriculum Storage	1	112	112
Copy Room/Curriculum Storage	1	79	79
Utility Closet	1	76	76
Janitor's Closet	1	28	28
Boy's Restroom	2	279.8	388.2
		108.4	0
Girl's Restroom	2	275	394.6
		119.6	0
Gender Neutral Restroom	2	50.6	98.4
		47.8	
Second Floor of Existing Building Total Square Footage			***19,263.2***
Existing Building Total Square Footage			***38,239.3***[a]
New Gymnasium Building			0
Gymnasium	1	7,583	7,583
Playfield			0
Artificial Turf Playfield	1	14,695	14,695

[a] *Project features table does not include square footages for hallways, stairways, and elevators.*
Source: Inhabit Design, July 11, 2023.

Access and Parking

Vehicular access to the Project Site would be provided via the two existing driveways along Great Mall Drive and Falcon Drive. Entrances to the Project Site at both driveways would be gated, and a turn-around would be included in the northern portion of the Project Site for student drop-off/pick-up. Security personnel and cameras would be present at both of the Site's entry and exit gates. Additionally, a new gate would be provided for vehicles at the southeastern corner of the Project Site as an egress to the existing Stratford School south of the Project. Currently, the Project Site has 183 surface parking spaces for vehicles. The Project would demolish 117 of the existing parking spaces in the southwest corner of the Project Site to construct the proposed gymnasium building and playfield. The Project would preserve the remaining 66 parking spaces along the northern and eastern portions of the Project Site and construct eight new parking spaces, resulting in a total of 74 parking spaces (of these spaces four of them would be handicap accessible and four of them would include electric vehicle charging capabilities). The Project would also

utilize the existing pedestrian gate at the existing driveway along Falcon Drive. However, the Project would install five additional pedestrian gates: two along the southern perimeter, one at the southwestern corner, and two along the northern perimeter of the Project Site. Additionally, the Project would provide approximately 96 bicycle parking spaces in the form of bike racks along the on the southern edge of the Project Site.

The existing parking supply is able to accommodate the normal daily (Monday through Friday) parking demands of the proposed upper grade school (grades 6-12) and the adjacent existing lower grade school (grades 6-8). In addition, as a private school, the school is able to manage student drivers and limit students of age (grades 11-12) with assigned parking passes. Students are also required to sign a handbook confirming that they will not park within the neighborhood if they do not have a parking pass. Event timing will be scheduled between the two school sites, allowing all spaces to be available for larger events. For rare event capacities that exceed the two parking site limits, carpooling will be required, off-site parking and shuttling services will be provided, or events will be held elsewhere.

Normal daily Monday through Friday parking quantities meet the requirements for the proposed school and the adjacent existing school in quantities clarified on the code analysis drawings provided, and they are generous for the actual demand of staff that is fewer than the available spaces on site, and there are generous bike parking spaces and showers available as well.

Arrivals and departures for both the school's normal drop-off / pick-up operation and events will be managed by the Stratford Preparatory School. To monitor on-site vehicle queuing, staff members would be present at the site entry drive, entry gate, along the drop off length, and at the exit gate of the school and communicate with vehicles arriving or departing to ensure that drivers are proceeding in the correct direction. The school gates are then closed after the designated arrival and departure times, ensuring the security of the upper school campus and efficient traffic flow. The proposed security cameras would further ensure both efficient traffic circulation and safeguarded site access are maintained.

The school's protocol is to have staff with walkie talkies at the drop-off / pick-up location communicating with vehicles arriving or departing and making sure each person is proceeding in the correct direction and in a timely fashion. Security personnel are also located at the building's main entry and exit gates, ensuring that each person entering is intended to be there. Security cameras are also provided throughout the site and covering the site circulation paths to further ensure both efficient traffic circulation and safeguarded site access are maintained.

Architectural Elements

Building elevations are shown on **Figure 2.0-6, Building Elevations-School Building,** and **Figures 2.0-7**, **Building Elevations- Gymnasium**. As detailed, the proposed school building will be 35 feet in height, with protruding features that extend the building to 42 feet in height. The proposed gymnasium would be at a maximum 35 feet in height. The exterior color of both buildings would be a variety of dark blue, red, light beige, and off-white. Exterior materials for both buildings would be used would include concrete, grey brick, and spandrel glass. Additionally, metal fences would encompass the Project Site.

Utilities

The Project would connect to the existing 12-inch water main located along Great Mall Drive. The City of Milpitas would provide potable water services to the Project Site. A new 6-inch sewer line will be constructed to connect to the City's 8-inch main; and new 6inch and 8-inch storm drains will collect water and then route to a detention basin, in order to meet the Stormwater Treatment Requirements, which will then drain into a private storm drain system along Great Mall Drive. A new Recycled Water system will need to be constructed in order to provide irrigation to the landscape areas. A connection to the existing 8-inch Recycled Water Main on Falcon Drive will be established. No natural gas will be used on the Project. The Project would also install new concrete ditch lines that would drain stormwater runoff to new drainage inlets located along the northern and southern borders of the school buildings. Telecommunication distribution comes out of the existing school's Server Room and would connect to the new telecom room. The Project would require a new primary 4-inch conduit routed underground to new electric utility, pad mounted, medium voltage transformer. The new primary 4-inch conduit will be supplied from the existing switching cabinet or manhole adjacent to the property. The new utility transformer will be located inside the new equipment yard.

Exterior Lighting

An existing pole mounted lighting fixture along Great Mall Drive would be preserved for use. The Project would mount 12 new lighting fixtures on the north, east, and south perimeters of the existing building at a height of 10 feet or 20 feet above the ground. The Project would also install nine new lighting fixtures along the perimeter of the proposed gymnasium building at a height of 10 feet above the ground. The lighting plan would ensure that the exterior lighting fixtures will not result in light spillage onto adjacent properties.

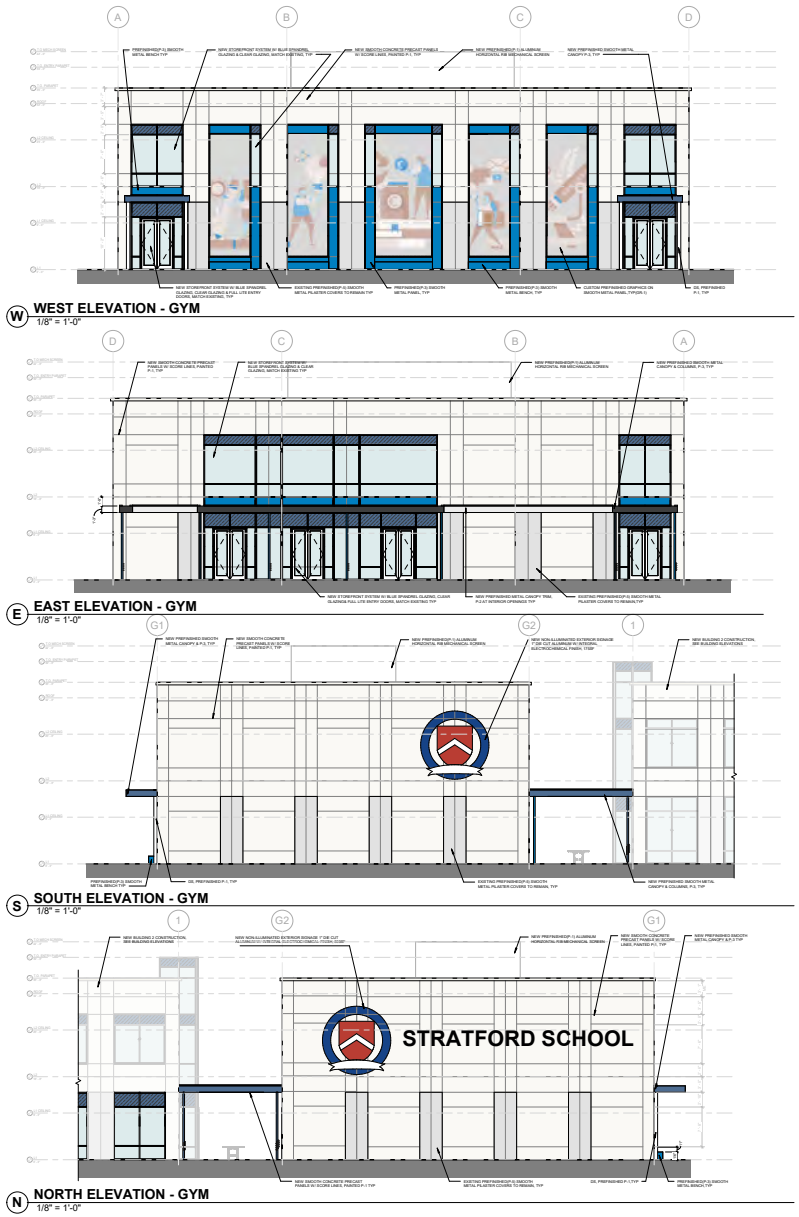
SOURCE: Inhabit Design, 2023

FIGURE **2.0-6**

Building Elevations-School Building

IMPACT SCIENCES

1451.002•12/23



SOURCE: Inhabit Design, 2023

FIGURE **2.0-7**

Building Elevations-Gymnasium

IMPACT SCIENCES

1451.002•12/23

Project Construction

For the purpose of analyzing impacts associated with construction activities, this analysis assumes a construction schedule of approximately 12 months beginning in 2024. This analysis assumes the Project will be fully operational in 2025. This assumption is conservative and yields the maximum daily impacts. Construction activities associated with the Project would be undertaken in three main steps: (1) Removal of existing surface pavement and vegetation (2 weeks), (2) grading/foundation preparation for proposed gymnasium (3 weeks), and (3) building construction for the proposed gymnasium and interior renovation of the existing building (11 months). Equipment and construction staging for the Project will take place on site.

This analysis assumes cut/fill operations would balance soil on site and no soil import or export would be required. It estimated approximately 221.5 tons of debris will be removed during the site clearing and interior renovation phases, of which 153.5 tons will be recycled.

Building construction of the proposed gymnasium would include the construction of the proposed structure, connection of utilities, architectural coatings, and paving the Project Site. Architectural coating and paving are assumed to occur over the final month of the building construction phase.

Conventional construction equipment would be used, such as excavators, backhoes, and both light- and heavy-duty trucks. Truck trips are expected to reach the Project Site via Great Mall Drive and Falcon Drive. Truck trips for off haul materials are expected to travel along these same routes and arterials to dispose of construction and demolition debris.

2.3 DISCRETIONARY ACTIONS AND APPROVALS

Discretionary entitlements, reviews, and approvals required for implementation of the Project would include, but would not necessarily be limited to, the following:

State Agencies

- State Water Resources Control Board: National Pollutant Discharge Elimination System (NPDES) Permit

Local Agencies

- City of Milpitas: Development Agreement
- City of Milpitas: Site Development Permit Review
- City of Milpitas: Conditional Use Approval

3.0 ENVIRONMENTAL CHECKLIST

A. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☒	Geology and Soils	☒	Greenhouse Gas Emissions	☐	Hazards and Hazardous Materials
☐	Hydrology and Water Quality	☐	Land Use and Planning	☐	Mineral Resources
☐	Noise	☐	Population and Housing	☐	Public Services
☐	Recreation	☐	Transportation	☒	Tribal Cultural Resources
☐	Utilities and Service Systems	☐	Wildfire	☐	Mandatory Findings of Significance

B. DETERMINATION: (to be completed by the Lead Agency)

On the basis of this initial evaluation:

I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	☐
I find that, although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the Project. A MITIGATED NEGATIVE DECLARATION will be prepared.	☒
I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	☐
I find that the Proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment., but at least effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	☐

I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.	☐

Avery Stark	Acting Senior Planner
Printed Name	**Title**
	5.29.2024
Signature	**Date**

C. ENVIRONMENTAL IMPACTS

1. Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. Substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Except as provided in Public Resources Code Section 21099, would the project:

a) Have a substantial adverse effect on a scenic vista?

Less than Significant Impact. A scenic vista is generally defined as a view of undisturbed natural characteristics exhibiting a unique feature that comprises an important or dominant portion of the viewshed. Although scenic vistas are identified at the discretion of its jurisdiction, common examples of scenic vistas include open hillsides, mountain ranges, rivers/streambeds, and large bodies of water.

The City of Milpitas considers both natural and man-made resources including hillsides, ridges, visually significant vegetation, and other elements that are critical in shaping the City's scenic identity as scenic resources.[1] Due to its location, the existing obstructing trees and structure on-site, and the surrounding uses, the Project Site allows for partial views of the open hillsides located to the east. These views are made available for pedestrians, bicyclists, and vehicles travelling along Great Mall Parkway.

Public viewsheds include the open hillsides, partial views of the existing buildings, several trees, and the existing surface parking lot located within the northwest corner of the Project Site. Implementation of the

1 City of Milpitas, *City of Milpitas General Plan Environment Impact Report*, November 2020. Available online at: https://www.milpitas.gov/DocumentCenter/View/1344/Draft-EIR-final-edits-PDF?bidId=, accessed December 12, 2023.

Project would include removal of this surface parking lot and construction of a new turf playfield in its place. This use is not anticipated to introduce new obstructions to the public views of the open hillsides. The Project would also construct a new gymnasium building that would be visible within this public viewshed. However, the height and size of the proposed gymnasium would be smaller than the existing building and would not further obstruct the existing views of the open hillsides. Furthermore, the Project would remove some of the existing on-site trees that are currently obstructing the views of the hillsides, making the scenic resource more visible. For these reasons, Project implementation would result in less than significant impacts to scenic vistas.

Mitigation Measures: No mitigation measures are required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

No Impact. There are no designated or eligible State scenic highways located near the Project Site or within its immediate vicinity. The nearest designated, or eligible for designation, State scenic highway is Interstate 680 (I-680) beginning at post mark 6.1 and ending at post mark R6.4 in the City of Fremont. This segment is located approximately 4.07 miles northwest of the Project Site.[2] Due to the distance of the Project Site to this segment, topography, and intervening landscape, trees, and structures, the Project Site is not within or visible from any existing designated (or eligible) scenic highways. Thus, the Project would not result in impacts to a scenic resource within a state scenic highway.

Mitigation Measures: No mitigation measures are required.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. The Project Site is located in an urbanized area of the City that has been highly disturbed. Thus, for the purpose of this threshold, the Project's potential to conflict with applicable zoning and other regulations governing scenic quality is evaluated.

Although the construction activities associated with the Project would result in changes to the visual quality in the Project Site vicinity, these activities would be temporary and would cease upon completion

2 California Department of Transportation (Caltrans), "California State Scenic Highways." Available online at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed December 12, 2023.

of Project construction. Project development would be in accordance with all applicable City design guidelines and standards, including those outlined in the MMSP. Project plans would be subject to City review and approval prior to construction. Furthermore, the redevelopment of the existing office building would implement exterior building materials, architectural styles, and color that are compatible with the existing Stratford Preparatory School located south of the Project Site. The proposed gymnasium would also be constructed with similar building materials and colors. As such, the Project would not substantially degrade the existing visual character or quality of the site or its surroundings, and the Project would not conflict with applicable zoning and other regulations governing scenic quality. Project impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d) C*reate a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Less than Significant Impact. Light emanating from building interiors that pass-through windows and light from exterior sources (i.e., street lighting, parking lot lighting, field lighting, building illumination, security lighting, and landscape lighting) serve as primary sources of light.

The Project Site is located within an urban and developed area and is surrounded by commercial, institutional, hotel, and residential uses. The residential uses include vacant land that is currently under construction and will operate as an apartment complex by the time the Project begins operations.

Project construction may require the use of temporary lighting during evening hours. However, construction activities associated with the Project would adhere to Section V-213-3 (Unlawful to Create or Permit Disturbing Noise) of the City's Municipal Code, which requires construction activities to be limited to occur between the hours of 7:00 A.M. and 7:00 P.M. on weekdays and weekends. No construction activities are permitted on holidays. As such, lighting for short-term construction activities would cease at 7:00 p.m.

Project implementation would increase the exterior nighttime lighting on-site to accommodate the proposed school use. Specifically, the Project would install exterior lighting fixtures that would be mounted on the proposed school building and gymnasium building. While the proposed school's typical weekday activities on-site would cease by 6:30 P.M., the school is anticipated to have occasional events on-site that may cease by 9:00 P.M. However, any light spillover emitted to the west of the Project Site would be obstructed by the existing on-site trees and overhead transit line. Additionally, the Project would adhere to Section XI-10-57.17 (Lighting) of the Milpitas Municipal Code and ensure that all exterior lighting is shielded and uses minimum wattage to reduce visibility off-site. As such, the new lighting introduced by

the Project would not result in a substantial increase in light that could adversely affect nighttime views in the area. Therefore, the Project's impacts regarding light and glare would be less than significant.

Mitigation Measures: No mitigation measures are required.

2. Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest Range and Assessment Project and Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (CARB). Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. According to the California Department of Conservation's California Important Farmland Finder, the Project Site is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[3] Further, the Project Site is zoned for Commercial (C2) with a Transit Oriented Development (TOD) overlay, and according to the MMSP, the Project Site is part of the 23.6-acre Great Mall District and is designated as Business Park Research & Development, Limited Residential (BPDR-R). Thus, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. No impact would occur.

Mitigation Measures: No mitigation measures are required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. As stated above, the Project Site is zoned C2 and designated as BPDR-R. The existing zoning does not include any agricultural-related zoning designations, nor is the site part of a Williamson Act contract.[4] Additionally, the land uses surrounding the Project Site are not zoned for agricultural uses or in a Williamson Act contract. Therefore, Project implementation would not conflict with existing zoning for agricultural use, or a Williamson Act contract. No impact would occur.

Mitigation Measures: No mitigation measures are required.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The Project Site is not zoned or used for forest land or timberland purposes and is not zoned Timberland Production. Further, Project implementation would not result in the rezoning of forest land, timberland, or timberland zoned Timberland Production. Therefore, no impact would occur.

---

3 California Department of Conservation, "California Important Farmland Finder," Available online at: https://maps.conservation.ca.gov/dlrp/ciff/, Accessed December 8, 2023.

4 California Department of Conservation, *The Williamson Act Status Report*, 2022. Available online at: https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2022%20WA%20Status%20Report.pdf, accessed December 8, 2023.

Mitigation Measures: No mitigation measures are required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As stated above, the Project Site is not occupied by or used for forest land. Therefore, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As the Project would occur within a highly developed and urban area, Project implementation would not result in the conversion of farmland or forest land to non-agricultural/non-forest land use. No impact would occur.

Mitigation Measures: No mitigation measures are required.

3. Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Violate any air quality standard or result in a cumulatively considerable net increase in an existing or projected air quality violation?	☐	☒	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?	☐	☐	☒	☐

Air Quality Setting

Bay Area Air Quality Management District (BAAQMD)

BAAQMD is the primary agency responsible for assuring that the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) are attained and maintained in the Bay Area. BAAQMD's jurisdiction includes all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo and Santa Clara counties, and the southern portions of Solano and Sonoma counties. The Air District's responsibilities in improving air quality in the region include: preparing plans for attaining and maintaining air quality standards; adopting and enforcing rules and regulations; issuing permits for stationary sources of air pollutants; inspecting stationary sources and responding to citizen complaints; monitors air quality and meteorological conditions; awarding grants to reduce mobile emissions; implementing public outreach campaigns; and assisting local governments in address climate change.

The BAAQMD recommends that all proposed projects implement the following Basic Management Practices for Construction Related Fugitive Emissions:[5]

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.

---

5 Bay Area Air Quality Management District, *BAAQMD CEQA Guidelines, see Table 5-2*. 2022. Available online at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

3. All visible mud or dirt track-out onto adjacent 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 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. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.

7. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.

8. Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.

9. Publicly visible signs shall be posted with the telephone number and name of the 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 General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

Local

City of Milpitas General Plan

The *City of Milpitas 2040 General Plan* (General Plan) is a planning document that defines a long-term vision for the City over the next 20 years. The City of Milpitas updated and adopted its current *General Plan* in March 2021. Applicable goals and policies related to air quality from the City of Milpitas General Plan (General Plan) Air Quality Element are listed below:[6]

Goal CON-7: Implement a proactive approach to maintain and improve air quality within Milpitas and the region.

Policy CON 7-1: Ensure that land use and transportation plans support air quality goals through a logical development pattern that focuses growth in and around existing urbanized areas, locates new housing near places of employment, encourages

6 City of Milpitas. *General Plan 2040 City of Milpitas*. 2021. Available online at: https://www.milpitas.gov/DocumentCenter/View/1147/Milpitas-2040-General-Plan-PDF?bidId=, accessed December 19, 2023.

alternative modes of transportation, supports efficient parking strategies, reduces vehicle miles traveled, and requires projects to mitigate significant air quality impacts.

Policy CON 7-2: Minimize exposure of the public to toxic or harmful air emissions and odors through requiring an adequate buffer or setback distance between residential and other sensitive land uses and land uses that typically generate air pollutants, toxic air contaminants, or obnoxious fumes or odors, including but not limited to industrial, manufacturing, and processing facilities, high-volume roadways, and industrial rail lines. New sensitive receptors, such as residences (including residential care and assisted living facilities for the elderly), childcare centers, schools, playgrounds, churches, and medical facilities shall be located away from existing point sources of air pollution such that excessive levels of exposure do not result in unacceptable health risks. Compliance shall be verified through the preparation of a Health Risk Assessment when deemed necessary by the Planning Director.

Policy CON 7-3: Require projects which generate high levels of air pollutants, such as heavy industrial, manufacturing facilities and hazardous waste handling operations, to incorporate air quality mitigations in their design to reduce impacts to the greatest extent feasible.

Policy CON 7-4: Require projects to adhere to the requirements of the BAAQMD.

Policy CON 7-5: Use the City's development review process and the California Environmental Quality Act (CEQA) to evaluate and mitigate the local and cumulative effects of new development on air quality.

Policy CON 7-6: Coordinate with CARB and the BAAQMD to properly measure air quality emission sources and enforce the standards of the Clean Air Act.

Policy CON 7-7: Comply with regional, state, and federal standards and programs for control of all airborne pollutants and noxious odors, regardless of source.

Policy CON 7-8: Consider the health risks associated with Toxic Air Contaminants (TACs) when reviewing development applications.

Policy CON 7-9: Coordinate with Santa Clara County and nearby cities to implement regional GHG reduction plans and to consolidate efforts to reduce GHGs throughout the county as appropriate.

Policy CON 7-10: Implement policies and action from the Land Use and Circulation Elements to provide mixed-use developments, locate high-density uses near transit facilities, provide neighborhood-serving retail uses convenient to residential neighborhoods, and other Transportation Demand Management (TDM) programs that would reduce vehicle trips and vehicle miles traveled, thus reducing air-pollutant emissions.

Policy CON 7-11: Encourage improvements and design features that reduce vehicle delay such as bus turnouts, and synchronized traffic signals for new development to reduce excessive vehicle emissions caused by idling.

Policy CON 7-12: Encourage and prioritize infrastructure investments and improvements that promote safe walking, bicycling and increased transit ridership.

Policy CON 7-13: Implement energy policies and actions that have co-benefits of reduced air pollution and greenhouse gases by increasing energy efficiency, conservation, and the use of renewable resources.

BAAQMD Thresholds

The BAAQMD CEQA Air Quality Guidelines (BAAQMD Guidelines)[7] set forth methodologies and quantitative significance thresholds that a lead agency may use to estimate and evaluate the significance of a project's air emissions, see **Table 3.3-1, Bay Area Air Quality Management District Regional Significance Thresholds**. The BAAQMD has also established significance thresholds for the excess health risks posed to nearby sensitive receptors, see **Table 3.3-2, Health Risk Significance Thresholds.**

7 Bay Area Air Quality Management District. *BAAQMD CEQA Guidelines*. 2022. Available online at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines; accessed February 1, 2024.

Table 3.3-1
Bay Area Air Quality Management District Regional Significance Thresholds

Pollutant	Construction-Related	Operational-Related	
	Average Daily Emissions (lbs/day)	Average Daily Emissions (lbs/day)	Maximum Annual Emissions (tpy)
ROG	54	54	10
NOx	54	54	10
PM10	82 (exhaust)	82	15
PM2.5	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 (1-hour average)	
Fugitive Dust	Best Management Practices	None	

Source: BAAQMD. CEQA Guidelines. Available online at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

Table 3.3-2
Health Risk Significance Thresholds

Health Risks and Hazards	Single Sources Within 1,000-foot Zone of Influence	Combined Sources (Cumulative from all sources within 1,000-foot zone of influences)
Excess Cancer Risk	>10 per one million	>100 per one million
Hazard Index	>1.0	>10.0
Incremental Annual PM2.5	>0.3 ug/m3	>0.8 ug/m3

Source: BAAQMD. CEQA Guidelines. Available online at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

Methodology

Construction and operational criteria air pollutant emissions were calculated in the California Emissions Estimator Model (CalEEMod) and were compared to the BAAQMD's significance thresholds. Average daily emissions from Project construction and operation were calculated, including both on-site and off-site activities.

The analysis examines temporary construction emissions, long-term operational emissions, localized pollutant concentrations, TACs, and odors. Common sources of construction emissions include heavy-duty off-road construction equipment exhaust, fugitive dust, and architectural coatings. Sources of operational emissions include the use of consumer products, motor vehicle trips attracted to or generated by a land

use, and on-site combustion of natural gas. Consistent with the requirements of CEQA, this analysis reflects a best-effort approach to disclose all reasonably foreseeable impacts based on currently available information.

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The most recent clean air plan is the Bay Area 2017 Clean Air Plan that was adopted by BAAQMD in April 2017. The Plan includes control measures that are intended to reduce air pollutant emissions in the Bay Area either directly or indirectly. Projects that are consistent with the development of a regional or local air quality plan are considered not to conflict with the attainment of air quality standards identified in the plan.

Consistency with the air quality plan can be determined through evaluation of project-related air quality impacts and demonstration that project-related emissions would not increase the frequency or severity of existing violations or contribute to a new violation of the national ambient air quality standards. The BAAQMD CEQA Air Quality Guidelines include thresholds of significance that are applied to evaluate regional impacts of project-specific emissions of air pollutants and their impact on BAAQMD's ability to reach attainment. Emissions that are above these thresholds have not been accommodated in the air quality plans and would not be consistent with the air quality plans. The Project would not conflict with the latest 2017 Clean Air Plan since emissions would not exceed BAAQMD thresholds, (see **Table 3.3-1** and **Table 3.3-2** above). Therefore, the Project would not conflict with or obstruct implementation of the applicable air quality plan and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) 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?

Less Than Significant Impact with Mitigation Incorporated. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds, or if project-related emissions would substantially contribute to an existing or project air quality violation. To determine Project significance, emissions were compared to the BAAQMD construction and operational air quality thresholds.

Construction Emissions

Construction associated with the Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the Project vicinity include ozone-precursor pollutants (i.e.,

ROG and NOx), PM10, and PM2.5. Construction-generated emissions are short term and of temporary duration, lasting only when construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the BAAQMD's thresholds of significance.

Construction activities associated with the Project would be undertaken in three main steps: (1) Removal of existing surface pavement and vegetation (2 weeks), (2) grading/foundation preparation for proposed gymnasium (3 weeks), and (3) building construction for the proposed gymnasium and interior renovation of the existing building (11 months). Equipment and construction staging for the Project will take place on-site. Paving and architectural coating is assumed to overlap with the final month of building construction phase. Project construction is anticipated to begin in 2024 with Project operations beginning in 2025.

Construction activities would generate emissions of ozone precursors (ROG and NO_x), CO, and dust (PM10, and PM2.5). Construction activity under the Project has the potential to create air quality impacts through emissions produced by the use of heavy-duty construction equipment and by vehicle trips generated by construction worker commuting, construction vendor material deliveries, and haul truck trips to and from Project Site. Fugitive dust (PM10 and PM2.5) emissions would primarily result from demolition and grading activities. NO_X emissions, a precursor emission to ozone, would primarily result from the use of construction equipment. During the finishing phases, paving operations and the application of architectural coatings (e.g., paints) and other building materials would release ROGs, the other precursor emission to O_3. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions.

Construction-generated emissions associated with the Project were calculated using CalEEMod. Predicted average daily construction-generated emissions for the Project are summarized in **Table 3.3-3, Construction-Related Criteria Pollutant and Precursor Emissions – Average Daily Emissions**. As shown in **Table 3.3-3**, the average daily emissions generated during the construction of the Project would not exceed the BAAQMD construction emission thresholds. Therefore, impacts associated with construction emissions are considered less than significant.

Table 3.3-3
Construction-Related Criteria Pollutant and Precursor Emissions – Average Daily Emissions

Construction Year	ROG	NOx	CO	SO_2	PM10	PM2.5
2024	0.23	2.26	2.70	< 0.05	0.21	0.14
2025	0.46	2.22	3.01	0.01	0.11	0.09
Regional Threshold	**54**	**54**	**None**	**None**	**82**	**54**
Exceed?	*No*	*No*	*No*	*No*	*No*	*No*

*Source: Impact Sciences January 2024. See **Appendix A, Air Quality and Greenhouse Gas Data**. While the BAAQMD thresholds of significance identify particulate matter thresholds for exhaust only, this table has conservatively presented the total (exhaust and dust) particulate matter emissions.*

Operational Emissions

Operational air pollutant emissions would be generated primarily by automobiles driven to drop off and pick up students. Other sources of operational emissions include architectural coatings and maintenance products, consumer products, and energy use at the Project Site. CalEEMod was used to estimate emissions from operation of the Project. The operational air quality emissions were compared against BAAQMD thresholds to determine Project significance.

Emissions associated with vehicle travel depend on the year of analysis as emission control technology requirements are phased-in over time. Therefore, the earlier the year analyzed in the model, the higher the emission rates used by CalEEMod. The earliest year the Project could possibly be fully operational would be 2025. Emissions associated with build-out later than 2025 would be lower, as newer vehicles must meet increasingly more stringent emissions standards, while older, more polluting, vehicles are less utilized.

CalEEMod allows the user to enter specific vehicle trip generation rates. According to the Project's transportation engineer, the Project will generate approximately 1,965 vehicle trips per day.[8] The long-term operational emissions attributable to the Project are summarized in **Table 3.3-4, Estimated Operational Emissions**.

8 Hexagon Transportation Consultants, Inc., *1323 Great Mall Drive Stratford School, Traffic Operations Analysis*, January 8, 2024. Report available on file with the City Planning Department.

Table 3.3-4
Estimated Operational Emissions

Emissions Source	ROG	NOx	CO	SO_2	PM10	PM2.5
Average Daily Emissions (lbs./day)						
Mobile	4.74	4.31	39.4	0.10	9.46	2.44
Area	1.66	0.02	1.28	< 0.02	< 0.02	< 0.02
Energy	0.04	0.66	0.56	< 0.02	0.05	0.05
Total Average Daily Operational Emissions	**6.40**	**4.99**	**41.24**	**0.14**	**9.53**	**2.51**
Average Daily Emissions Thresholds (lbs./day)	54	54	None	None	82	54
Exceed Thresholds?	*No*	*No*	*NA*	*NA*	*No*	*No*
Annual Emissions (tons/year)						
Mobile Source	0.87	0.79	7.19	0.02	1.73	0.45
Area Source	0.30	< 0.02	0.23	< 0.02	< 0.02	< 0.02
Energy Source	< 0.02	0.12	0.10	< 0.02	< 0.02	< 0.02
Total Annual Operational Emissions (tons/year)	**1.19**	**0.93**	**7.52**	**0.06**	**1.77**	**0.49**
Annual Thresholds (tons/year)	10	10	None	None	15	10
Exceed Thresholds?	*No*	*No*	*NA*	*NA*	*No*	*No*

*Source: Impact Sciences January 2024. See **Appendix A**. While the BAAQMD thresholds of significance identify particulate matter thresholds for exhaust only, this table has conservatively presented the total (exhaust and dust) particulate matter emissions.*
Area and energy emissions for the existing building and the new gymnasium were calculated together.

As shown in **Table 3.3-3** and **Table 3.3-4**, neither the Project's construction nor operational emissions would exceed the BAAQMD's thresholds for any criteria air pollutants. Furthermore, as for cumulative construction and operational impacts, the Project will not produce cumulatively considerable emissions of nonattainment pollutants since the Project will not exceed regional thresholds. Furthermore, consistent with BAAQMD requirements, the Project would implement **Mitigation Measure AQ-1**. As such, the Project will result in a less than significant impact with mitigation.

Mitigation Measures: While impacts would be less than significant without mitigation, the BAAQMD requires the implementation of the BAAQMD Basic Best Management Practices for Construction-Related Fugitive Dust Emissions and would ensure impacts remain less than significant.

AQ-1 The following BAAQMD Basic Best Management Practices for Construction-Related Fugitive Dust Emissions shall be implemented:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the 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 General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Based on the BAAQMD CEQA Guide, a significant impact may occur if a project were to generate pollutant concentrations to a degree that would significantly affect sensitive receptors.

Construction

Project impacts related to increased community risk could occur by introducing a new source of localized pollutants during construction and operation with the potential to adversely affect existing sensitive receptors in the Project vicinity. A sensitive receptor is defined by the BAAQMD as the following: "facilities

or land uses that include member of the population that are particularly sensitive to the effects of air pollutant, such as children, the elderly, and people with illnesses. Examples include schools, hospitals, and residential areas." The BAAQMD recommends assessing the potential impacts within 1,000 feet of the Project site in all directions. The closest sensitive receptors include:

- The existing Stratford school adjacent to the south of the Project Site.
- Existing vacant land approximately 551 feet to the west that is currently under construction and is anticipated to operate as a multi-family apartment complex by the time the Project begins operations.
- Centre Pointe Drive Apartments located 511 feet to the west of the Project Site.
- Capitol Apartments 645 feet to the south of the Project Site.

The primary sources of potential TACs under the Project would be construction activity and the associated generation of diesel particulate matter (DPM) emissions from the use of off-road diesel equipment required for demolition, grading, paving, and other construction activities. The amount to which nearby sensitive receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk. Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

Construction of the Project, particularly the new gymnasium, would not have the potential to generate large amounts of DPM since a minimal amount of daily heavy construction equipment will be utilized and the overall construction duration would be short (approximately 12 months). Furthermore, as shown in more detail in Appendix A, the low levels of diesel exhaust would primarily be emitted during demolition and grading phases, which are anticipated to last only one month total. Average daily diesel exhaust emissions generated on-site during the 11 months of building construction would be negligible (i.e., less than 0.07 pounds per day). Emissions generated from the development of the new gymnasium are temporary and localized and would cease upon completion of construction. Furthermore, while it is noted that school operations occur directly south of the Project Site, health impacts associated with diesel exhaust are primarily a chronic risk, which means the receptor would need to be exposed to the pollutant for extended periods of time to potentially experience significant health risks (such as a resident in the same location for 30 years). As students are only on-campus during school hours and because diesel exhaust emissions would be low and short term, the Project would not have the potential to expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant.

Operation

Project-operation impacts related to increased health risk can occur either by introducing a new source of TACs with the potential to adversely affect existing sensitive receptors, or by introducing a new sensitive receptor, such as a residential use, in proximity to an existing source of TACs.

The Project does not include any stationary sources of TAC emissions and most Project vehicles would operate on gasoline and not diesel, which is the primary source of TACs and DPM. Therefore, operation of the Project would not generate TAC or PM2.5 emissions that could affect the health of the community near the Project Site. Furthermore, the Project Site does not lie within 1,000 feet of any stationary sources or major roadways that would expose future students to TAC emissions.[9] As such, the Project would not contribute to human health risk to nearby receptors during operation, and the Project would also not contribute to any cumulative human health risk impact.

Carbon Monoxide Hotspots. The BAAQMD's CEQA Guidelines include screening criteria for localized carbon monoxide (CO) concentrations. The BAAQMD Guidelines state that a proposed project would be considered to have a less than significant CO concentration if:

1. Project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.

2. The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.

3. The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

The Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. According to the Project's transportation engineer, existing traffic volumes conditions at the busiest intersection, Great Mall Drive and Falcon Drive, generates 3,200 daily trips, with 1,055 vehicle trips occurring during the AM peak hour, 1,088 during school PM peak hour, and 1,057 vehicle trips during PM peak hour. The Project is estimated to generate an increase of 1,965 daily trips, with 835 vehicle trips occurring during the AM peak hour, 485 vehicle trips during the school PM peak hour, and 240 vehicle

9 BAAQMD. *Permitted Stationary Sources Risk and Hazards*. Available online at: https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=2387ae674013413f987b1071715daa65, accessed February 1, 2024.

trips during the PM peak hour.[10] Thus, the daily trips generated from the Project combined with the existing traffic volumes at the busiest intersection would not have the potential to increase traffic volumes at affected intersections to more than 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizonal mixing is substantially limited. Therefore, the Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards. Impacts with respect to localized CO concentrations would be less than significant.

Mitigation Measures: No mitigation measures are required.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. The BAAQMD CEQA Guidelines identify certain land uses as sources of odors. These land uses include wastewater treatment plants, food processing facilities, composting facilities, petroleum refineries, chemical manufacturing, landfills, dairies, and fiberglass manufacturing. The Project would not include any of the land uses that have been identified by the BAAQMD as odor sources.

Construction activities associated with the Project may generate detectable odors from heavy-duty equipment exhaust and architectural coatings. However, construction-related odors would be short-term in nature and cease upon buildout. In addition, the Project would be required to comply with the California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes. This would reduce the detectable odors from heavy-duty equipment exhaust. Any odor impacts to existing adjacent land uses would be short-term and not substantial. As such, the Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people and this impact would be less than significant.

Mitigation Measures: No mitigation measures are required.

---

10 Hexagon Transportation Consultants, Inc., *1323 Great Mall Drive Stratford School, Traffic Operations Analysis*, January 8, 2024. Report available on file with the City Planning Department.

4. Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Would the project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less than Significant Impact with Mitigation Incorporated. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the state or federal regulatory agencies cited above. A search using the California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB) determined that there are 71 special-status species that may potentially occur in the vicinity the Project Site (see **Table 3.4-1**, **Potentially Occurring Special-Status Species**).

Table 3.4-1
Potentially Occurring Special-Status Species

Element Type	Scientific Name	Common Name	Federal Status	State Status	Quadrangle
Fauna	*Ambystoma californiense pop. 1*	California tiger salamander - central California DPS	Threatened	Threatened	Milpitas
	Rana boylii pop. 4	foothill yellow-legged frog - central coast DPS	Threatened	Endangered	Milpitas
	Rana draytonii	California red-legged frog	Threatened	None	Milpitas
	Accipiter striatus	sharp-shinned hawk	None	None	Milpitas
	Aquila chrysaetos	golden eagle	None	None	Milpitas
	Circus hudsonius	northern harrier	None	None	Milpitas
	Elanus leucurus	white-tailed kite	None	None	Milpitas
	Haliaeetus leucocephalus	bald eagle	None	None	Milpitas
	Ardea alba	great egret	None	None	Milpitas
	Ardea herodias	great blue heron	None	None	Milpitas
	Egretta thula	snowy egret	None	None	Milpitas
	Nycticorax nycticorax	black-crowned night heron	None	None	Milpitas
	Charadrius nivosus nivosus	western snowy plover	None	None	Milpitas
	Coccyzus americanus occidentalis	western yellow-billed cuckoo	None	None	Milpitas
	Falco columbarius	merlin	Threatened	None	Milpitas
	Falco peregrinus anatum	American peregrine falcon	Threatened	Endangered	Milpitas
	Agelaius tricolor	tricolored blackbird	None	None	Milpitas
	Icteria virens	yellow-breasted chat	Delisted	Delisted	Milpitas

Element Type	Scientific Name	Common Name	Federal Status	State Status	Quadrangle
	Lanius ludovicianus	loggerhead shrike	None	Threatened	Milpitas
	Hydroprogne caspia	Caspian tern	None	None	Milpitas
	Larus californicus	California gull	None	None	Milpitas
	Rynchops niger	black skimmer	None	None	Milpitas
	Geothlypis trichas sinuosa	saltmarsh common yellowthroat	None	None	Milpitas
	Setophaga petechia	yellow warbler	None	None	Milpitas
	Melospiza melodia pusillula	Alameda song sparrow	None	None	Milpitas
	Passerculus sandwichensis alaudinus	Bryants savannah sparrow	None	None	Milpitas
	Nannopterum auritum	double-crested cormorant	None	None	Milpitas
	Coturnicops noveboracensis	yellow rail	None	None	Milpitas
	Laterallus jamaicensis coturniculus	California black rail	None	None	Milpitas
	Rallus obsoletus obsoletus	California Ridgways rail	None	None	Milpitas
	Athene cunicularia	burrowing owl	None	Threatened	Milpitas
	Empidonax traillii	willow flycatcher	Endangered	Endangered	Milpitas
	Lepidurus packardi	vernal pool tadpole shrimp	None	None	Milpitas
	Lavinia exilicauda exilicauda	Sacramento hitch	None	Endangered	Milpitas
	Hysterocarpus traskii traskii	Sacramento-San Joaquin tule perch	Endangered	None	Milpitas
	Spirinchus thaleichthys	longfin smelt	None	None	Milpitas
	Entosphenus tridentatus	Pacific lamprey	None	None	Milpitas
	Oncorhynchus mykiss irideus pop. 8	steelhead - central California coast DPS	Candidate	Threatened	Milpitas
	Oncorhynchus tshawytscha pop. 13	chinook salmon - Central Valley fall / late fall-run ESU	None	None	Milpitas
	Bombus caliginosus	obscure bumble bee	Threatened	None	Milpitas
	Bombus crotchii	Crotch bumble bee	None	None	Milpitas
	Bombus occidentalis	western bumble bee	None	None	Milpitas
	Neotoma fuscipes annectens	San Francisco dusky-footed woodrat	None	Candidate Endangered	Milpitas
	Reithrodontomys raviventris	salt-marsh harvest mouse	None	Candidate Endangered	Milpitas
	Enhydra lutris nereis	southern sea otter	None	None	Milpitas

Element Type	Scientific Name	Common Name	Federal Status	State Status	Quadrangle
	Taxidea taxus	American badger	Endangered	Endangered	Milpitas
	Sorex vagrans halicoetes	salt-marsh wandering shrew	Threatened	None	Milpitas
	Corynorhinus townsendii	Townsends big-eared bat	None	None	Milpitas
	Myotis yumanensis	Yuma myotis	None	None	Milpitas
	Tryonia imitator	mimic tryonia (=California brackishwater snail)	None	None	Milpitas
	Gonidea angulata	western ridged mussel	None	None	Milpitas
	Anniella pulchra	Northern California legless lizard	None	None	Milpitas
	Emys marmorata	western pond turtle	None	None	Milpitas
Vegetation	*Northern Coastal Salt Marsh*	Northern Coastal Salt Marsh	None	None	Milpitas
Flora	*Eryngium aristulatum var. hooveri*	Hoovers button-celery	None	None	Milpitas
	Centromadia parryi ssp. congdonii	Congdons tarplant	None	None	Milpitas
	Lasthenia conjugens	Contra Costa goldfields	Endangered	None	Milpitas
	Atriplex depressa	brittlescale	None	None	Milpitas
	Atriplex minuscula	lesser saltscale	None	None	Milpitas
	Extriplex joaquinana	San Joaquin spearscale	None	None	Milpitas
	Suaeda californica	California seablite	Endangered	None	Milpitas
	Eleocharis parvula	small spikerush	None	None	Milpitas
	Astragalus tener var. tener	alkali milk-vetch	None	None	Milpitas
	Trifolium hydrophilum	saline clover	None	None	Milpitas
	Malacothamnus hallii	Halls bush-mallow	None	None	Milpitas
	Chloropyron maritimum ssp. palustre	Point Reyes salty birds-beak	None	None	Milpitas
	Puccinellia simplex	California alkali grass	None	None	Milpitas
	Navarretia prostrata	prostrate vernal pool navarretia	None	None	Milpitas
	Chorizanthe robusta var. robusta	robust spineflower	Endangered	None	Milpitas

Source: California Department of Fish and Wildlife, BIO Geospatial Map-CNDDB Species for Milpitas Quadrant, https://apps.wildlife.ca.gov/bios/?tool=cnddbQuick, accessed December 12, 2023.

As shown in **Table 3.4-1**, there are several special-status wildlife and plant species that have the potential to occur within the same US quadrant as the Project Site. However, the Project Site is currently developed with an office building, paved surface parking, and minimal non-native vegetation. The Project Site is immediately adjacent to three roadways and a developed school. As such, there is limited potential for the critical habitat of the majority of the special status flora and fauna identified above.

As shown in **Table 3.4-1**, there are several migratory bird species and special-status bird species that could potentially occur within the Project Site that typically nest in tall trees. These species include the white-tailed kite (*Elanus leucurus*), bald eagle (*Haliaeetu sleucocephalus*), great egret (*Ardea alba*), black-crowned night heron (*Nycticorax nycticorax*), and double crested cormorant (*Nannopterum auritum*). The Project would operate as a school and is highly unlikely to disturb any potential nesting habitats on-site. However, construction activities associated with the Project would include removing 35 existing on-site trees. The Project would plant six new trees. As such, the Project could potentially disturb and modify critical habitats that may be present on-site for special-status bird species. **Mitigation Measure BIO-1** would require a pre-construction clearance survey to be conducted on-site with a qualified biologist prior to the initiation of construction activities associated with the Project. In the event that an active nest is discovered during the pre-construction clearance survey, **Mitigation Measure BIO-1** would require all construction activities associated with the Project to stay outside of a 100-foot buffer around the discovered nest. Implementation of **Mitigation Measure BIO-1** would ensure that the Project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species. As such, impacts to special-status migratory birds would be reduced to less than significant levels.

Mitigation Measures:

BIO-1 In the event that ground disturbing activities or removal of any trees, shrubs, or any other potential nesting habitat that are associated with the Project are scheduled to occur within the avian nesting season (from January 1 through August 31), a qualified biologist retained by the City shall conduct a pre-construction clearance survey for nesting birds within three days prior to any ground disturbing activities.

The biologist conducting the clearance survey shall document the negative results if no active bird nests are observed on the Project Site during the clearance survey with a brief letter report indicating that no impacts to active bird nests would occur before construction can proceed. If an active bird nest is discovered during the pre-construction clearance survey, construction activities shall stay outside of a 100-foot buffer around the active nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.

Any activities requiring the removal of a tree with an active bird nest shall halt until nesting activity seasons, which would be determined by the qualified biologist.

The biologist shall be present to delineate the boundaries of the buffer area and to monitor the active nest to ensure that nesting behavior is not adversely affected by the construction activity. Results of the pre-construction survey and any subsequent monitoring shall be provided to the City of Milpitas, California Department of Fish and Wildlife, and other appropriate agencies. This requirement shall be indicated on the site improvement plan and specifications for verification by the City of Milpitas prior to the initiation of construction activities.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The CDFW considers sensitive natural communities to have significant biotic value, with species of plants and animals unique to each community. The Project Site does not contain any riparian habitat and does not contain any streams or water courses necessary to support riparian habitat. As shown in Table **3.4-1**, the CNDBB search revealed that the Northern Coastal Salt Marsh is a sensitive natural community. There is no Northern Coastal Salt Marsh vegetation present on-site with the nearest being approximately three miles northeast of the Project Site in the San Francisco Bay.[11] Given this distance and the developed and urbanized nature of the Project Site and surrounding area, the Project would not result in any adverse effects on any identified riparian habitat or other sensitive natural community.

Mitigation Measures: No mitigation measures are required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. According to the USFWS National Wetlands Inventory Mapper, there are no mapped wetlands within the Project Site.[12] As such, no impacts would result pertaining to state or federally protected wetlands.

---

11 Yerba Buena Chapter-CNPS, "Northern Coastal Salt Marsh." Available online at: http://cnps-yerbabuena.org/northern-coastal-salt-marsh/. Accessed January 8, 2024.

12 United States Fish and Wildlife, "National Wetlands Inventory." Available online at: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed December 12, 2023.

Mitigation Measures: No mitigation measures are required.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact with Mitigation Incorporated. Due to the developed and urbanized nature of the Project Site and surrounding area, Project implementation would not interfere with the movement of any native resident, migratory fish or animal species. However, existing ornamental vegetation on-site has the potential to provide suitable nesting habitat for birds. The Migratory Bird Treaty Act (MBTA) governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, or nests. There are several mature trees present within the Project Site that may provide suitable habitat for nesting birds protected under the MBTA and California Fish and Game Code §§ 3500-5500. Birds may also nest on or within the vacant building on-site. As discussed above, construction activities associated with the Project would remove 35 trees on-site, thus removing potential habitat for birds. However, as stated above, the Project would implement **Mitigation Measure BIO-1**, which would ensure any potential direct and indirect impacts to protected nesting birds would be reduced to less than significant levels.

Mitigation Measures: See **Mitigation Measure BIO-1**.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant Impact. The City of Milpitas Municipal Code (Title X, Streets and Sidewalks Chapter 2.0, *Tree Maintenance and Protection*) prohibits the removal of any street tree, protected tree or heritage planting from the Public Right-of-Way or private properties without first applying for a permit issued by the City of Milpitas Public Works and/or Planning Department. Additionally, the City may seek additional cost recovery for the removal of any protected tree. According to Section X-2-7.01 (Existing Trees Protected) of the Municipal Code, existing trees that are protected include trees that have a circumference greater than 37 inches on vacant properties and "heritage trees". Section X-2-7.01 of the Municipal Code defines heritage trees as:

- An outstanding specimen or grove of a desirable species;
- One of the largest or oldest trees or grove of trees in Milpitas; and/or
- A tree or grove of trees possessing distinctive form, size, age, location and/or historical significance

As discussed, the Project would remove approximately 35 trees. However, the Project would preserve 56 on-site trees that are in fair to good health and plant six new trees on-site. According to the Project's preliminary landscape plan, there are no existing trees on-site with a trunk circumference greater than 37 inches. Prior to the issuance of grading permits, the Project would be required to submit the landscape plan outlining the species of each tree that would be removed to the City for review. In the event that a heritage or protected tree would be removed under the Project, the Project Applicant would be required to comply with Section X-2-4.02 (Permit Required for Removal) and apply for a tree removal permit with the City's Public Works Department. In accordance with the tree removal permit, the Project Applicant would be subject to fees associated with t the value of the removed tree as determined by an arborist certified by the International Society of Arboriculture or required to plant at least two trees for every one protected tree removed by permit. Adherence to the applicable regulatory requirements outlined in the City's Municipal Code would ensure that impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. Th City of Milpitas is partially located within the planning area of the adopted *Santa Clara Valley Habitat Plan* (SCVHP). However, the Project Site is located outside of the SCVHP planning area.[13] As such, the Project Site is not considered to be a Covered Activity under the SCVHP.[14] No other Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plans apply to the Project Site. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, and no impact would occur.

Mitigation Measures: No mitigation measures are required.

---

13 Santa Clara Valley Habitat Agency, *Final Santa Clara Valley Habitat Plan*, Figure 1-2, Santa Clara Valley Habitat Plan Study Area and Permit Area. August 2012. Available online at: https://www.scv-habitatagency.org/178/Santa-Clara-Valley-Habitat-Plan, accessed December 12, 2023.

14 A "Covered Activity" is a lawful action authorized by the Incidental Take Permit and is implemented by the Permittee(s) in accordance with a Habitat Conservation Plan.

5. Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

This section includes information provided in the Sacred Lands File (SLF) search report from the Native American Heritage Commission (NAHC) completed for this Project dated January 10, 2024. The results were negative. This report is incorporated herein by this reference and provided in **Appendix B, Cultural Resources Documentation,** to this Draft Initial Study.

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?

No Impact. A records request was sent to the Northwest Information Center (NWIC) on January 10, 2024, to inquire if any state or federally designated historical resources are identified either on-site or within the immediate vicinity of the Project Site (See **Appendix B** of this IS/MND). No responses from the NWIC have been received as of the publication of this MND**.** Typically, buildings that are recognized by the state as eligible resources are considered historic and are 50 years old or older. The Project Site currently includes an existing building that was constructed in 2002 and therefore was constructed 22 years ago. The existing building does not exhibit the historical architectural themes or styles that are commonly provided in other historically preserved buildings and communities throughout the state (e.g., buildings that have mid-century modern architectural style). Furthermore, the Office of Historic Preservation, the California Register of Historical Resources (CRHR), and the National Register of Historical Places (NRHP) do not identify any historical resources on-site.[15] As such, the Project would not cause a substantial adverse change in the significance of a historical resource pursuant to *CEQA Guidelines* Section 15064.5, and no impacts would occur.

---

15 Office of Historic Preservation, "Built Environment Resource Directory (BERD)." Available online: https://ohp.parks.ca.gov/?page_id=30338, accessed January 23, 2024.

Mitigation Measures: No mitigation measures are required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less than Significant Impact with Mitigation Incorporated. The Project Site is located in a developed and urban area that has been highly disturbed. Surfaces on-site are mostly paved with concrete. As such, it is unlikely that accidental discovery of archeological resources would occur. However, construction activities associated with the Project would involve grading. Thus, undiscovered archaeological resources could potentially be encountered during ground disturbing activities. In the event that previously unidentified archaeological resources are encountered, the Project would be required to comply with **Mitigation Measure CUL-1**. **Mitigation Measure CUL-1** would ensure that work in the immediate area of a potential archaeological find is halted until an archaeologist evaluates the find and determines appropriate subsequent procedures. With implementation of **Mitigation Measure CUL-1**, impacts would be less than significant.

Mitigation Measures:

CUL-1 If archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall be halted and an archaeologist meeting the Secretary of Interior's Professional Qualification Standards for archaeology in either prehistoric or historic archaeology shall be contacted immediately to evaluate the find. If the resources are Native American human remains, the County Coroner and the Native American Heritage Commission shall be contacted as mandated by law. If necessary, the evaluation may require preparation of archaeological testing for California Register of Historical Resources (CRHR) eligibility. Results of the archaeological testing shall be reviewed and approved by the qualified archaeologist. If the discovery proves to be significant under CEQA and cannot be avoided by the Project, additional work may be warranted, such as data recovery excavation, and, if so, shall be identified by the archaeologist to mitigate any such significant impacts to cultural resources, if identified.

c) Disturb any human remains, including those interred outside of formal cemeteries?

Less than Significant. As the Project Site has been subject to past subsurface disturbance associated with grading and foundations, it is not anticipated that intact human remains would be encountered during construction activities. However, in the event that human remains are encountered, those remains would require proper treatment, in accordance with the with State of California Health and Safety Code Section

7050.5. As required by State law, the requirements and procedures set forth in Section 5097.98 of the California Public Resources Code would also be implemented. Adherence to existing State laws would reduce impacts to any human remains, including those interred outside of formal cemeteries to less than significant levels.

Mitigation Measures: No mitigation measures are required.

6. Energy

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation?

Less than Significant Impact. Pacific Gas & Electric (PG&E) provides electrical service to the County of Santa Clara, including the City of Milpitas

Construction Energy Use

Construction activity would use energy in the form of petroleum-based fuels to power off-road construction vehicles and equipment, construction worker travel, and vehicles used to deliver materials to the Project Site. The Project would require site preparation and grading, including hauling material off-site; building construction; paving; and architectural coating.

During construction, electricity would be consumed on a limited basis to power lighting, electrical equipment, and supply and convey water for dust control. Electricity would be supplied to the Project Site from existing electrical lines that connect to the Project Site. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. Electricity use from construction would be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the Project's annual operational electricity.

Construction activities typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus, there would be no expected demand generated by construction of the Project. If natural gas is used during construction, it would be in limited amounts and on a temporary basis and would specifically be used to replace or offset diesel-fueled equipment and as such would not result in substantial on-going demand.

Construction of the Project would utilize fuel-efficient equipment consistent with State and federal regulations, such as fuel efficiency regulations in accordance with CARB standards and California Code of Regulations, Title 13, sections 2449(d)(3) and 2485, which minimizes the idling time of construction equipment either by shutting it off when not in use or by reducing the time of idling to no more than five minutes.

Construction equipment would be maintained to applicable standards, and construction activity and associated fuel consumption and energy use would be temporary and typical of construction sites. It is also reasonable to assume contractors would avoid wasteful, inefficient, and unnecessary fuel consumption during construction to reduce construction costs. Therefore, the Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Operation Energy Use

The Project would renovate the existing office building on-site into a new preparatory school. This new school would include a theater, bio/chem lab classrooms, kitchens, and electrical room. The Project would also include 16 bathrooms. Operations of the Project would consume energy for multiple purposes, including, but not limited to, use of electronics, lab equipment and appliances, HVAC equipment, and refrigeration. Energy would also be consumed during school operations related to water usage, solid waste disposal, and vehicle trips. The new gymnasium would consume energy through the use of electricity during practices, games, and other school uses.

The Project would be required to comply with the requirements outlined in the 2022 California Building Green Code (CALGreen Code), which would minimize the Project's energy demands. The Project would also be required to comply with Chapter 20 (Green Building Regulations) of the City's Municipal Code, which, in part, would aim to reduce building energy use. In addition, the Project would be supplied by PG&E, which in turn must comply with the Renewables Portfolio Standard (RPS) targets set by the State. PG&E has demonstrated that it has met these requirements previously, and it is reasonable to assume it will continue to do so and meet these targets. As such, electricity supplied to the Project Site would increasingly come from renewable sources throughout the life of the Project.

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Site. The majority of the vehicle fleet would consist of light-duty automobiles and light-duty trucks, which are subject to fuel efficiency standards, such as the Low Carbon Fuel Standard (LCFS) and Low-Emission Vehicle Program Standards. The Low Carbon Fuel Standard, in part, aims to reduce fuel consumption and providers of transportation fuels must demonstrate that the mix

of fuels they supply for use in California meets the LCFS carbon intensity standards for each annual compliance period.[16]

For these reasons, the Project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The Project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. The Project would comply with Title 24, CALGreen standards, and the City's Green Building Regulations would ensure the Project would incorporate energy efficient windows, insulation, lighting, ventilation systems, as well as water efficient fixtures, which is consistent with the state and City's goals for energy efficiency. As shown in **Figure 2.0-5**, **Conceptual Site Plan**, the Project would include four electric vehicle parking spaces at the northeastern parking lot area, in addition to the bicycle parking included as part of the proposed preparatory school. Per Chapter 20 of the City's Municipal Code, the Project would be LEED certified, which aims to increase energy efficiency. Adherence with state and local regulations and requirements would ensure that no impacts would occur.

16 California Air Resources Board, "Low Carbon Fuel Standard." Available online at: https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/about, accessed December 11, 2023.

7. Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the state geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

In 2015, the California Supreme Court, in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Ca 4th 369 (*CBIA v. BAAQMD*), held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. On the other hand, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project (as well as other impacted individuals). Thus, the analysis associated with existing geological hazards below focuses on whether the Project would exacerbate these environmental conditions and increase the potential to expose people to impacts.

Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the state geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact. The Alquist-Priolo Earthquake Fault Zoning Act was passed following the 1971 San Fernando earthquake. The Act regulates development in California near known active faults due to hazards associated with surface fault ruptures. Alquist-Priolo maps are distributed to affected cities, counties, and state agencies for their use in planning and controlling new construction. Areas within Alquist-Priolo Earthquake Fault Zones require special studies to evaluate the potential for surface rupture to ensure that no structures intended for human occupancy are constructed across an active fault.

According to the California Geological Survey (CGS), the Project Site is not located within an Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazard.[17] In addition, the nearest active fault is the

[17] California Department of Conservation, "Earthquake Zones of Required Investigation." Available online at: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed December 18, 2023.

Hayward Fault Zone, located approximately 1.6 miles east of the Project Site.[18] Considering the distance to the nearest known active faults, the potential for surface fault rupture due to a known active fault is considered low. As such, impacts pertaining to potential fault rupture of a known earthquake fault is not likely. Compliance with the mandatory building code structural specifications, as well as adherence to geotechnical recommendations, would result in structures that would adequately resist adverse effects from seismic ground shaking. Therefore, impacts associated with strong seismic ground shaking would be less than significant.

Mitigation Measures: No mitigation measures are required.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

ii) Strong seismic ground shaking?

Less than Significant Impact. As discussed above, the Project Site is located less than two miles from the southeast extension of the Hayward Fault, an earthquake fault line with an estimated magnitude (Mw) of 6.9 Mw. On a movement magnitude scale, seismic events with a magnitude between 6.1 to 6.9 Mw are classified as events that "may cause a lot of damage in very populated areas."[19] As such, the Project would be required to undergo a site plan review from the City's Building Safety and Housing Department to ensure that design plans for the Project would be developed in accordance with the seismic design requirements for building, as detailed in the 2022 California Building Code (CBC). Compliance with the 2022 CBC would ensure that the Project would not directly or indirectly cause potential substantial adverse effects involving strong seismic ground sharking, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a phenomenon in which loose, saturated, relatively cohesionless soil deposits lose shear strength during strong ground motions. Primary factors controlling

---

18 United States Geological Survey, "Quaternary Fault and Fold Database of the United States." Available online at: https://www.usgs.gov/programs/earthquake-hazards/faults. Accessed on December 13, 2023.

19 Michigan Tech University, "Earthquake Magnitude Scale," Available online at: https://www.mtu.edu/geo/community/seismology/learn/earthquake-measure/magnitude/, accessed on December 13, 2023.

liquefaction include intensity and duration of ground motion, gradation characteristics of the subsurface soils, in-situ stress conditions, and the depth to groundwater. According to the CGS, the Project Site is located within an area that is identified as a liquefaction hazard zone.[20]

As a new preparatory school, Project operations would not include any earth disturbing activities. As stated, the Project would be subject to site plan review and approval by the City's Building Safety and Housing Department to ensure that the proposed structures are seismically sound. Construction activities that involve earth disturbing activities would adhere to the best management practices (BMPs) and design standards outlined in the CGS's *Guidelines for Evaluating and Mitigating Seismic Hazards in California*. The Project would also comply with all applicable regulations and design standards in the 2022 CBC to ensure that liquefaction potential is minimized. Compliance with the 2022 CBC and the City's design standards and site plan review process would ensure that impacts involving ground failure involving liquefaction would be less than significant.

Mitigation Measures: No mitigation measures are required.

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

iv) Landslides?

No Impact. Landslides and other types of slope failures, such as lateral spreading, can result in areas with varying topography in the event of an earthquake. The Project Site is located within an area of the City with relatively flat topography. Additionally, the Project Site is not located within a designated landslide zone.[21] As such, landslide hazard is anticipated to be negligible, and impacts related to landslides would not occur.

Mitigation Measures: No mitigation measures are required.

b) Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Construction activities associated with the Project would result in ground surface disruption during site clearance and grading, which would temporarily expose soils, allowing for possible erosion. The Project would be required to comply with federal, regional, and local regulations pertaining to soil erosion related-construction activity. As discussed further in **Section 10**, **Hydrology and**

---

20 California State Geoportal, "Liquefaction Zones." Available online at: https://gis.data.ca.gov/datasets/b70a766a60ad4c0688babdd47497dbad/about?layer=0, accessed December 13, 2023.

21 California Department of Conservation, "Landslide Inventory (Beta)." Available online at: https://maps.conservation.ca.gov/cgs/lsi/, accessed December 13, 2023.

Water Quality, construction and operational activities associated with the Project would be subject to the applicable measures and requirements outline in Chapter 16 (Stormwater and Urban Runoff Pollution Control). By complying with local regional regulations, impacts related to soil erosion and loss of topsoil would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Less than Significant Impact. Lateral spreading is a phenomenon in which surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. The surficial blocks are transported downslope or in the direction of a free face, by earthquake and gravitational forces. The Project Site is relatively flat and does not include a free-facing slope in proximity to the site. Therefore, the potential for lateral spreading is considered very low.

Subsidence occurs when large amounts of groundwater have been withdrawn from certain types of rocks, such as fine-grained sediments. In California, large areas of land subsidence were first documented by USGS scientists in the first half of the 20th century. Most of this subsidence was a result of excessive groundwater pumping. The Project Site is located within an area that has been identified to potentially experience groundwater subsidence according to the USGS.[22] However, the Project would operate as a school and would not involve groundwater pumping from the Project area. Further, the Project would adhere to the requirements outlined in the 2022 CBC related to soil treatment and excavation during construction. Therefore, adherence to state regulations would reduce impacts related to subsidence hazards to less than significant levels.

The potential for liquefaction is anticipated at the Project Site and, therefore, the potential for liquefaction-related collapse is also possible. However, as stated above, the Project would comply with the grading and foundation recommendations presented in the CGS's *Guidelines for Evaluating and Mitigating Seismic Hazards in California*. The Project would also be designed and constructed to comply with the 2022 CBC. These design requirements would minimize the impacts from lateral spreading and liquefaction to less than significant levels. Adherence to the seismic design parameters of the 2022 CBC would be confirmed at plan check and building design review with the City of Milpitas. Therefore, Project impacts concerning lateral spreading and liquefaction would be less than significant.

22 U.S. Geological Survey, "Areas of Land Subsidence in California." Available online at: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html, accessed December 13, 2023.

d) Be located on expansive soil, as identified in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less than Significant Impact. Expansive soils are defined as soils possessing clay particles that react to moisture changes by shrinking (when dry) or swelling (when wet). According to the United States Department of Agriculture (USDA), soils within the Project Site are classified as "Urban land-Hangerone complex" and "Urban land-Clear Lake complex" which generally consist of medium dense to dense sands and gravels. These materials have a low potential for soil expansion.[23] As such, impacts from soil expansion would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. No septic tanks or alternative wastewater disposal systems would be constructed as part of the Project. Therefore, impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems would not occur.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact with Mitigation Incorporated. Paleontological resources include fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. Paleontological resources are generally found within sedimentary rock formations.

As discussed above, the Project Site is located within a developed and urban area that has been highly disturbed. Surfaces on-site are mostly paved with concrete and asphalt. However, ground disturbing activities during construction could potentially impact undiscovered paleontological resources, which could be considered a significant impact. **Mitigation Measure GEO-1** would require all construction activities to halt in the event that a paleontological resource is encountered and require a qualified paleontologist to assess the find and prepare a Paleontological Resource Mitigation Plan to address assessment and recovery of the resource. With the implementation of **Mitigation Measure GEO-1**, impacts related to the paleontological resources would be reduced to less than significant levels.

---

23 United States Department of Agriculture, "Web Soil Survey." Available online at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed December 13, 2023.

Mitigation Measures:

MM GEO-1 In the event that paleontological resources are discovered all construction activities shall halt within 50 feet of the discovery and a Paleontological Resource Mitigation Plan shall be prepared by a qualified paleontologist to address assessment and recovery of the resource. A final report documenting any found resources, their recovery, and disposition shall be prepared in consultation with the Project Applicant, and a copy of the report shall be provided to the City of Milpitas Planning Division.

8. Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☒	☐	☐

Global climate change refers to any significant change in climate measurements, such as temperature, precipitation, or wind lasting for an extended period. Climate change may result from natural factors, natural processes within the climate system, and human activities that change the atmospheric composition and land surface. The dangers of climate change include, but are not limited to, increased wildfire dangers from extended dry seasons, sea level rise from melting ice caps and thermal expansion, and storm surges driven by changing weather patterns.

The natural process through which heat is retained in the troposphere[24] is called the "greenhouse effect." Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases, play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere as short-wave radiation. It travels through the atmosphere without warming it and is absorbed by the Earth's surface. When the Earth re-emits this radiation back toward space, the radiation changes to long wave radiation. GHGs are transparent to incoming short-wave solar radiation but absorb outgoing long wave radiation. As a result, radiation that otherwise would escape back into space is now retained, warming the atmosphere. This phenomenon is known as the greenhouse effect.

Regulatory Framework

The State of California has implemented a series of GHG plans and policies aimed at reducing state GHG emissions. Measures applicable to the project are summarized below:

[24] The troposphere is the bottom layer of the atmosphere, which varies in height from the Earth's surface from 6 to 7 miles).

- Executive Order (EO) S-03-05. EO S-03-05 was issued by Governor Schwarzenegger to set statewide emissions reduction standards. The order required the state to reduce GHG emissions to 1990 levels by 2020 and reduce GHG emissions to 80% below 1990 by 2050.

- Assembly Bill (AB) 32. AB 32 was signed into law in 2006 and codified into law the 2020 GHG emissions target set by EO S-03-5.

- Senate Bill (SB) 32. SB 32 was signed into law in 2016 and sets into law the mandated reduction targets set in EO B-30-15, which required a reduction in GHG emissions to 40% below the 1990 levels by 2030.

- 2022 Final Scoping Plan. CARB issued the third, most comprehensive and far-reaching Scoping Plan developed to date. The 2022 Final Scoping Plan identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85% below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40% below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan

Local Regulations

Bay Area Air Quality Management District (BAAQMD)

For land use development projects, the BAAQMD recommends using the approach endorsed by the California Supreme Court in Center for Biological Diversity v. Department of Fish & Wildlife (2015) (62 Cal.4th 204), which evaluates a project based on its effect on California's efforts to meet the State's long term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less than significant impact on climate change under CEQA. If a project would contribute its "fair share" of what will be required to achieve those long-term climate goals, then a reviewing agency can find that the impact will not be significant because the project will help to solve the problem of global climate change (62 Cal.4th 220–223).

City of Milpitas Climate Action Plan

The City of Milpitas adopted a Climate Action Plan Update (CAP Update) in 2022 to make Milpitas a more sustainable community by reducing GHG emissions and to establish a "qualified greenhouse gas reduction strategy." The CAP Update is designed to be a comprehensive roadmap to continue addressing the challenges of climate change and keep the City on its path to carbon neutrality by 2045. The CAP Update is the product of extensive and ongoing engagement with residents, businesses, local government, and other organizations and stakeholders. These extensive community engagement efforts have resulted in

locally based and context-specific strategies, measures, and actions designed to achieve the City's climate objectives while simultaneously enhancing the quality of life for Milpitas's residents, workers, and visitors.

The CAP Update also identifies nine "co-benefits" that would result from the implementation of the CAP Update. These co-benefits are considered as additional valuable outcomes that are not the primary intent of climate change mitigation or adaptation actions, such as improvements to local air quality and water supply, increases in local green jobs and cost savings, and benefits to public health and improved mobility options. The CAP Update incorporates best practices to produce a blueprint for achieving GHG emissions reduction in Milpitas and ultimately, to comply with AB 32, SB 32, AB 1279 and SB 375.

Milpitas's CAP Update meets the standards of a Qualified GHG Reduction Plan (which parallel and elaborate upon criteria established in *State CEQA Guidelines* Section 15183.5(b)(1)), as presented in the chapters referenced below.[25]

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area (Chapter 2).
- Establish a level, based on substantial evidence, below which the contribution of GHG emissions from activities covered by the plan would not be cumulatively considerable (Chapter 2).
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area (Chapter 3).
- Specify measures or a group of measures, including performance standards that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level (Chapter 4).
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specific levels (Chapter 6).
- Adopt the GHG Reduction Strategy in a public process following environmental review.

The City also published an Addendum to the *City of Milpitas General Plan Final EIR* for the CAP Update in June 2022. The Addendum includes an attachment with an environmental checklist that serves as the appropriate CEQA compliance document and has been prepared in compliance with the requirements of Section 15162 of the *State CEQA Guidelines*. The checklist contains substantial evidence to support that the

25 City of Milpitas, *Climate Action Plan Update*, 2022. Available online at: https://www.milpitas.gov/DocumentCenter/View/891/Addendum-to-the-Milpitas-General-Plan-EIR-for-the-Milpitas-Climate-Action-Plan-Update-PDF. Accessed November 30, 2023.

CAP update would not result in any new or substantially more severe environmental impacts from those identified in the *City of Milpitas General Plan EIR*.

City of Milpitas Green Building Regulations

The City of Milpitas Municipal Code (MMC) includes Chapter 20, Green Building Regulations which regulates the design, construction, maintenance, operation, and deconstruction of buildings by incorporating green building practices into all development. The building provisions are designed to achieve the following goals:

1. Increase energy efficiency;
2. Encourage water and resource conservation;
3. Reduce waste generated by construction projects; and
4. Promote the health of residents, workers, and visitors to the City.[26]

BAAQMD Thresholds

The BAAQMD does not provide an adopted threshold of significance for construction related GHG emissions. The *BAAQMD 2022 CEQA Guidelines*[27] states that GHG emissions from construction represent a very small portion of a project's lifetime GHG emissions. Therefore, the thresholds for land use projects are designed to address operational GHG emissions, which represent the project's GHG emissions.

According to the *BAAQMD 2022 CEQA Guidelines*, a proposed land use development project would not have a significant GHG impact if operation of the Project would meet one of the following thresholds (must include **A** or **B)**:

---

26 City of Milpitas, Milpitas Municipal Code, Chapter 20 – Green Building Regulations, Available online at: https://library.municode.com/ca/milpitas/codes/code_of_ordinances?nodeId=TITIIBURE_CH20GRBURE. Accessed November 30, 2023.

27 Bay Area Air Quality Management District, *2022 CEQA Guidelines.* Available online at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines, Accessed November 30, 2023.

Threshold A: Projects must include, at a minimum, the following project design elements:

- Buildings:
  - The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
  - The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the *State CEQA Guidelines.*
- Transportation:
  - Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15%) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
    - Residential projects: 15% below the existing VMT per capita
    - Office projects: 15% below the existing VMT per employee
    - Retail projects: no net increase in existing VMT
  - Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

Threshold B: Projects must be consistent with a local GHG reduction strategy that meets the criteria under *State CEQA Guidelines* Section 15183.5(b).

Methodology

GHG emissions for the Project were analyzed using the methodology recommended in the *BAAQMD 2022 CEQA Guidelines*. As stated under the thresholds of significance heading above, the BAAQMD recommends the operation of all land use projects meet either BAAQMD Thresholds "**A**" or "**B**." As discussed earlier, the City's CAP qualifies as a "greenhouse gas emissions reduction plan" pursuant to Section 15183(b)(1) of the *State CEQA Guidelines*. Therefore, impact questions "a" and "b" have been analyzed together within the scope of BAQMD Threshold "**B**."

GHG emissions were calculated with the CalEEMod. Operational GHG emissions result from both direct and indirect sources. Direct emissions include emissions from fuel combustion in vehicles and natural gas combustion from stationary sources. Indirect sources include off-site emissions occurring as a result of electricity and water consumption and solid waste.

Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact with Mitigation Incorporated. Using CalEEMod, project GHG emissions throughout the construction phases were calculated from off-road equipment usage, hauling vehicles, delivery, and worker vehicle trips to and from the site. The total GHG construction emissions over the approximately 12-month construction duration of the Project would be approximately 178.8 MT CO2e. As GHG emissions impact from construction activities would occur over a relatively short time span, it would contribute a relatively small portion of the lifetime GHG emission impact of the Project. The total construction GHG emissions were divided by 30 to determine an annual construction emission rate estimate to be amortized over the Project's first 30 years of operational life, consistent with CEQA analysis across the state. Amortized over a 30-year period, the Project is anticipated to emit approximately 5.96 MT CO2e/year.

CalEEMod was also used to calculate the annual GHG emissions generated by the Project during operation. Sources of GHG emissions during operation include emissions from area sources, electricity, mobile sources, waste, and water. Amortized yearly construction emissions were added to operational GHG emissions to calculate the Project's total annual GHG emissions.

Emissions from area sources are based on land use sizes, GHG emission factors for fuel combustion, and the global warming potential (GWP) values for the GHGs emitted. Electricity usage emissions are based on the land uses, default demand factors for the land use, GHG emission factors for the utility provider, and the GWP values of the GHGs emitted. Mobile-source GHG emissions were determined by the Project's transportation engineer.[28] Waste and water emissions are derived from the anticipated water usage and wastewater generated based on the Project's proposed land uses and the associated water demand factors.

---

28 Hexagon Transportation Consultants, Inc., *1323 Great Mall Drive Stratford School, Traffic Operations Analysis,* January 8, 2024. Report available on file with the City Planning Department.

As shown in **Table 3.8-1, Project Greenhouse Gas Emissions**, the Project's estimated GHG operational emissions would be 1,895 MT CO2e/year. This quantification has been included for illustrative purposes and to satisfy the requirements of CEQA. The determination of significance for the Project is discussed below.

Table 3.8-1
Project Greenhouse Gas Emissions

Emissions Source	Metric Tons of Carbon Dioxide Equivalent (per year)
Mobile Sources	1,680
Area Sources	0.88
Energy Sources	160.70
Water Sources	5.25
Waste Sources	42.50
Refrigerants	0.04
Amortized Construction	5.96
Total GHG Emissions	**1,895**

*Source: Impact Sciences, Inc. See **Appendix A** for CalEEMod data.*
Area, energy, water, and waste emissions for the existing building and the new gymnasium were calculated together.

BAAQMD Threshold "B" states that projects must be consistent with a local GHG reduction strategy that meets the criteria under *State CEQA Guidelines* Section 15183.5(b). The City of Milpitas Climate Action Plan Update (CAP Update) satisfies Section 15183.5(b) of the *State CEQA Guidelines* and is therefore the appropriate local GHG reduction plan that the Project can be compared to for consistency. **Table 3.8-2, Project Consistency with Milpitas 2022 CAP Update**, shows the Project's consistency with the strategies and measures of the Milpitas CAP.

Table 3.8-2
Project Consistency with Milpitas 2022 CAP Update

Strategies and Actions	Consistency Analysis
Strategy BE-1: Shift to Clean and Reliable Energy	
Measure BE-1.1: Achieve 100 percent carbon-free electricity by 2030 in all existing and new developments.	**Consistent. Mitigation Measure GHG-1** would require new development associated with the Project to install on-site renewable energy storage systems, such as solar panels.

Strategies and Actions	Consistency Analysis
Measure BE-1.2: Facilitate innovative approaches to energy generation, distribution, and storage (e.g., microgrids).	**Not Applicable.** This measure requires the City to consider opportunities for alternative energy generation, and to collaborate with local electricity agencies to implement said opportunities. The Project would not interfere with any strategies or measures by the City to identify and adopt alternative methods of energy generation.
Measure BE-1.3: Strengthen community awareness of energy efficiency, energy conservation, electrification, and clean energy.	**Not Applicable.** This measure directs the City to implement comprehensive energy efficiency, energy conservation, electrification, and clean energy outreach and education campaigns. The Project would not conflict with this campaign.
Strategy BE-2: Maximize Building Decarbonization and Efficiency	
Measure BE-2.1: Adopt updated "reach" building codes with each building and energy code cycle to accelerate all-electric new development.	**Not Applicable.** This measure directs the City to update the reach code that prohibits the installation of natural gas infrastructure, as well as coordinate with other cities and electric/natural gas companies to implement mor efficient strategies. The Project would not interfere with any strategies or measures by the City to update energy efficient electricity Citywide.
Measure BE-2.2: Facilitate all-electric development projects for industrial buildings.	**Not Applicable.** This measure calls for the market demand for all-electric industrial buildings to be met. The Project would not introduce new industrial buildings to the Project Area.
Measure BE-2.3: Expand the City's Green Building Program.	**Not Applicable.** This measure requires the City to develop and implement incentives for projects that incorporate sustainable design approaches and/or elements that exceed local, regional, and State requirements. The Project would not interfere or conflict with these incentives.
Measure BE-2.4: Retrofit existing residential and nonresidential buildings and municipal facilities to improve energy efficiency and facilitate fuel switching.	**Not Applicable.** This measure is aimed at improving the energy efficiency of existing residential and nonresidential buildings and municipal facilities and does not involve any actions towards new development. The Project would not conflict with this measure.
Measure BE-2.5: Facilitate energy audits for existing buildings to identify energy efficiency retrofit and electrification opportunities.	**Not Applicable.** This measure is aimed at improving existing buildings and does not involve any actions towards new development. The Project would not conflict with this measure.
Measure BE-2.6: Reduce plug loads in existing buildings.	**Not Applicable.** This measure is aimed at improving existing buildings and does not involve any actions towards new development. The Project would not conflict with this measure.
Strategy TR-1 Facilitate Sustainable Transportation and Land Use Planning	
Measure TR-1.1: Reduce VMT from new development in compliance with SB 743.	**Consistent:** As concluded in **Section 3.14, Transportation**, the Project would reduce VMT generated from the Project Site from 2,635 VMT/employee to 1,163 VMT/employee. The Project would not conflict with SB 743.
Measure TR-1.2: Reduce VMT from existing development.	**Consistent.** The Project would renovate an existing office building into a new preparatory school. As concluded in **Section 3.14, Transportation**, the Project would reduce VMT generated from the Project Site from 2,635 VMT/employee to 1,163 VMT/employee. The Project would not conflict with this measure.
Measure TR-1.3: Continue to implement and adopt policies that support high-density, mixed use, and transit-oriented development and housing near jobs.	**Consistent.** While this measure directs the City to implement and adopt policies that promote the use of transit-oriented development in more areas of the City, the Project Site supports this measure because it is located within a transit-oriented development area.
Measure TR-1.4: Explore car-free zones or shared streets in appropriate areas.	**Not Applicable.** This measure focuses on implementing car-free zones in areas with multiple commercial developments. The Project would not conflict with the City's efforts to implement car-free zones.

Strategies and Actions	Consistency Analysis
Strategy TR-2 Decarbonize Vehicles	
Measure TR-2.1: Increase EV charging infrastructure.	**Consistent:** With implementation of **Mitigation Measure GHG-1**, the Project would install four electric vehicle charging stations on-site.
Measure TR-2.2: Increase EV and low-carbon vehicle adoption.	**Not Applicable:** This measure directs the City to collaborate with local and regional agencies and implement incentives to increase the number of EV and low-carbon vehicles within the City. The Project would not conflict with these efforts.
Measure TR-2.3: Reduce vehicle idling.	**Not Applicable:** This measure directs the City to take actions to reduce vehicle idling. The Project would not interfere with such efforts.
Measure TR-2.4: Reduce the amount of parking such that it meets the needs of residents, workers, and visitors in a way that is consistent with the City's sustainability goals.	**Not Applicable.** This measure is directed at the City to lower the number of parking spaces within the City to meet the needs of the City population, while maintaining consistency with the City's sustainability goals. The Project would not interfere with such efforts.
Strategy TR-3 Increase Active and Public Transportation Use	
Measure TR-3.1: Enhance and expand transit facilities and infrastructure.	**Not Applicable**. This measure aims to improve and expand the City's existing transit facilities. The Project would not interfere with such efforts.
Measure TR-3.2: Increase transit ridership.	**Not Applicable.** This measure aims to increase the number of transit rides and riders within the City. The Project would not interfere with such efforts.
Measure TR-3.3: Improve active transportation options.	**Consistent.** The Project Site is located within the Milpitas Metro Specific Plan; according to the MMSP, the purpose of the Great Mall District sub-area is to maintain the original Great Mall, while developing residential infill, urban scaled buildings along Great Mall Parkway, commercial buildings located close to the Milpitas Transit Center, a central public gathering place and linear park, and a walkable street grid. The Project helps achieve the vision of the Specific Plan through the introduction of new EV charging stations and new bike racks for students and faculty and is 0.20 miles northwest of the Milpitas Transit Center.
Strategy SW-1 Achieve Zero Waste	
Measure SW-1.1: Eliminate the disposal of organic solid waste in landfills.	**Consistent:** The Project would adhere to the regulatory requirements of AB 341, SB1383 AB 1826, and the City's Municipal Code that pertain to organic solid waste disposal.
Measure SW-1.2: Increase recycling and the diversion of other inorganic solid waste.	**Consistent:** The Project would adhere to the recycling standards set forth in Chapter 200 (Solid Waste) of the City's Municipal Code and the CALGreen Code.
Measure SW-1.3: Reduce the generation of waste from residents and businesses.	**Consistent.** The Project would comply with state and local laws and regulations (i.e., CALGreen Code, AB 341, SB1383, AB 1826, and in Chapter 200 of the City's Municipal Code) that govern the generation and disposal of waste in residential developments.
Measure SW-1.4: Reduce the generation of construction and demolition waste.	**Consistent.** All construction activities associated with the Project would be required to demonstrate compliance with the applicable state and local laws and regulations (i.e., AB 939 and Chapter 200 of the City's Municipal Code) that requires all generated construction-related waste to be reduced, recycled, and re-used. The Project will be recycling 153.45 of the 221.5 tons of demolition debris.
Measure SW-1.5: Facilitate repair and reuse of consumer products.	**Not Applicable.** This measure directs the City to create reuse facilities. The Project would not interfere with such efforts.

Strategies and Actions	Consistency Analysis
Strategy OT-1 Shift to Clean Off-Road Equipment and Vehicles	
Measure OT-1.1: Reduce landscaping-related emissions.	**Consistent.** The Project would utilize energy efficient equipment to maintain the proposed open space and landscaping on-site.
Measure OT-1.2: Reduce construction-related emissions.	**Consistent.** As discussed above, construction activities associated with the Project would generate approximately 178.8 MT CO_{2e}. However, emissions would be temporary in nature and would represent a small portion of a Project's lifetime GHG emissions. Further, implementation **Mitigation Measure GHG-1** would require the Project to implement practices that would reduce emissions, such as utilizing energy-efficient construction equipment.
Strategy WA-1 Promote Resilient Water Supply, Water Use, and Water Resources	
Measure WA-1.1: Reduce indoor water consumption in buildings**.**	**Not Applicable.** This measure directs the City to implement water conserving programs and policies. The Project would not conflict with these policies.
Measure WA-1.2: Reduce water consumption for irrigation and landscaping.	**Consistent.** With implementation of **Mitigation Measure GHG-1**, the Project would include water-efficient irrigation systems capable of using reclaimed water.
Measure WA-1.3: Increase the use of recycled water and support efforts to drought-proof our water supply.	**Consistent.** The Project would utilize reclaimed water on-site, where feasible.
Strategy CS-1 Resilient Infrastructure and Healthy Forest and Natural Systems	
Measure CS-1.1: Protect native trees and vegetation and enhance carbon sequestration.	**Consistent.** Presently, the Project Site contains ornamental landscaping in the form of grass medians and approximately 93 trees are present on-site. The Project would remove 35 existing on-site trees, preserve 58 existing trees, and plant 6 new trees. Additionally, the Project will plant new shrubs, perennials, and groundcovers throughout the Project Site.
Measure CS-1.2: Reduce the urban heat island effect to conserve energy.	**Consistent.** As previously stated, the Project would retain multiple existing trees and incorporate new shrubs, perennials, and groundcovers throughout the Project Site, reducing the urban heat island effect.
Measure CS-1.3: Increase the use of green infrastructure.	**Consistent.** The Project would implement all sustainable building materials as recommended by the CALGreen Code to the proposed Project.
Measure CS-1.4: Increase soil carbon content.	**Not Applicable.** This measure requires the City to develop a soil strategy for the city to support urban agriculture, address carbon sequestration, and increase water capture. The Project would not conflict with these efforts.
Measure CS-1.5: Use low-carbon and carbon sequestering construction materials in new development.	**Not Applicable.** This measure implements plazas to include pervious pavement material, and new nonresidential developments to utilize building materials that store carbon.
Strategy GE-1 Foster Green and Sustainable Economic Development Opportunities	
Measure GE-1.1: Support and attract clean technology businesses and green jobs in Milpitas.	**Not Applicable.** This measure directs the City to collaborate with local and regional agencies to provide outreach programs, training, and educational courses pertaining to energy efficiency. This measure also requires the City to develop a Green Business Strategic Plan. The Project would not conflict with these efforts.
Measure GE-1.2: Incentivize and promote green business practices.	**Not Applicable.** This measure requires the City to promote certain "green" business practices: such as promoting green tenant and leasing practices for commercial businesses and to develop a "Clean Energy Pledge for commercial businesses. The Project would not conflict with these efforts.

Strategies and Actions	Consistency Analysis
Strategy GE-2 Support Circular Economy Policies	
Measure GE-2.1: Engage with circular economy and zero waste policymaking at the Federal, State, and local levels.	**Not Applicable.** This measure would encourage the City to implement best management practices that would reduce the City's waste generation. The Project would not conflict with these efforts.

Source:
City of Milpitas. Climate Action Plan Update. 2022. Available online at: https://www.milpitas.gov/DocumentCenter/View/899/Milpitas-Climate-Action-Plan-PDF?bidId=, accessed January 24, 2024.

The Project would not generate greenhouse gas emissions that would result in a significant impact on the environment, nor would it conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of GHGs. Further, as noted in **Mitigation Measure GHG-1** the Project is required to demonstrate compliance with the *Milpitas 2022 CAP Update.* Therefore, impacts are less than significant with mitigation incorporated.

Mitigation Measures: Implementation of **Mitigation Measure GHG-1** would demonstrate the Project's compliance with applicable goals and measures set forth in the *Milpitas 2022 CAP Update*. As such, the Project would comply with BAAQMD threshold "B" which states that projects must be consistent with a local GHG reduction strategy.

MM GHG-1 Prior to the issuance of a building permit, the Project Applicant shall demonstrate compliance with relevant and applicable measures of the CAP Update by preparing and implementing a project-specific consistency review checklist. The City shall review this consistency review checklist as part of the Project plan review.

The consistency review checklist shall outline feasible, effective and applicable measures that will be required for the Project. Applicable and effective measures in reducing Project GHG emissions include, but are not limited to, the following:

- Utilize the latest energy-efficient construction equipment, when feasible;
- Install Energy Star appliances;
- Install on-site renewable energy, such as solar panels;
- Provide on-site electric vehicle charging stations and associated infrastructure; and
- Install water-efficient irrigation systems capable of using reclaimed water, when available.

9. Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the Project's exacerbation of existing environmental conditions?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

As noted above, the California Supreme Court, in *CBIA v. BAAQMD*, held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. On the other hand, if a project exacerbates a condition in the existing environment, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project (as well as other impacted individuals). Thus, the analysis associated with existing hazardous

conditions below focuses on whether the proposed project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts.

Would the project:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact. Exposure of the public or the environment to hazardous materials could potentially occur through improper handling or use of hazardous materials or hazardous wastes during routine use, disposal, and/or transport of hazardous materials. The severity of these potential effects varies with the activity conducted, the concentration and type of hazardous materials or wastes present, and the proximity of sensitive receptors.

Operating as a school, the Project would not involve the handling, use or transport of substantial amounts of hazardous materials or hazardous wastes. However, construction activities associated with the Project would involve the use of those hazardous materials that are typically necessary for construction and renovations (i.e., paints, solvents, building materials, cleaners, and fuel for construction equipment). Accordingly, limited amounts of some hazardous materials could be used in the short-term construction phase of the Project and could expose construction workers and the general public to standard construction materials (e.g., paints and solvents), vehicle fuel, and other hazardous materials. In the event of a release of hazardous material the Project Applicant would be required to notify the following State agencies under the following State statutes, respectively:

- Department of the California Highway Patrol: California Vehicle Code Section 23112.5;
- Office of Emergency Services and the California Public Utilities Commission: Public Utilities Code Section 7673, (PUC General Orders #22-B, 161);
- State Fire Marshal: Government Code Sections 51018
- Office Emergency Services: Water Codes Sections 13271, 13272; and
- Division of Occupational Safety and Health (Cal/OSHA): California Labor Code Section 6409.1 (b)10.

Compliance with applicable state regulations would reduce impacts related to the routine transport, use or disposal of hazardous materials to less than significant levels.

Mitigation Measures: No mitigation measures are required.

b) Create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact. Project operations would not contribute to conditions that could cause a reasonably foreseeable release in hazardous materials. Construction equipment utilized during construction activities associated with the Project could result in accidental release of hazardous substances such as petroleum-based fuels or hydraulic fluid used for construction equipment. However, the level of risk associated with this type of accidental release of hazardous substances is not considered significant due to the small volume and low concentration of hazardous materials utilized during construction.

According to the State Water Resources Control Board (SWRCB) and the Department of Toxic Substances Control (DTSC), there are no reported cases of soil, soil vapor, or groundwater contamination on-site.[29,30] Furthermore, the potential of exposure to asbestos containing materials (ACMs) and lead based paint (LBP) is low, as the existing building on-site was constructed in 2002. As such, the Project would not create a significant hazard to the public or the environment through an accidental release of hazardous materials, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. The adjacent Stratford Preparatory School is located immediately south of the Project Site and is less than a one-quarter mile from the Project Site.

As previously discussed, construction of the Project would involve the use of hazardous materials that are typically necessary for construction and renovations. However, the transport, use, and disposal of construction-related hazardous materials would be temporary and would adhere to all applicable state federal regulations governing such activities.

As a new preparatory school, hazardous materials on-site would be limited to the nominal use of solvents (i.e., bleach and other cleaning materials) used for janitorial purposes, materials used for landscaping, and materials used for maintenance. However, these uses would be nominal and would be contained, stored,

---

29 State Water Resources Control Board, "Geotracker." Available online at: https://geotracker.waterboards.ca.gov/. Accessed December 13, 2023.

30 Department of Toxic Substances Control. "Envirostor." Available online at: https://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST. Accessed December 13, 2023.

and used in accordance with the manufacturers' instructions and handled in compliance with applicable standards and regulations. As such, impacts related to the emission of hazardous materials within one-quarter mile of a school would be less than significant.

Mitigation Measures: No mitigation measures are required.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Government Code §65962.5 requires DTSC, State Department of Health Services, SWRCB, and California Integrated Waste Management Board to compile and annually update lists of hazardous waste sites and land designated as hazardous waste property throughout the state. The Project Site is not listed pursuant to Government Code §65962.5.[31] As such, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The closest airport to the Project Site is Norman Y. Mineta San Jose International Airport, located approximately 4.5 miles southwest. The Project Site is located outside of the Airport Influence Area of the *Norman Y. Mineta San Jose International Airport Comprehensive Land Use Plan*.[32] Therefore, the Project would not expose students, faculty, and visitors to excessive airport-related noise levels, and no impacts would occur.

Mitigation Measures: No mitigation measures are required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Construction activities would be limited to the Project's boundaries, and all

---

31 California Environmental Protection Agency, "Cortese List Data Resources." Available online at: https://calepa.ca.gov/sitecleanup/corteselist/, accessed January 2, 2024.

32 Walter B. Windus PE, Aviation Consultant, *Norman Y. Mineta San Jose International Airport Comprehensive Land Use Plan, Figure 8 "Airport Influence Area, November 16, 2016.*

staging for construction would occur on-site. The existing driveways along Great Mall Drive and Falcon Drive would be used as emergency and evacuation access points. As such, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact. Wildfire hazard areas are commonly identified in regions of the wildland/urban interface. However, the Project Site is located in an entirely built-out urban community that is characterized by a mix of commercial and industrial areas. The Project Site does not interface with any wildlands, or an area classified as a Fire Hazard zone as identified by the California Department of Forestry and Fire Protection (CAL FIRE).[33] Therefore, impacts related to exposure of people to wildland fires would not occur. As such, the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. No impact would occur.

Mitigation Measures: No mitigation measures are required.

[33] California Department of Forestry and Fire Prevention (CAL FIRE), "Fire Hazard Severity Zone Viewer." Available online at: https://egis.fire.ca.gov/FHSZ/, accessed January 2, 2024.

10. Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: (i) result in substantial erosion or siltation on- or off-site?				
i. result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☒	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation??	☐	☐	☒	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact. Section 402 of the Clean Water Act (CWA) includes regulations established by the U.S. EPA under the National Pollutant Discharge Elimination System (NPDES) program to control direct stormwater discharges. In the State of California, the State Resources Water Control Board (SWRCB) administers the NPDES permitting program and is responsible for developing NPDES permitting

requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the Regional Water Quality Control Boards (RWQCB) to preserve, protect, enhance, and restore water quality. The City of Milpitas is located within the jurisdiction of the San Francisco Regional Water Quality Control Board (SFRWQCB).

Construction activities associated with the Project would involve grading activities to construct the proposed gymnasium building and playfield. As a result, waste discharge would occur and may consist of oil and grease, trash, heavy metals and pathogens as well as other pollutants. Further, construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. The ground disturbing activities associated with construction of the Project (new gymnasium and playfield) would be limited to the western portion of the Project Site that makes up less than one acre of the overall Project Site. Therefore, the Project would not be required to obtain coverage under the NPDES Construction General Permit.

The Project would be required to comply with Chapter 16 (Stormwater Management and Urban Pollution Control) of the City's Municipal Code. Specifically, the Project must adhere to Section XI-16-6 (Industrial and Commercial Site Controls), which requires Low Impact Development (LID) source control, site design, and stormwater treatment measures to ensure that stormwater runoff from the Project Site is reduced during construction and operational activities. As stated in Section XI-16-6, all plan documents and construction activities are subject to inspection and approval by the City. Additionally, the Project would comply with stormwater treatment requirements for redevelopment and new development outlined in Section XI-16-7 (Inspection and Maintenance of Permanent Stormwater Treatment Measures) by implementing a new stormwater treatment system for the Project. Under this system, the Project would install new concrete ditch lines that would drain stormwater runoff to new drainage inlets, in which new 6-inch and 8-inch underground storm drains lines collect water and then route to a detention basin which will then drain into a private storm drain system along Great Mall Drive. Stormwater runoff would flow to the modified biofiltration planter area located in front of the proposed school building. This planter area would act as a bioswale that would minimize the amount of stormwater runoff by filtering, temporarily storing and minimizing the amount water runoff using soils and vegetation. Adherence to the City's regulations for stormwater runoff treatment during construction, as well as the implementation of the new stormwater treatment system in accordance with the City would reduce potential impacts related to stormwater quality. Therefore, the Project would not violate any water quality or waste discharge requirements, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the Project may impede sustainable groundwater management of the basin?

No Impact. The Project would result in comparable impervious surfaces as the existing conditions. The Project would not install any new groundwater wells and would not otherwise directly withdraw any groundwater. The Project Site is currently developed and is not currently, nor is it planned to be used for groundwater recharge activities. Thus, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, and no impacts would occur.

Mitigation Measures: No mitigation measures are required.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

(i) Result in substantial erosion or siltation on- or off-site;

Less than Significant Impact. The Project would include grading activities associated with the Project that could adversely affect water quality due to erosion resulting from exposed soils and the generation of water pollutants, including trash, construction materials, and equipment fluids.

As stated, the Project would install new underground storm drain lines that would capture stormwater runoff from the proposed gymnasium through drain inlets. The proposed biofiltration planter area would collect runoff from these underground drains and for treatment prior to draining the City's existing stormwater drainage system off-site. Thus, the proposed on-site storm drain systems would reduce the amount of erosion and siltation from the Project Site. Further, the Project would adhere to the applicable requirements that are outlined in Chapter 16 of the City's Municipal Code related to runoff treatment during Project construction and operation. The implementation of the proposed on-site stormwater treatment system and adherence to existing local regulations would ensure impacts are less than significant.

Mitigation Measures: No mitigation measures are required.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less than Significant Impact. According to the Federal Emergency Management Agency's (FEMA's) Flood Map Service Center, the Project Site is located within a 100-year FEMA Flood Hazard Zone.[34] However, the Project would implement the applicable provisions for flood hazard reduction per Section XI-15, Chapter 15 (Floodplain Management Regulations) of the City's Municipal Code. Specifically, the Project would comply with Section XI-15-5.1 (Standards of Construction) of the Municipal Code and ensure that all construction materials and equipment are flood resistant so that there are adequate drainage paths around structures to guide flood waters around and away from proposed structures. Project plans would be submitted to the City to ensure the proposed buildings would not contribute to substantive runoff during a flooding event. Further, the proposed on-site storm drain system described above would minimize the amount of surface runoff on-site. As such, potential impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less than Significant Impact. Implementation of the Project would not increase the size of the existing building on-site. Thus, the amount of stormwater runoff from the existing building is not expected to increase during Project operations when compared to existing conditions. The proposed permeable turf playfield is not expected to increase in stormwater runoff, as soil erosion would not occur, and rainfall would permeate on the playfield. However, implementation of the new gymnasium building could contribute to additional stormwater runoff. As stated, the proposed on-site stormwater drainage system would minimize the additional runoff from the Project by collecting and filtering stormwater runoff using bioswale filtration. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

---

34 Federal Emergency Management Agency, "Flood Map Service Center- National Flood Hazard Layer FIRMette." Available online at: https://msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/mscprintb_gpserver/j3cc6c97f749e4c8d8fab0cff536ae375/scratch/FIRMETTE_938d2d6a-be69-4901-953f-24b964930a42.pdf, accessed January 5, 2024.

iv) Impede or redirect flood flows?

Less than Significant Impact. As stated above, the Project is located within a 100-year FEMA Flood Hazard Zone. However, the proposed on-site storm system would minimize stormwater runoff. Additionally, the Project would adhere to the applicable local regulations that would minimize drainage impacts, as well as the City's floodplain management requirements. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to Project inundation?

Less than Significant Impact. The Project Site is located approximately 35.27 miles east of the Pacific Ocean, and, according to the California Department of Conservation, is located at a sufficient distance so as not to be subject to potential tsunami hazards.[35] Therefore, there would be no impacts related to risk of release of pollutants due to inundation from a tsunami or seiche.

As stated above, the Project Site is located within a 100-year FEMA Flood Hazard Zone. The Project would comply with the requirements specified in Chapter 15 (Floodplain Management Regulations) of the Milpitas Municipal Code. Adherence with applicable regulations relating to floodplain management, as well as the applicable local, regional, state and federal regulations would reduce potential impacts to a less than significant level.

Mitigation Measures: No mitigation measures are required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. As stated, the Project would not result in substantial additional groundwater recharge, nor would the Project install any new groundwater wells and would not otherwise directly withdraw any groundwater. The Project may result in an increase in stormwater runoff on-site. Accordingly, the Project would adhere to all applicable local, state, and federal rules and regulations regarding water quality. Adherence to these regulations, as well as the proposed on-site stormwater drainage system, would minimize the Project's effects on the City's overall water quality. As such, impacts to a water quality control plan or sustainable groundwater management plan would be less than significant.

---

35 California Department of Conservation, "Los Angeles County Tsunami Hazard Areas." Available online at: https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles. Accessed January 2, 2024.

Mitigation Measures: No mitigation measures are required.

11. Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Would the project:

a) Physically divide an established community?

No Impact. The Project would renovate an existing office building into a preparatory school and construct an associated gymnasium and playfield. The Project would serve the community overall by providing a new school for students in grades 6th to 12th to attend. The Project would not introduce any new factors that could physically divide an established community, such as constructing major highways/roadway, storm channel, bridge, or utility transmissions. Therefore, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact.

Milpitas Metro Specific Plan

According to the City's General Plan 2040 Land Use Map, the Project Site is designated as "Milpitas Metro Specific Plan."[36] Under the Milpitas Metro Specific Plan (MMSP), the land use designation for the Project Site would remain designated as Business Park Research & Development, Limited Residential (BPDR-R). The BPRD-R identifies educational use as an allowable use. As a new preparatory school, the Project would be consistent with the MMSP. Further, he Project would include a total of 58,623 square feet of building area on a 130,680-square foot (three acres) site and would therefore have a floor to area ratio (FAR) of 0.44.

36 City of Milpitas, *City of Milpitas General Plan 2040.* March 2021. Available online at: https://static1.squarespace.com/static/57277b461d07c02f9c2f5c2c/t/60906e6349539311604cae70/1620078198914/Milpitas+General+Plan_Final_online+version.pdf, accessed January 5,2024.

It should be noted that MMSP provides minimum FAR requirements for mixed-use (1.0-5.0), and office uses (1.0) in BPRD-R zones and excludes minimum FAR requirements for school uses.[37] Therefore, the Project would include a less intensive use than what was analyzed in the MMSP. As discussed in **Section 2.0, Project Description**, the Project would also include a Development Agreement that outlines the terms and conditions for the Project. This approach will ensure that any deviations from the MMSP or the Zoning Code are appropriately mitigated and managed.

The Project would have a maximum height of 49 feet and would therefore meet the MMSP's maximum height requirement for BPRD-R uses of 275 feet. The Project would be consistent with the MMSP's applicable land use policies and metro plan area guidelines, and district guidelines. Thus, the Project would be consistent with the requirements to be in a designated BPRD-R zone. As such, the Project would be consistent with the MMSP, and impacts would be less than significant.

City of Milpitas General Plan 2040

Table 3.11-1, Project Consistency with Applicable General Plan 2040 Policies, analyzes the Project's consistency with applicable goals and policies in the General Plan. As shown, the Project would be consistent with all applicable General Plan policies. Thus, the impacts to the applicable policies of the General Plan 2040 would be less than significant.

Table 3.11-1
Project Consistency with Applicable General Plan 2040 Policies

Relevant Policy	Project Consistency Analysis
Goal LU-1 Accommodate a well-balanced mix of land uses that meets the diverse needs of Milpitas residents, businesses, and visitors with places to live, work, shop, be entertained and culturally enriched	
Policy LU 1-6 Ensure adequate school sites by allowing new schools to be located in a variety of compatible land use designations, including residential, commercial, public facilities, and mixed-use designations.	**Consistent.** The Project Site is designated as MPDR-R and zoned for Commercial (C2) with a Transit Oriented Development (TOD), therefore the Project would provide an adequate school site in a compatible land use designation.
Goal LU-4: Coordinate and integrate land use and transportation objectives.	
Policy LU 4-2 Emphasize efforts to reduce regional vehicle miles traveled by supporting land use patterns and site designs that promote active modes of transportation, including walking, biking, and public transit.	**Consistent.** As discussed in **Section 17**, **Transportation**, the Project would not result in significant impacts to vehicle miles traveled (VMT). Additionally, the Project would install new bicycle facilities on-site, such as bicycle parking spaces.

37 City of Milpitas. *City of Milpitas Metro Specific Plan*. February 2023. Available online at: https://www.milpitas.gov/DocumentCenter/View/3428/2023-Metro-Specific-Plan-PDF?bidId=, accessed January 5,2024.

Relevant Policy	Project Consistency Analysis
Goal CD-1: Strengthen Milpitas' identity and sense of place by reinforcing the community's distinctive, high-quality community form, natural landscape, and character	
Policy CD 1-1: Require development projects to: A. Preserve positive characteristics and unique features of the site; and B. Incorporate a context-sensitive design approach that considers the scale and existing and desired character of adjacent uses and the surrounding neighborhood or district.	**Consistent**. The Project would be designed in similar character and design as the adjacent preparatory school immediately south of the Project Site. Thus, Project design would be context-sensitive and consistent with the desired character of adjacent uses.
Goal CD-2 Ensure project designs reinforce a sense of place, display design excellence, and are cohesive and sensitive to the surrounding build environment and natural landscape.	
Policy CD 2-2 Continue to develop and implement design standards and guidelines for residential, non-residential, and infrastructure development, both in the private and public realms, consistent with state law, to provide design and site planning approaches, landscaping, site grading and similar architectural and site planning criteria that will add design excellence, visual quality and interest to the community.	**Consistent.** As discussed below, the Project would be consistent with the development standards of BPRD-R uses and the BPRD-R zoning district, as detailed in the MMSP. Furthermore, the architectural and landscaping components of the Project would be consistent with the design guidelines of the MMSP.
Policy CD 2-7 Include design elements during the development review process that address security, aesthetics and safety. Safety issues include, but are not limited to, minimum clearances around buildings, fire protection measures such as peak load water requirements, construction techniques, and minimum standards for vehicular, bicycle, and pedestrian facilities and other standards set forth in local, state, and federal regulations	**Consistent.** As a standard condition of approval, the Project would include the proposed renderings and design elements as part of the planning application that would subject to the City's reviewal and approval.
Policy CD 2-8 Minimize the visual impact of wireless telecommunication facilities by designing them as an integral architectural feature to a site or structure.	**Consistent.** The Project would not introduce new telecommunication facilities (i.e., telecommunication towers) on-site.
Goal CON-1Ensure a sustainable future for the city of Milpitas by promoting a carbon free energy future that increases renewable resources, conservation, and efficiency throughout the city.	
Policy CON 1-1 Ensure that new development is consistent with the energy objectives and targets identified by the City's Climate Action Plan (CAP).	**Consistent.** As concluded in **Section 8, Greenhouse Gas Emissions**, the Project would be consistent with the strategies and measures outlined in the City's CAP.
Policy CON 1-2 Ensure all development projects comply with the mandatory energy efficiency requirements of the California Green Building Standards Code (CALGreen).	**Consistent.** As discussed in **Section 6, Energy**, the Project would comply with all CALGreen requirements.
Policy CON 1-3 Support innovative green building best management practices including, but not limited to, LEED certification, and encourage project applicants to exceed the most current "green" development standards in the California Code of Regulations (CCR), Title 24, as feasible.	**Consistent.** As discussed in **Section 6, Energy**, the Project would ensure that all buildings-onsite would-be LEED Silver certified, in compliance with the CALGreen Code.

Relevant Policy	Project Consistency Analysis
Goal CON-2 Protect and enhance native trees and vegetation throughout the city	
Policy CON 2-3 Avoid removal of large, mature trees that provide wildlife habitat, visual screening, or contribute to the visual quality of the environment through appropriate project design and building siting. If full avoidance is not possible, prioritize planting of replacement trees on-site over off-site locations. Replacement trees for high-quality mature trees should generally be of like kind, and provide for comparable habitat functionality, where appropriate site conditions exist.	**Consistent.** Although the Project would remove 35 trees on-site, the Project would plant 6 new trees and preserve 58 trees on-site to maintain the overall visual quality of the Project Site to the same level as the site's existing conditions.
Goal CON-7 Implement a proactive approach to maintain and improve air quality within Milpitas and the region	
Policy CON 7-2 Minimize exposure of the public to toxic or harmful air emissions and odors through requiring an adequate buffer or setback distance between residential and other sensitive land uses and land uses that typically generate air pollutants, toxic air contaminants, or obnoxious fumes or odors, including but not limited to industrial, manufacturing, and processing facilities, high-volume roadways, and industrial rail lines. New sensitive receptors, such as residences (including residential care and assisted living facilities for the elderly), childcare centers, schools, playgrounds, churches, and medical facilities shall be located away from existing point sources of air pollution such that excessive levels of exposure do not result in unacceptable health risks. Compliance shall be verified through the preparation of a Health Risk Assessment when deemed necessary by the Planning Director.	**Consistent.** As discussed in **Section 2**, **Air Quality**, the Project would not exceed the Bay Area Air Quality Management District construction and operational thresholds for emissions of the region's identified criteria pollutants (i.e., ROG, NOx, CO, SO_2, PM_{10} and $PM_{2.5}$). **Section 2** of this IS/MND also concluded that the Project would not have the potential to expose sensitive receptors to substantial pollutant concentrations, as students are only on-campus during school hours and because diesel exhaust emissions would be low and short term. Furthermore, due to the Project Site's distance to stationary sources of TAC emissions, the Project would not contribute to human health risk to nearby receptors during operation, and the Project would also not contribute to any cumulative human health risk impact

Source: City of Milpitas General Plan 2040. Dated 2014.

City of Milpitas Zoning

The Project Site is currently zoned by the City as General Commercial (C2). Under Section XI-10-5.02 (Commercial Use Regulations) of the City's Municipal Code, private schools (elementary, middle, high) would be considered as an acceptable use under C2 zoning, provided that a Conditional Use Permit (CUP) is issued to the Project Applicant prior to Project approval. Prior to issuance of the CUP, the Project site plan and supporting documents would be reviewed and considered by the City as part of the Project Application submitted by the Project Applicant. As stated in XI-10-5.04 (Commercial Zone Special Development Standards) of the City's Municipal Code, the Planning Commission shall consider site conditions and design elements of the Project prior to the issuance of a CUP. The Project would renovate the existing office building and would not alter the current size, height, massing, and setback of the existing building. The new building under the Project (i.e., gymnasium) would be inconsistent with two

development standards outlined in Table XI-10-5.03-1, Commercial Zone General Development Standards, of the City's Municipal Code as it would not meet the Floor Area Ratio and building height requirements. To address areas of nonconformity, the Project will include a Development Agreement. The Development Agreement is a legally binding contract between the Project Applicant and the City that outlines the terms and conditions for the Project. This approach will ensure that any deviations from the MMSP or the Zoning Code are appropriately mitigated and managed, providing a mechanism for the City to ensure compliance with its planning objectives while accommodating the needs of the Project. Approval of the Development Agreement will be adopted as an ordinance by the City Council, as part of the Project approval process.. Upon approval and issuance of the CUP and the Development Agreement, the Project would be consistent with the City's Municipal Code.

In conclusion, the Project would be generally consistent with the relevant policies and standards under the MMSP, City's General Plan and Municipal Code for development in BPRD-R and C2 zones.

Therefore, the Project would not conflict with any local land use plan, policy, or regulation, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

12. Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. According to the California Department of Conservation, Division of Mine Reclamation, there are no active mines within the City.[38] Although there are known mineral resources in Santa Clara County and the region, the Project Site is not located within an area that is known to contain regionally significant mineral resources.[39] Thus, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As stated above, there are no active mines within the City or the Project Site. Additionally, the four areas identified by the City to contain "Regionally Significant Construction Aggregate Resources" are located outside of the City's jurisdiction and are part of the South San Francisco Bay Production-Consumption Region.[40] The Project would not result in the loss of availability of a locally important

38 California Department of Conservation, "Mines Online." Available online at: https://maps.conservation.ca.gov/mol/index.html, accessed December 15, 2023.

39 California Department of Conservation, "Update of Mineral Land Classification: Aggregate Materials in the South San Francisco Bay Production-Consumption Region." 1996.

40 City of Milpitas, *Draft Environmental Impact Report for the Milpitas General Plan Update*. November 2020. Available online at: https://www.milpitas.gov/DocumentCenter/View/1168/Draft-EIR-PDF?bidId=, accessed January 11, 2024.

mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. No impact would occur.

Mitigation Measures: No mitigation measures are required.

13. Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise	☐	☐	☐	☒

Characteristics of Noise

Noise is usually defined as unwanted sound that is an undesirable byproduct of society's normal day-to-day activities. Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, and/or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). The human ear does not respond uniformly to sounds at all frequencies. For example, the human ear is less sensitive to low and high frequencies than medium frequencies, which more closely correspond with human speech. In response to the sensitivity of the human ear to different frequencies, the A-weighted noise level (or scale), which corresponds better with people's subjective judgment of sound levels, has been developed. This A-weighted sound level, referenced in units of dBA, is measured on a logarithmic scale such that a doubling of sound energy results in a 3 dBA increase in noise level. Typically, changes in a community noise level of less than 3 dBA are not noticed by the human ear.[41] Changes from 3 to 5 dBA may be noticed by some individuals who are sensitive to changes in noise. A greater than 5 dBA increase is readily noticeable, while the human ear perceives a 10 dBA increase in sound level to be a doubling of sound.

41 California Department of Transportation. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. 2013. Available online at: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf, accessed January 5, 2024.

On the A-weighted scale, the range of human hearing extends from approximately 3 to 140 dBA. **Table 3.13-1, A-Weighted Decibel Scale**, provides examples of A-weighted noise levels from common sources. Noise sources occur in two forms: (1) point sources, such as stationary equipment or individual motor vehicles; and (2) line sources, such as a roadway with a large number of point sources (motor vehicles). Sound generated by a point source typically diminishes (attenuates) at a rate of 6 dBA for each doubling of distance from the source to the receptor at acoustically "hard" sites and 7.5 dBA at acoustically "soft" sites.[42,43] For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.[44]

Table 3.13-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA, Leq)
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35

Source: United States Occupational Safety & Health Administration, Noise and Hearing Conservation Technical Manual, 1999.

Sound levels also can be attenuated by man-made or natural barriers (e.g., sound walls, berms, and ridges), as well as elevational differences. Noise is most audible when traveling by direct line-of-sight, an uninterrupted visual path between the noise source and noise receptor. Barriers, such as walls or buildings that break the line-of-sight between the source and the receiver, can greatly reduce noise levels from the

42 Federal Highway Administration, *Highway Traffic Noise: Analysis and Abatement Guidance,* 2011. Available online at: https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/revguidance.pdf, accessed January 5, 2024.

43 Examples of "hard" or reflective sites include asphalt, concrete, and hard and sparsely vegetated soils. Examples of acoustically "soft" or absorptive sites include soft, sand, plowed farmland, grass, crops, heavy ground cover, etc.

44 Federal Highway Administration, *Highway Traffic Noise: Analysis and Abatement Guidance,* 2011. Available online at: https://www.fhwa.dot.gov/environment/noise/regulations_and_guidance/analysis_and_abatement_guidance/revguidance.pdf, accessed January 5, 2024.

source since sound can only reach the receiver by diffraction. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is greatly reduced.

Equivalent Noise Level

Equivalent Noise Level (Leq) is the sound level corresponding to a steady-state A-weighted sound level containing the same total energy as several single event noise exposure level events during a given sample period. Leq is the "acoustic energy" average noise level during the period of the sample. It is based on the observation that the potential for noise annoyance is dependent on the total acoustical energy content of the noise. The equivalent noise level is expressed in units of dBA. Leq can be measured for any period, but is typically measured for 15 minutes, 1 hour, or 24 hours. Leq for a 1-hour period is used by the Federal Highway Administration (FHWA) for assessing highway noise impacts. Leq for 1 hour is referred to as the Hourly Noise Level (HNL) in the California Airport Noise Regulations and is used to develop Community Noise Equivalent Level values for aircraft operations. Construction noise levels and ambient noise measurements in this section use the Leq scale.

Characteristics of Vibration

Vibration consists of waves transmitted through solid material. Groundborne vibration propagates from a source through the ground to adjacent buildings by surface waves. Vibration may comprise a single pulse, a series of pulses, or a continuous oscillatory motion. The frequency of a vibrating object describes how rapidly it is oscillating and is measured in hertz (Hz). Most environmental vibrations consist of a composite, or "spectrum" of many frequencies, and are generally classified as broadband or random vibrations. The normal frequency range of most groundborne vibration that can be felt generally starts from a low frequency of less than one Hz to a high of about 200 Hz. Vibration is often measured in terms of the peak particle velocity (PPV) in inches per second (in/sec) when considering impacts on buildings or other structures, as PPV represents the maximum instantaneous peak of vibration that can stress buildings. Because it is a representation of acute vibration, PPV is often used to measure the temporary impacts of short-term construction activities that could instantaneously damage existing structures. Vibration is often also measured by the Root Mean Squared (RMS) because it best correlates with human perception and response. Specifically, RMS represents "smoothed" vibration levels over an extended period of time and is often used to gauge the long-term chronic impact of a project's operation on the adjacent environment. RMS amplitude is the average of a signal's squared amplitude. It is most commonly measured in decibel notation (VdB).

Vibration energy attenuates as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. High frequency vibrations reduce much more rapidly than low

frequencies, so that in the far-field from a source, the low frequencies tend to dominate. Soil properties also affect the propagation of vibration. When groundborne vibration interacts with a building, there is usually a ground-to-foundation coupling loss (i.e., the foundation of the structure does not move in sync with the ground vibration), but the vibration can also be amplified by the structural resonances of the walls and floors. Vibration in buildings is typically perceived as rattling of windows or items on shelves, or the motion of building surfaces. At high levels, vibration can result in damage to structures.

Manmade groundborne vibration is generally limited to areas within a few hundred feet of certain types of construction activities, especially pile driving. Road vehicles rarely create enough groundborne vibration to be perceptible to humans unless the road surface is poorly maintained and there are potholes or bumps. If traffic induces perceptible vibration in buildings, such as window rattling or shaking of small loose items (typically caused by heavy trucks in passing), then it is most likely an effect of low-frequency airborne noise or ground characteristics.

Regulatory Framework

Federal Transit Administration Vibration Guidance

The Federal Transit Administration (FTA) has published guidance relative to vibration impacts. Construction vibration damage criteria are assessed based on structural category (e.g., reinforced-concrete, steel, or timber). The FTA guidelines consider 0.2 inch/sec PPV to be the significant impact level for non-engineered timber and masonry buildings. Structures or buildings constructed of reinforced concrete, steel, or timber have a vibration damage criterion of 0.5 inch/sec PPV pursuant to FTA guidelines.[45] The FTA guidelines include a table showing the vibration damage criteria based on structural category and is presented below in **Table 3.13-2, Construction Vibration Damage Criteria.**

45 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018. Available online at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed December, 1, 2023.

Table 3.13-2
Construction Vibration Damage Criteria

Building/Structural Category	PPV, in/sec
I. Reinforced-concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

Source: Federal Transit Administration. 2018. Transit Noise and Vibration Impact Assessment Manual.

Local Plans and Policies

City of Milpitas 2040 General Plan

The Noise Element of the *General Plan* contains goals, policies, and actions that seek to reduce community exposure to excessive noise levels through the establishment of noise level standards for a variety of land uses.[46] The Noise Element includes information on existing and projected noise conditions with policies and programs to maintain or reduce noise from transportation, land use operations and single-event noise. Applicable Goals, Policies and Actions include:

Goal N-1: Preserve a nuisance-free noise environment for existing and future land uses by minimizing exposure to harmful and excessive noise levels.

Policy N 1-1: Consider the noise compatibility of existing and future development when making land use planning decisions. Require development and infrastructure projects to be consistent with the land use compatibility standards contained in Tables N-1 and N-2 to ensure acceptable noise exposure levels for existing and future development.

Policy N 1-2: Require new development to mitigate excessive noise to the standards indicated in Tables N-1 and N-2 through best practices, including building location and orientation, building design features, placement of noise-generating equipment away from sensitive receptors, shielding of noise-

46 City of Milpitas, *General Plan 2040,* adopted March 9, 2021. Available online at: https://static1.squarespace.com/static/57277b461d07c02f9c2f5c2c/t/60906e6349539311604cae70/1620078198914/Milpitas+General+Plan_Final_online+version.pdf, accessed December 1, 2023

generating equipment, placement of noise-tolerant features between noise sources and sensitive receptors, and use of noise-minimizing materials.

Policy N 1-3: Use sound walls for sound attenuation only when other measures are not practical, or when recommended by an acoustical expert as part of a mitigation measure. Sound walls shall be designed to be aesthetically pleasing, and should incorporate features such as vegetation, variations in color and texture, artwork, and other features deemed appropriate by the City.

Policy N 1-5: Require acoustical studies for new discretionary developments and transportation improvements that have the potential to affect existing noise-sensitive uses such as schools, hospitals, libraries, care facilities, and residential areas; and for projects that would introduce new noise-sensitive uses into an area where existing noise levels may exceed the thresholds identified in this element.

Policy N 1-6: For projects that are required to prepare an acoustical study to analyze noise impacts, the following criteria shall be used to determine the significance of those impacts:

Stationary and Non-Transportation Noise Sources

A significant impact will occur if the project results in an exceedance of the noise level standards contained in this element. In instances where the ambient noise level is already above the standards contained in this element, a significant impact will occur if the project will result in an increase in ambient noise levels by more than 3 dB. This does not apply to temporary construction activities.

Transportation Noise Sources

Where existing traffic noise levels are 60 dB Ldn or less at the outdoor activity areas of noise-sensitive uses, a +5 dB Ldn increase in roadway noise levels will be considered significant;

Where existing traffic noise levels are greater than 60 dB Ldn and up to 65 dB Ldn at the outdoor activity areas of noise-sensitive uses, a +3 dB Ldn increase in roadway noise levels will be considered significant; and

Where existing traffic noise levels are greater than 65 dB Ldn at the outdoor activity areas of noise-sensitive uses, a +1.5 dB Ldn increase in roadway noise levels will be considered significant.

Applicable Actions in Support of Goal N-1

Action N-1a: Require that new development projects are reviewed for compliance with the noise requirements established in this element, including the standards established in Tables N-1 and N-2, prior to project approval.

Action N-1b: Require acoustical studies for new development projects which have the potential to generate noise impacts which exceed the standards identified in this element. The studies shall include representative noise measurements, estimates of existing and projected noise levels, and mitigation measures necessary to ensure compliance with the noise standards included in this element. Studies shall be conducted by a qualified acoustical professional.

Action N-1c: Require developers to prepare a construction management/noise mitigation plan that defines best management practices to reduce construction noise, and includes proposed truck routes (that comply with Section 12 V-100-12.05 - Truck Routes of the Milpitas Municipal Code) as part of the entitlement process.

Action N-1d: During the environmental review process, determine if proposed construction will constitute a significant impact on nearby sensitive receptors and, if necessary, require mitigation measures in addition to the standard best practice controls. Suggested best practices for control of construction noise include:

Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 am and 7:00 pm. No construction shall occur on National holidays.

All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.

The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists.

At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences.

Unnecessary idling of internal combustion engines shall be prohibited for a duration of longer than five minutes.

Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction activities, to the extent feasible.

Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing.

The construction contractor shall designate a "noise disturbance coordinator" who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall be responsible for determining the cause of the noise complaint (e.g., starting too early, poor muffler, etc.) and instituting reasonable measures as warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.

Table 3.13-3
Noise and Land Use Compatibility Guidelines (City of Milpitas Noise Element)

Land Use Category	Exterior Noise Exposure (Ldn) 55	60	65	70	75	80
Single-Family Residential						
Multi-Family Residential, Hotels, and Motels						
Outdoor Sports and Recreation, Neighborhood Parks, and Playgrounds						
Schools, Libraries, Museums, Hospitals, Personal Care, Public Assembly						
Office Buildings, Business Commercial, and Professional						
Industrial						

Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special insulation requirements.

Conditionally Acceptable - Specified land use may be permitted only after detailed analysis of the noise reduction requirements and needed noise insulation features included in the design.

Unacceptable - New construction or development should generally not be undertaken because mitigation was found to be infeasible to comply with noise element policies.

**Please note that these guidelines are general and may not apply to specific sites.*
Source: City of Milpitas. General Plan Noise Element. Table N-1.

City of Milpitas Municipal Code

Chapter 213, Noise Abatement, of Title V – PUBLIC HEALTH, SAFETY AND WELFARE, of the City of Milpitas Municipal Code (MMC) sets noise standards for construction and operation activities as follows:[47]

- *V-213-3 - Unlawful to Create or Permit Disturbing Noise*
- *(a)Residential Zone Regulations.*
    - *3.01 Except as permitted in Section V-213-3(b), it shall be unlawful for any person in any district zoned for residential use (under the provisions of Chapter 10, Title XI of the*

47 City of Milpitas. *Municipal Code*. Available online: https://library.municode.com/ca/milpitas/codes/code_of_ordinances?nodeId=TITVPUHESAWE_CH213NOAB_213-3UNCRPEDINO accessed December 12, 2023.

Milpitas Municipal Code) to make, continue, maintain, permit or cause to be made, continued, maintained, or permitted any Disturbing Noise that increases the noise exposure level by three dB over the local ambient noise level measured from the property line of the noise source, or more than 65 dB measured from the property line of the noise source, whichever is more restrictive.

- *3.02 Except as permitted in Section V-213-3(b), it shall be unlawful for any person who owns, possesses, or controls any real property in any district zoned for residential use (under the provisions of Chapter 10, Title XI of the Milpitas Municipal Code) to make, continue, maintain, permit or cause to be made, continued, maintained or permitted any Disturbing Noise that increases the noise exposure level by three dB over the local ambient noise level measured from the property line of the noise source, or more than 65 dB measured from the property line of the noise source, whichever is more restrictive.*

- *3.03 Notwithstanding any other provision of this Chapter and in addition thereto, it is unlawful for any person or any person who owns, possesses, or controls real property in any district zoned for residential use (under provisions of Chapter 10, Title XI of the Milpitas Municipal Code) to make, continue, maintain, permit, or cause to be made, continued, maintained or permitted any Disturbing Noise. It shall be prima facie violation of this Section if any Disturbing Noise is audible during the hours of 10:00 p.m. to 7:00 a.m. from a distance of 50 feet from the property line of the noise source or from a distance of 100 feet from any nonstationary noise source. It shall also be prima facie violation of this Section if any Disturbing Noise is audible during the hours of 7:01 a.m. to 9:59 p.m. from a distance of 100 feet from the property line of the noise source or any nonstationary noise source.*

- *3.04 The above prohibition against making, continuing, maintaining or permitting any Disturbing Noise in any district zoned for residential use shall not apply to the authorized collection of solid waste, recyclables, and/or yard trimmings by an authorized collector beginning at 6:00 a.m.*

    - *(b)Outdoor Music Regulations for Commercial and Mixed Use Zones.*

- *3.05 Outdoor music shall be permitted on real property in the C1, C2, TC, MXD, MXD2, and MXD3 zoning districts (per Chapter 10, Title XI of the Milpitas Municipal Code) as an accessory use to a restaurant or bar that is a principal permitted use or approved conditional use. Outdoor music shall be permitted between the hours of 9:00 a.m. and 11:00 p.m.*

- *3.06 Except as provided below in Subsection V-213-3(b) 3.06(1), noise levels for outdoor music as an accessory use shall not exceed 70-90 dB measured from the property line of the parcel on which the outdoor music occurs. See also "Table XI-10-5.02-1 - Commercial Zone Uses" in Title XI, Chapter 10, Section 5.02 and "Table XI-10-6.02-1 - Mixed Use Zone Uses" in Title XI, Chapter 10, Section 6.02.*

    - *(1)For any parcel in a C1, C2, TC, MXD, MXD2, or MXD3 zoning district that is located within 100 feet of a parcel in a R1 or R2 zoning district, noise levels for outdoor music as an accessory use shall not exceed 65 dB measured from the property line of*

the parcel on which the outdoor music occurs.(2)For residential uses in the MXD, MXD2, and MXD3 zoning districts, it is recognized that ambient noise from outdoor music that is permitted as an accessory use to a restaurant or bar is a normal condition inherent to a mixed-use, urban living environment; therefore accessory outdoor music at a restaurant or bar shall not be subject to the noise restrictions in Section V-213-3(a) 3.01 and 3.02 in the case of residential uses in the MXD, MXD2, and MXD3 zones.

- *(c)Site Construction Regulations.*

- *3.07 No person shall engage or permit others to engage in construction of any building or related road or walkway, pool or landscape improvement or in the construction operations related thereto, including, delivery of construction materials, supplies, or improvements on or to a construction site except within the hours of 7:00 a.m. to 7:00 p.m. on weekdays and weekends. No construction work shall be conducted or performed on the holidays indicated in Section V-213-2-2.05 of this Chapter.*

- *3.08 Exemption from Off-Site Construction Regulations. Exempt from the Off-Site Construction Regulations of this article are as follows:*

  - *(1)Emergency construction and repair that is necessary for protection of life and property,(2)Operation preempted from local regulation by state law, such as construction of public school buildings,(3)Furnishing utility-type service including construction and maintenance of utility facilities,(4)Any work on an existing single-family or duplex (two-family) dwelling undertaken by the property owner,(5)Operation to construct and maintain facilities within the public right-of-way as deemed necessary by the Public Works Director, and(6)Any other circumstances where the City Manager deems that an exemption would be appropriate.*

Environmental Setting

Existing Ambient Noise Levels

To establish baseline noise conditions, existing noise levels were monitored at four locations in the vicinity of the Project Site. The locations of the noise measurements are depicted in **Figure 3.0-1, Noise Monitoring and Sensitive Receptor Location Map**. The noise survey was conducted in December 2023 using the Larson Davis SoundTrack LxT (Type 1) sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1. This instrument was calibrated and operated according to the manufacturer's written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above grade. The results of the measurements are summarized in **Table 3.13-4, Existing Noise Levels in the Vicinity of the Project Site**. As shown in **Table 3.13-4**, the ambient noise levels ranged from 63.7 dBA Leq to 66.1 dBA Leq in the vicinity of the Project Site. In addition, based on the measurement data collected at Location 1 (located on the eastern boundary of the

Project Site), the existing on-site noise level for the Project Site is 72.5 dBA Ldn, as shown in **Appendix C Noise Data**.

Table 3.13-4
Existing Noise Levels in the Vicinity of the Project Site

Noise Monitoring Locations		Primary Noise Sources	Noise Levels (dBA)		
			Leq	Lmin	Lmax
1. Falcon Drive	Morning Drop Off	Morning Student Drop Off Vehicle Traffic	64.6	57.2	81.0
	After School Pick Up	After School Pick Up Vehicle Traffic, Car Honking, Retail Vehicle Traffic	66.1	54.5	79.5
2. Great Mall Drive		Morning Student Drop Off Vehicle Traffic	64.7	57.7	79.6
3. Northwest Corner of the Project Site		Vehicle Traffic, Train	63.8	59.0	79.3
4. Centre Pointe Drive Apartments		Vehicle Traffic, Neighborhood Activity	63.7	51.9	77.8

*Source: Impact Sciences, Inc., December 2023. See **Appendix C**.*

SOURCE: Esri, 2024

FIGURE **3.0-1**

Noise Monitoring and Sensitive Receptor Locations

IMPACT SCIENCES

1451.002•01/24

Existing Vehicle Traffic Noise Levels

Existing roadway noise levels were calculated for primary roadway segments located in the vicinity of the Project Site. The roadways selected are representative of the segments that would be most impacted by an increase in traffic according to the Project's transportation engineer.[48]

Calculations of the existing roadway noise levels are based on the Federal Highway Administration Highway Noise Prediction Model (FHWA-RD-77-108) and traffic volumes from the Project's Transportation Analysis.[49] The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) utilized in the FHWA Model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The Caltrans data show that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along study area roadway segments are presented in **Table 3.13-5, Existing Roadway Noise Levels**.

Table 3.13-5
Existing Roadway Noise Levels

Roadway	Roadway Segment	Existing Land Uses Along Segment	dBA Ldn
Falcon Drive	Between Montague Exp and Site Driveway	Commercial	61.0
	Between Site Driveway and Great Mall Drive	Commercial	61.0
Great Mall Drive	Between Mustang Drive and Site Driveway	Commercial	59.9
	Between Site Driveway and Falcon Drive	Commercial	59.8

*Source: Impact Sciences, January 2024. See **Appendix C, Noise Data**.*
Traffic data: Hexagon Transportation Consultants, Inc., 1323 Great Mall Drive Stratford School, Traffic Operations Analysis, January 8, 2024. Report available on file with the City Planning Department.

Existing Groundborne Vibration

The main sources of groundborne vibration near the Project Site are heavy-duty vehicular travel (e.g., refuse trucks, delivery trucks, and transit buses) on local roadways and I-880. Trucks and buses typically

48 Hexagon Transportation Consultants, Inc., *1323 Great Mall Drive Stratford School, Traffic Operations Analysis*, January 8, 2024. Report available on file with the City Planning Department.

49 See **Appendix C** for roadway noise calculations.

generate groundborne vibration velocity levels of around 63 VdB at 50 feet, and these levels could reach 72 VdB where trucks and buses pass over bumps in the road.[50] In terms of PPV levels, a heavy-duty vehicle traveling at a distance of 50 feet can result in a vibration level of approximately 0.001 inch per second.

Noise Sensitive Receptors

Noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for individuals to be exposed to increased and prolonged exposure to both interior and exterior noise levels. According to the City's Noise Element, noise-sensitive uses include schools, hospitals, libraries, care facilities, and residential areas.[51] The closest noise-sensitive receptors to the Project Site include: the existing Stratford School adjacent to the south of the Project Site; existing vacant land approximately to the west that is currently under construction and is anticipated to operate as a multi-family apartment complex by the time the Project begins operations (551 ft); Centre Pointe Drive apartments to the west of the Project Site (511 ft); and, the Capitol Apartments south of the Project Site (645 ft) (See **Figure 3.0-1, Noise Monitoring and Sensitive Receptor Location Map.**)

Would the project:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant Impact.

Construction Noise Impacts

Construction activities associated with the Project would result in temporary noise level increases in the vicinity of the Project Site on an intermittent basis and, as such, could expose nearby sensitive receptors to increased noise levels. The increase in noise at off-site sensitive receptors during construction of each phase of construction under the Project would be temporary in nature and would not generate continuously high noise levels, although occasional single-event disturbances from construction would occur. Construction noise would typically be higher during the heavier periods of initial construction (i.e., demolition and

---

50 Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*. 2018. Available online at: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed March, 14, 2023.

51 City of Milpitas, *General Plan Noise Element*, see Policy N 1-5.

grading work) and reduced in the later construction phases (i.e., interior building construction) because the physical structure of the buildings would break line-of-sight noise transmission from the construction area to the nearby sensitive receivers. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receivers, and presence or absence of intervening structures, terrain, or other noise attenuation barriers.

Table 3.13-6, Estimated Construction Noise Levels, shows the maximum expected noise levels at sensitive receptors in the vicinity of the Project Site. The analysis shows the maximum noise levels from the use of equipment anticipated to be used during demolition, grading and building construction.

Table 3.13-6
Estimated Construction Noise Levels

Sensitive Land Uses	Distance to Project Site (feet)	Estimated Construction Noise Levels [dBA]	Exceed FTA Threshold of 80 dBA Leq?
1. Existing Stratford School (nearest school building)	165	72.6	No
2. Centre Pointe Drive Apartments	511	60.6	No
3. Vacant Land Under Construction - anticipated to operate as a multi-family apartment complex	551	62.2	No
4. Capitol Apartments	645	58.5	No

*Source: Impact Sciences, January 2024. See **Appendix C** for equipment noise data sheets and assumptions.*

As shown in **Table 3.13-6**, construction activity would generate noise levels of up to 72.6 dBA Leq at the nearest existing sensitive receptor (Sensitive Receptor No. 4). As such, temporary construction noise would not exceed the FTA's 80 dBA Leq daytime construction threshold. Furthermore, the Project would be consistent with Chapter 213 of Title V of the City's Municipal Code, which prohibits construction activities outside of the hours of 7:00 a.m. to 7:00 p.m. on weekdays and weekends, and on holidays except during emergencies. It should also be noted that the Project would be required to comply with Noise Element Action N-1d, which requires the Project Applicant to implement standard best practices to limit construction noise levels to the extent feasible. Notwithstanding the implementation of best practices, because the Project would be consistent with the construction hours identified in the City's Municipal Code and because Project construction noise would not exceed the FTA's 80 dBA Leq daytime construction threshold, impacts would be less than significant.

Operational Noise Impacts

Traffic Noise

The Project would increase the number of vehicle trips within the vicinity of the Project Site which would increase traffic noise on roadways. To determine whether the Project would create traffic noise resulting in a significant noise increase, existing and potential future noise levels were calculated based on the FHWA Traffic Noise Model consistent with data provided by the Project's transportation engineer[52] (see **Appendix C**). The noise increases between the Existing and Existing Plus Project scenarios are shown in **Table 3.13-7**, **Project Traffic Noise**.

Table 3.13-7
Project Traffic Noise

Roadway	Roadway Segment	dBA Ldn		
		Existing	Existing Plus Project	Project Increase
Falcon Drive	Between Montague Exp and Site Driveway	61.0	61.8	0.8
	Between Site Driveway and Great Mall Drive	61.0	62.4	1.4
Great Mall Drive	Between Mustang Drive and Site Driveway	59.9	62.2	2.3
	Between Site Driveway and Falcon Drive	59.8	61.5	1.7

*Source: Impact Sciences, January 2024. See **Appendix C**.*
Traffic data: Hexagon Transportation Consultants, Inc., 1323 Great Mall Drive Stratford School, Traffic Operations Analysis, January 8, 2024. Report available on file with the City Planning Department

As shown in **Table 3.13-7**, **Project Traffic Noise**, the Project would increase local traffic noise levels by a maximum of 2.3 dBA Ldn along Falcon Drive. As discussed previously, where existing traffic noise levels are greater than 60 dBA Ldn and up to 65 dBA Ldn at the outdoor activity areas of noise-sensitive uses, a +3 dBA Ldn increase in roadway noise levels would be considered significant. Because the Project would increase local traffic noise levels by a maximum of 2.3 dBA Ldn along any segment, these thresholds would not be exceeded and impacts with respect to operational traffic noise would be less than significant.

52 Hexagon Transportation Consultants, Inc., *1323 Great Mall Drive Stratford School, Traffic Operations Analysis*, January 8, 2024. Report available on file with the City Planning Department.

On Site Noise

Stationary Noise

The operation of the Project would generate on-site stationary noise from HVAC equipment. Noise from HVAC equipment serving the Project would typically generate noise in the range of 60 to 70 dBA Leq at a reference distance of 15 feet from the source.[53] As discussed previously, noise-sensitive receptors are located at least 165 feet from the Project Site and noise from HVAC equipment would attenuate at a rate of approximately 6 dBA per doubling of distance from the source. Thus, HVAC related noise would not exceed 52 dBA Leq at the nearest sensitive receptor. As shown in **Table 3.13-4,** ambient noise levels in the Project Site vicinity were measured between 63.7 dBA Leq to 66.1 dBA Leq. Based on estimated noise level of 52 dBA Leq at 165 feet for HVAC equipment, noise levels from such equipment would not exceed ambient noise levels at off-site sensitive receptors. Furthermore, HVAC units are traditionally rooftop-mounted and/or shielded from surrounding land uses, serving to block line-of-sight noise transmission to sensitive receptors. Impacts would be less than significant.

Playfield Noise

The proposed synthetic turf playfield would introduce noise sources associated with children playing. As noted above, the City's noise ordinance generally limits the generation of noise that exceeds the actual measured existing ambient noise level by 3 dB(A) DNL at neighboring properties. The day-night average sound level (Ldn or DNL) is an average noise level over a 24-hour period. Noise levels occurring between the hours of 10:00 PM and 7:00 AM are increased by 10 decibels (dB). This noise is weighted to take into account the decrease in community background noise of 10 dB(A) during this period.

A noise measurement was taken at the existing Stratford School's outdoor play area and noise levels reached 62.4 dBA Leq during typical play activities (see **Appendix C** for noise measurement data). As shown in **Table 3.13-4** above, ambient noise levels in the Project Site vicinity were measured between 63.7 dBA Leq to 66.1 dBA Leq. Thus, noise associated with the playfield would not exceed ambient noise levels in the area. Furthermore, as no playfield activity would occur during evening hours, there would be no potential to increase the day-night average noise levels at neighboring properties by 3 dBA. Impacts would be less than significant.

---

53 Illingworth & Rodkin. *Environmental Noise Assessment for Wal-Mart Expansion, Williamson Ranch Plaza – Antioch, California*. Available at: https://www.antiochca.gov/fc/community-development/planning/Walmart/DEIR-VOLII-APPENDICES-C-H/Appendix%20G%20Noise%20Assessment.pdf Accessed on March, 14, 2023.

Parking Noise

Operational noise sources are also associated with on-site parking and vehicle circulation, including delivery trucks and trash-hauling trucks. The Project is a K-12 preparatory school and would not cause a substantive increase in delivery or trash trucks in the Project area. Various noise events would occur periodically from the Project's parking uses. Such periodic events would include activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals. It should be noted that the existing urban environment of the Project Site currently generates noise levels associated with these parking and vehicular noise sources. Although the Project would increase the number of vehicles parking in the area, the types of noise would be similar to those currently occurring in the vicinity of the Project Site. Parking-related noise for the existing Stratford School was observed during field noise measurements. As detailed in **Appendix C,** parking noise levels were found to be 64.6 dBA Leq, which would be generally consistent ambient noise levels that range from 63.7 dBA Leq to 66.1 dBA Leq (see **Table 3.13-4**). Therefore, impacts would be less than significant.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact.

Vibration Impacts

Construction activities associated with the Project could intermittently generate vibration in the Project Site vicinity when it reaches building walls and floors of sensitive receptors. Vibration-generating equipment could include bulldozers and loaded trucks to move materials and debris, jackhammers to break apart concrete, and caisson drills for foundations. **Table 3.13-8, Vibration Source Levels for Construction Equipment**, identifies vibration velocity levels for equipment at various distances from the source.

Table 3.13-8
Vibration Source Levels for Construction Equipment

	Approximate PPV (in/sec)					Approximate RMS (VdB)				
Equipment	**25 Feet**	**50 Feet**	**60 Feet**	**75 Feet**	**100 Feet**	**25 Feet**	**50 Feet**	**60 Feet**	**75 Feet**	**100 Feet**
Large Bulldozer	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Caisson Drilling	0.089	0.031	0.024	0.017	0.011	87	78	76	73	69
Loaded Trucks	0.076	0.027	0.020	0.015	0.010	86	77	75	72	68
Jackhammer	0.035	0.012	0.009	0.007	0.004	79	70	68	65	61
Small Bulldozer	0.003	0.001	0.0008	0.0006	0.0004	58	49	47	44	40

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.

With respect to human annoyance, the FTA thresholds are 80 VdB at residences and buildings where people normally sleep, and 75 dB for institutional uses such as schools. With respect to building damage, the FTA guidelines consider 0.12 inch/sec PPV to be the significant impact level for buildings extremely susceptible to vibration damage, 0.2 inch/sec PPV to be the significant impact level for non-engineered timber and masonry buildings, 0.3 inch/sec PPV to be the significant impact level for engineered concrete and masonry, and 0.5 inch/sec PPV to be the significant impact level for reinforced-concrete, steel or timber.

Based on **Table 3.13-8**, construction equipment could reach vibration levels of 69 VdB at 100 feet. As such, the 80 VdB residential annoyance threshold would not be exceeded at the nearest residential receptor (Sensitive Receptor No. 2). In addition, the 75 VdB annoyance threshold for schools would not be exceeded at Sensitive Receptor No. 1. It should also be noted that construction-related vibration levels experienced would be temporary and intermittent and the Project would be consistent with Title V, Chapter 213 of the City's Municipal Code, which prohibits construction activities outside of the hours of 7:00 a.m. to 7:00 p.m. on weekdays and weekends, and on holidays except during emergencies. As such, construction-related vibration would not disturb residences during sensitive nighttime hours. Therefore, this impact would be less than significant.

Based on **Table 3.13-8**, construction equipment would reach a maximum of 0.011 PPV (in/sec) at 100 feet. The building nearest the Project Site is the existing school building 165 feet south on Falcon Drive. These vibration levels would not exceed the most conservative 0.12 inch/sec PPV threshold for buildings extremely susceptible to vibration damage. As such, construction-related vibration impacts with respect to building damage would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Site is not located in the vicinity of a private airstrip or airport land use plan. The closest airport to the Project Site is the Norman Y. Mineta San Jose International Airport located approximately 5.4 miles southwest of the Project Site. Additionally, the Project Site is located outside of the Airport Influence Area of the *Norman Y. Mineta San Jose International Airport Comprehensive Land Use Plan*.[54] Therefore, the Project would not expose residents at the Project Site to excessive airport-related noise levels. No impact would occur in this regard.

54 Walter B. Windus PE, Aviation Consultant, *Norman Y. Mineta San Jose International Airport Comprehensive Land Use Plan, Figure 8 "Airport Influence Area, November 16, 2016.*

14. Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than Significant Impact. A Project could induce population growth in an area either directly, through the development of new businesses, or indirectly, through the extension of roads or other infrastructure. The Project does not include the addition or removal of housing and thus would have no direct impact on population and housing forecasts for the area. Although the Project would increase the number of students and employees at the Project Site, it is anticipated that the future students and employees would primarily consist of existing residents in the Milpitas area. Estimating the number of families of future students and employees who may choose to relocate to the City would be highly speculative, since many factors influence personal housing location decisions (e.g., family income levels and the cost and availability of suitable housing in the local area). Nevertheless, in an effort to present a worst-case population growth scenario, this analysis assumes the Project would enroll a maximum of 500 students and employ 75 full-time employees, all of whom would permanently relocate to the City.

Based on the City's average household size of 3.13 persons, the Project could result in a maximum population increase of approximately 1,800 persons.[55] As of 2023, the City has an estimated population of 81,067 persons.[56] According to the City's General Plan Update Environmental Impact Report, the City's

[55] California Department of Finance, Demographic Research Unit, "E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2022, with 2020 Benchmark." May 2022.

[56] California Department of Finance Demographic Research Unit, "E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2022, with 2020 Benchmark." May 2022.

population is forecasted to reach an estimated 113,530 persons by the year 2040, representing a total increase of 31,933 persons.[57] The Project's potential maximum increase of 1,800 persons would represent approximately six percent of the City's projected increase in population between the years 2023 and 2040 (32,463 persons). However, this conservative estimate is based on the assumption that the maximum number of students and employees would be new to the City. It is more likely that the majority of the students are currently in attendance in the existing lower division Stratford school campuses. Furthermore, as discussed in **Section 11, Land Use and Planning**, the Project would be consistent with its designated land use under the MMSP as a BPRD-R. Thus, the anticipated population generation has been accounted for in the City's long-range planning documents. Therefore, the Project would not induce substantial unplanned population growth in an area, either directly or indirectly, and impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The Project would renovate an existing vacant office building into a new preparatory school and construct a new gymnasium and playfield. There are no existing residential facilities on-site. Thus, the Project would not displace substantial numbers of existing people or housing, and no impacts would occur.

Mitigation Measures: No mitigation measures are required.

57 City of Milpitas. *The City of Milpitas General Plan Update Environmental Impact Report*, November 2020. Available online at: https://www.milpitas.gov/DocumentCenter/View/1168/Draft-EIR-PDF?bidId=. Accessed January 2, 2024.

15. Public Services

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public facilities?	☐	☐	☒	☐

a) Fire protection?

Less than Significant Impact. Fire protection and other related services to the Project Site are provided by the Milpitas Fire Department (MFD). There are four fire stations in the City. The MFD offers fire protection and emergency services to the City, including fire suppression services, emergency medical services, rescue services, hazardous and toxic materials emergency response, coordination of City-wide disaster response efforts, enforcement of fire and life safety codes, enforcement of State and Federal hazardous materials regulations, and investigation of fire cause, arson and other emergency events for reason and origin.[58] The closest fire station to the Project Site is Fire Station One, located approximately 0.68 miles northwest of the Project Site.

As discussed in **Section 14**, **Population and Housing**, the Project would not result in a substantive increase in population within the City, nor would it generate growth beyond what has been accounted for in the City's long-range planning documents. Thus, the Project would not substantively increase the service population or demand for fire protection services. The Project would utilize the existing driveways along Great Mall Drive and Falcon Drive, which can accommodate emergency vehicles that are entering the Project Site. Additionally, a new fire service line would be installed and would connect to the existing water

58 City of Milpitas, "Fire," Available online at: https://www.milpitas.gov/milpitas/departments/fire/, accessed January 11, 2024.

mains located along Great Mall Drive. The proposed fire line and the overall Project design would be in accordance with the applicable design standards outlined in the 2022 California Building Code (CBC), Chapter 9, *Fire Protection and Life Safety Systems*. The Project would also be designed in accordance with the City's Municipal Code, Chapter 300 (Fire Code) which adopts by reference the 2022 editions of California Fire Code and the California Fire Code. The California Fire Code includes fire safety-related building standards for construction, access, water mains, fire flows, and hydrants. As such, impacts on fire protection services and facilities would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Police protection?

Less than Significant Impact. Law enforcement protection services for the City of Milpitas are provided by the Milpitas Police Department (MPD). The MPD station is located 2.62 miles north of the Project Site at 1275 North Milpitas Boulevard.

Construction activities associated with the Project may create a temporary increase in demand for MPD services at the construction site. However, construction activities would be required to comply with the emergency site access requirements outlined in the 2022 CBC. Project implementation would result in an increase in individuals on-site, potentially resulting in increased calls for service and traffic and traffic-related calls for the proposed school. However, as discussed in **Section 14**, **Population and Housing**, the Project would not result in a substantive increase in population within the City, nor would it generate growth beyond what has been accounted for in the City's long-range planning documents. Thus, the Project would not substantively increase the service population or demand for police fire protection services. The Project would have a total of five pedestrian access gates to the school grounds, each equipped with security locks to minimize potential criminal activity on-site. Further, the Project Site is currently within the MPD's service area and thus, the Project would not extend MPD's resources and staffing beyond their existing service area. As such, impacts to police protection and services would be less than significant.

Mitigation Measures: No mitigation measures are required.

c) Schools?

No Impact. As stated, the projected indirect population growth in the City from the Project would be nominal. The Project would provide an additional secondary school and would not warrant additional schools in the area. As such, no impacts to school facilities would occur.

Mitigation Measures: No mitigation measures are required.

d) Parks?

No Impact. The closest public park to the Project Site is Parc Metro Clubhouse, located 0.58 miles north of the Project Site at 330 Curtis Avenue.[59] As stated, the Project would not result in a substantial increase in the City's population and would not substantially increase the use of the City's parks and recreational facilities. As such, no impact would occur.

Mitigation Measures: No mitigation measures are required.

e) Other Public Facilities?

Less than Significant Impact. The City of Milpitas is served by the Santa Clara County Public Library District (County Library District). The County Library includes eight branch libraries that provide services to Santa Clara County.[60] The closest public library to the Project Site is the Milpitas Library (MPL), located approximately 1.46 miles northwest of the Project Site at 160 North Main Street.

As stated above, the Project is not expected to result in a substantial increase in population compared to existing conditions. Thus, the Project is not expected to result in an additional demand for library services. Therefore, less than significant impacts would occur.

Mitigation Measures: No mitigation measures are required.

---

59 City of Milpitas, "Facilities." Available online at: https://www.milpitas.gov/Facilities?clear=False, accessed January 4, 2023.

60 Santa Clara County Library District, "Library Locations." Available online at: https://sccl.bibliocommons.com/locations/?_ga=2.6142516.641854484.1668657211-740783852.1665682817&_gl=1*1jk0cnn*_ga*NzQwNzgzODUyLjE2NjU2ODI4MTc.*_ga_G99DMMNG39*MTY2ODY1NzIxMS43LjEuMTY2ODY1NzI2Ny4wLjAuMA, accessed January 4, 2024.

16. Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

No Impact. As stated in **Section 15**, **Public Services**, the nearest recreational facility to the Project Site is the Parc Metro Clubhouse, located 0.58 miles north of the Project Site. Further, as stated above, the Project would not result in a substantial increase in the City's population and would not increase the use of existing parks and recreational facilities. Accordingly, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The Project would involve the renovation of an existing vacant office building into a preparatory school. While the Project does include the construction of a playfield and gymnasium, the facilities are intended for the use of the private school and are not open to the general public. As stated above, the Project would not increase the use of existing recreational facilities and therefore would not require the construction or expansion of recreational facilities. Therefore, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

17. Transportation and Traffic

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a plan, ordinance or policy addressing the performance of the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?	☐	☐	☒	☐
b. For a transportation project, would the project conflict with or be inconsistent with *CEQA Guidelines* section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase geometric hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Less than Significant Impact.

Pedestrian and Bicycle Facilities

Off-site pedestrian facilities that surround the Project Site are limited to sidewalks located along Great Mall Drive and Great Mall Parkway. All intersections adjacent to the Project Site provide marked crosswalks and curb ramps on most approaches. Additionally, Great Mall Parkway is identified by the City of Milpitas as an existing Class II Bike Lane and as an existing trailway that is prioritized for improvement.[61]

Project construction would not disturb the surrounding pedestrian facilities as all associated construction activities/staging equipment would occur on-site. With respect to operations, the Project Site includes direct pedestrian connections to the nearby Milpitas BART Station (see **Appendix D, Transportation Impact Analysis)**. The Project would install pedestrian/bike gates that would provide access for students walking along all adjacent roadways. Pedestrians and bicyclists travelling to/from the Milpitas BART station would

61 City of Milpitas, *City of Milpitas Bicycle/Pedestrian & Trails Plan,* Adopted May 2022. Available online at: https://www.milpitas.gov/DocumentCenter/View/4954/Trail-Pedestrian-and-Bicycle-Master-Plan---Adopted-May-2022-PDF?bidId=, accessed January 5, 2024.

maintain access to the Project Site. As such, the Project would not remove any pedestrian facilities, nor would it conflict with the City of Milpitas *Trail, Pedestrian and Bicycle Master Plan*.

According to **Appendix D**, the volume of cyclists generated by the Project would not exceed the carrying capacity of the existing bike facilities surrounding the site, nor would Project implementation require additional bicycle facilities. Rather, the Project would provide bicycle parking spaces on-site for students and staff. Thus, the Project would not conflict with the City's *Trail, Pedestrian and Bicycle Master Plan*.

Transit Systems

The Project Site is surrounded by several stops for light rail and public transit lines provided by the Valley Transportation Authority (VTA), Alameda-Contra Costa Transit District (AC,) and the San Francisco Bay Area Rapid Transit District (BART) (see **Appendix D**).[62] The closest VTA bus stop is located approximately 275 feet southwest from the Project Site along Great Mall Parkway and 0.20 miles northwest at the intersection of Great Mall Parkway and McCandless Drive. Additionally, the Project Site is located less than 0.50 miles from the nearest major transit stop. The closest major transit stops include Milpitas BART Station and the VTA Great Mall/ Main Station. Thus, the Project Site is located within a Transit-Oriented Development (TOD) area.[63]

The Project would introduce new students and staff to the Project area. Thus, the Project would generate additional transit trips in the Project area. However, according to **Appendix D**, the volume of transit trips generated by the Project is not expected to exceed the carrying capacity of the existing transit services to the site. The Project, by itself, would not require additional transit service to the area or improvements to existing transit service frequencies. Thus, the Project would not require conflict with existing or proposed transit projects or policies identified by the VTA.

In conclusion, the Project would not conflict with the plans or policies addressing the circulation system of the transit, roadway, bicycle and pedestrian facilities. Less than significant impacts would occur.

Mitigation Measures: No mitigation measures are required.

---

62 Valley Transportation Authority, "Routes." Available online at: https://www.vta.org/go/routes, accessed January 5, 2024.

63 A Transit-Oriented Development is defined by U.S. Department of Transportation as "projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact"

b) Conflict or be inconsistent with *CEQA Guidelines* section 15064.3, subdivision (b)?

Less than Significant Impact.

CEQA Guidelines Section 15064.3(b) provides considerations for evaluating a project's transportation impacts. Land Use Projects (b)(1) are evaluated through vehicle miles traveled (VMT). Generally, projects within one-half miles of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact.[64] Projects that decrease VMT in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.

On May 18, 2021, the City of Milpitas adopted a local transportation policy analysis for VMT, the *City of Milpitas Transportation Analysis* (dated March 2022), to comply with State law and provide established and consistent criteria for analyzing transportation impacts of development projects and long-range plans. The transportation policy is intended for evaluating potential transportation impacts of new developments to comply with the California Environmental Quality Act (CEQA). The City has established thresholds of significance for non-residential Projects that are in accordance with the Office of Planning and Research (OPR). According to the *City of Milpitas Transportation Analysis,* a project shall be presumed to have a less-than-significant transportation impact of they meet any of the following screening criteria:

- Small Project Screening: Projects generating 110 daily trips or less. Examples: Single-family residential development of 12 units or fewer, multi-family residential development of 20 units or fewer, and office developments of 10,000 square feet or less.
- Retail projects that are local serving defined as 100ksf or less;
- Local serving public projects such as fire stations, neighborhood parks, libraries, and community centers;
- Transit Supportive Project transit screening: All land-use projects located within one half mile of a major transit stop, or a stop along a high-quality transit corridor, pursuant to State definitions for such facilities and meet the following criteria;
  - For Office/R&D projects, a minimum floor area ratio of 0.75

64 California Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, 2018. Available online at: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf, accessed February 2, 2024.

  - For Residential projects, a minimum density of 35 units/acre (40 units/acre in the Serra Center and 50 units/acre in the Milpitas Metro Specific Plan area);

  - No excess parking: the project does not include more parking for use by residents, customers, or employees of the project than required by the Municipal Code;

  - No loss of affordable dwelling units: the project does not replace affordable residential units with a smaller number of affordable units, and any replacement units are at the same level of affordability; and

- Projects with restricted affordable housing.

Project Screening

Appendix D determined that the Project could potentially be screened out of the VMT Analysis, as the proposed school use would qualify the Project to be screened out of VMT Analysis under the following screening criteria identified in the *City of Milpitas Transportation Analysis*:

- **Local Serving Project:** As stated above, the City of Milpitas *Transportation Analysis Policy Guidelines* (March 2022) presumes that local serving public projects would have a have a less-than-significant transportation impact. The Governor's Office of Planning and Research (OPR) *Technical Advisory* (December 2018) states that "By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact." **Appendix D** states that school uses are similar to retail uses, in that, the more schools that are located within in a given area, the shorter the student trips between the school and other complementary land uses (such as employment or residential uses).

- **Prior Approvals:** The Project Site is located within the MMSP planning area. The Project Site is designated as BPRD-R and educational uses are listed as an acceptable use in BPRD-R designated areas under the MMSP. Thus, the proposed educational use was contemplated as a potential development on-site under the MMSP. According to **Appendix D**, CEQA impacts related to traffic for projects that are consistent with the MMSP have been analyzed in the Supplemental Environmental Impact Report (EIR) for the MMSP. As such, the Project may qualify for a statutory exemption under CEQA.

Therefore, given the City's screening criteria, prior finding regarding private school projects, and that the use for the site is already cleared environmentally, the impacts of the project on VMT are considered less than significant.

VMT Analysis

The Project would implement a new school with a maximum student enrollment of 500 students and 75 employees. The VMT Analysis (**Appendix D**) determined that implementation of the Project would decrease the VMT per employee (VMT/employee) from 2,635 VMT/employee to 1,163 VMT/employee.

As a new secondary school for 6th through 12th graders, the Project would be the only Stratford secondary school for three existing lower division Stratford preparatory schools located within a three-mile distance from the Project Site. According to **Appendix D**, the Project would provide an alternate location for Stratford school students to continue their education without traveling to a more distant location, thus reducing VMT per capita from existing conditions. Thus, the Project's overall impact on VMT would be less than significant.

Mitigation Measures: No mitigation measures are required.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. The Project would not include any on-site or off-site roadway improvements. The majority of the existing on-site circulation would be maintained with implementation of the Project. The Project would utilize the two existing driveways off of Great Mall Drive and Falcon Drive. Visitors would use the existing driveway off of Great Mall Drive as the primary vehicular entry to the Project Site. As illustrated in **Figure 2.0-5**, upon entering the school grounds, visitors may either turn right to park within the proposed 21 parking spaces located at the northwestern corner of the Project Site or turn left towards the remaining on-site parking spaces or towards the proposed drop-off and pick up-zone for students along the northern frontage of the school. As depicted, vehicles would then continue through the proposed egress route and exit the Project Site through the security gate along the southern perimeter of the site to the parking lot of the existing adjacent school, or through the existing driveway along Falcon Drive. The Project would be required to comply with all on-site circulation site access requirements imposed by the City and the Milpitas Fire Department (MFD). As such, Project plans would be subject to review by the City and the MFD. Upon approval, the Project would not include any geometric design features or incompatible uses that would substantially increase hazards. Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d) Result in inadequate emergency access?

Less than Significant Impact. Construction activities would remain on-site. The Project would utilize the existing driveways on-site for emergency access. The Project would incorporate all applicable design and safety standards and regulations outlined in Chapter 33 of the 2022 California Building Code, and Chapter 11 (Construction Requirements for Existing Buildings) of the California Fire Code. Furthermore, the Project would be subject to site plan review by the City and MFD to ensure that on-site emergency access points are sufficient. Upon site plan approval, and by adhering to applicable state requirements, impacts regarding emergency access would be less than significant.

Mitigation Measures: No mitigation measures are required.

18. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Would the project:

Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resource Code section 5020.1(k)?

No Impact. Impacts related to historical resources are evaluated in **Section 5, Cultural Resources**. As discussed, there are no buildings or structures within the Project Site that are eligible to be listed on the CRHR or the NRHP. The existing building on-site was constructed in 2002. As such, no impacts would occur.

Mitigation Measures: No mitigation measures are required.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less than Significant Impact with Mitigation Incorporated. As discussed in **Appendix B**, **Cultural Resources Documentation**, results of the Sacred Lands File (SLF) search report from the Native American Heritage Commission (NAHC) for the Project Site were negative.

In compliance with AB 52, the City will distribute letters notifying each tribe that may have knowledge of cultural resources within the Project Area in coordination with the circulation of this MND.

Ground disturbing activities associated with the Project could result in the discovery of previously undiscovered cultural resources. This includes potential discovery of tribal cultural resources. In the event Native American resources are discovered, the City would consult with the Native American monitor and affected tribe(s). Additionally, as stated in **Section 5, Cultural Resources,** in the event that human remains are encountered, **Mitigation Measure CUL-1** would ensure that work in the immediate area of a potential archaeological find is halted until an archaeologist evaluates the find and determines appropriate subsequent procedures. With implementation of **Mitigation Measure CUL-1**, impacts to resources that are applicable under Public Resources Code Section 5024.1 would be reduced to less than significant levels.

Mitigation Measures: See **Mitigation Measure CUL-1**.

19. Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact.

Water

The City provides water services to the Project Site and receives water supplies from the San Francisco Public Utilities Commission (SFPUC) and Valley Water (formerly Santa Clara Valley Water District). The SFPUC is a regional wholesale water supplier that supplies predominantly snowmelt from the Sierra

Nevada, delivered through the Hetch Hetchy aqueducts.[65] Valley Water is a countywide wholesale water and groundwater management agency, relies on local retailers (municipalities and private companies) to deliver water to homes and businesses throughout the county, including the City of Milpitas.[66]

Potable water is currently being conveyed to the Project Site with the existing underground waterlines that connect to a 12-inch water main along Great Mall Drive. The Project would continue to use the existing water lines on-site to receive potable water for the landscaping, restrooms, and kitchens. The proposed gymnasium would not include uses that need potable water. The Project Site is designated in the City's General Plan as Milpitas Metro Specific Plan (MMSP), and in the MMSP, the Project Site is designated as Business Park Research & Development, Limited Residential (BPDR-R), which supports and allows educational uses. Therefore, the expected development intensity of the Project has been accounted for in the City's long-range planning documents. As such, the Project would not require new or relocated or expanded water facilities.

Wastewater

The Project would include the construction of new bathrooms within the existing building, which would generate additional demand for wastewater treatment. No bathrooms are being proposed within the new gymnasium. Wastewater produced by the Project would be treated at the San Jose-Santa Clara Regional Wastewater Facility (RWF), located 1.23 miles southwest of the Project Site in the City of San Jose. The proposed school would construct a new 6-inch sewer lines to connect to the City's 8-inch main and new 6-inch and 8-inch storm drains will collect water and then route to a detention basin, which will then drain into a private storm drain system along Great Mall Drive. A new Recycled Water system will need to be constructed in order to provide irrigation to the landscape areas. A connection to the existing 8-inch Recycled Water Main on Falcon Drive will be established.

The RWF has a total contracted peak flow capacity of 14.25 million gallons per day (mgd).[67] The Project is anticipated to generate approximately 570 gallons per day.[68,69] The anticipated wastewater generated by

---

65 City of Milpitas, *2020 Urban Water Management Plan*, 2021. Available online at: https://www.milpitas.gov/_pdfs/Milpitas_2020_%20UWMP_FINAL.pdf, accessed January 11, 2024.

66 Valley Water, "Find My Water Retailer," Available online at: https://www.valleywater.org/find-my-retailer, accessed January 10, 2024.

67 City of Milpitas, *2020 Urban Water Management Plan*, 2021. Available online at: https://www.milpitas.gov/_pdfs/Milpitas_2020_%20UWMP_FINAL.pdf, accessed January 11, 2024.

68 City of Milpitas, *Sewer Master Plan Update*, 2009. Available online: https://www.milpitas.gov/_pdfs/eng_mp_sewer.pdf, accessed January 11, 2024.

69 The estimated wastewater generation is based on the land use designation for schools under the Sewer Master Plan Update (Public Facilities) and the acreage of the Project Site (See 7-6: Calibrated UF Factors of the Sewer Master Plan Update).

the Project would represent less than one percent of the City's contracted peak flow for the RWF. As such, the existing wastewater treatment capacity is anticipated to be sufficient to accommodate the Project. The Project is consistent with the Project Site's land use designation under the MMSP and therefore its development intensity and its wastewater generation have already been accounted for in the City's long range planning documents. Thus, the Project would not require the relocation or construction of new or expanded wastewater treatment facilities and impacts related to wastewater conveyance would be less than significant.

Stormwater

Stormwater runoff from the Project Site is currently conveyed off-site by the City's stormwater drainage system. Compared to existing conditions, the Project would increase the amount of impervious surfaces at the Project Site. However, the Project would implement a new stormwater system to offset the increase in stormwater resulting from the new gymnasium building. The Project would install new storm drain lines that would drain runoff into a new planter area and would act as a bioswale for treatment. The Project would also adhere to local regulations to ensure that stormwater pollution from the Project would be minimized. The proposed stormwater design features and adherence to applicable requirements would reduce the Project's impacts to the City's stormwater system to less than significant levels.

Electricity, Natural Gas, or Telecommunications

According to the MMSP, Pacific Gas & Electric (PG&E) provides electric services to properties within the planning area, including the Project Site. The Project would utilize the existing electricity, natural gas, and telecommunication lines and services at the Project Site. Payment of standard utility connection fees and ongoing user fees to PG&E would be required to ensure these utility services would be able to accommodate the proposed gymnasium. Payment of these standard fees would ensure that Project impacts to dry utility services would be less than significant.

Mitigation Measures: No mitigation measures are required.

b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less than Significant Impact. Valley Water provides treated water from its Penitencia and Santa Teresa treatment plant via its Milpitas Pipeline which terminates in the City. Although the City's purchases are currently limited to surface water largely purchased by Valley Water from the State Water Project and Central Valley Project, Valley Water's overall water supply comes from a variety of sources. Nearly half is from local groundwater aquifers, and more than half is imported from the Sierra Nevada through pumping

stations in the Sacramento-San Joaquin River Delta. Both groundwater and imported water are sold to retailers.

According to the City's 2020 Urban Water Management Plan (UWMP), the total storage of both the Penitencia and Santa Teresa treatment plant combined is 170,000 acre-feet (AF). Further, the City is projected to have a water demand and supply of 4,917-acre feet per year (AFY) by the year 2045 during normal, dry, and multiple dry years. According to **Appendix A, Air Quality and Greenhouse Gas Data**, the Project would generate a water demand of approximately 2,648,705 gallons per year or 7,256 gallons per day (gpd) (or 8.12 AFY). Thus, the Project would represent less than one percent of both the City's water demand and supply, as well as the treatment capacity of both the Penitencia and Santa Teresa treatment plant. As such, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. As discussed above, the Project would not require the relocation or construction of new or expanded wastewater treatment facilities. The Project involves the renovation of an existing office building into a new preparatory school and the construction of a new gymnasium and turf playfield. As stated, the Project would result in an increase in demand for wastewater treatment compared to existing conditions. However, the Project is not anticipated to be a substantial source of wastewater. Based on available data, it is anticipated that the RWF has adequate capacity to serve the Project's projected demand for wastewater treatment. Therefore, the Project's impacts to wastewater treatment would be less than significant.

Mitigation Measures: No mitigation measures are required.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less than Significant Impact. Approximately 75 percent of total solid waste generated within the City is disposed at the Newby Island Sanitary Landfill and Monterey Peninsula Landfill.[70] The Newby Island Landfill permits 4,000 tons of solid waste per day and a remaining capacity of 16,400,000 tons of solid

70 CalRecycle, "Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility." Available online at: https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility. Accessed January 11, 2024.

waste.[71] The Monterey Peninsula Landfill permits 3,500 tons of solid waste per day and a remaining capacity of 48,560,000 tons of solid waste.

Construction activities associated with the Project would generate approximately 221. 5 tons of debris, 153.5 tons of which would be recycled. However, the amount of waste generated by the Project would not exceed the amount of waste permitted or the capacities of the Newby Island Sanitary Landfill and Monterey Peninsula Landfill. Additionally, solid waste generation from the Project's construction activities would be temporary and would cease upon completion of the Project. The Project would generate approximately 45.5 tons of waste per year (or 0.12 ton per day). Accordingly, the Project would represent less than one percent of the daily permitted and remaining capacities for solid waste for both landfills. Therefore, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. Less than significant impacts would occur.

Mitigation Measures: No mitigation measures are required.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact. As stated above, the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure. Furthermore, the Project would demonstrate compliance with the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939), which requires all California cities to "reduce, recycle, and re-use solid waste generated in the State to the maximum extent feasible." AB 939 requires that at least 50 percent of waste produced is recycled, reduced, or composted. The Project would also comply with the 2022 CALGreen Code, which includes design and construction measures that help reduce construction-related waste through material conservation and other construction-related efficiency measures. Thus, less than significant impacts would occur.

Mitigation Measures: No mitigation measures are required.

71 CalRecycle, "SWIS Facility/Site Activity Details- Newby Island Sanitary Landfill." Available online at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1362?siteID=3388, accessed January 11, 2024.

20. Wildfire

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The City's Emergency Operations Plan (EOP) details the City's incident management organization, compliance with relevant legal statutes, other relevant guidelines, whole community engagement, continuity of government focus, and critical components of the incident management structure in the event of a city-wide emergency or disaster.[72] The Project Site is located within a predominately urbanized and developed area of the City. The Project does not propose any off-site improvements, and all construction activities, staging, and equipment would occur on-site. Additionally, the Project Site plans would be reviewed by the Milpitas Fire Department prior to approval. Thus, the Project would not interfere with the City's EOP, and impacts would therefore be less than significant.

72 City of Milpitas, *Emergency Operations Plan of Milpitas*. August 2021. Available online at: https://www.milpitas.gov/DocumentCenter/View/1406/City-of-Milpitas-Emergency-Operations-Plan-PDF, accessed January 11, 2024.

Mitigation Measures: No mitigation measures are required.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

No Impact. Wildfires have the potential to occur not only in fire-prone undeveloped areas, but also in developed areas where existing transmission lines, lightning strikes, lawn equipment operated over dry grass, fireworks, and even arson may ignite a wildfire. Wildfires pose a significant public health risk due to their air quality impacts, particularly with regard to smoke and particulate matter exposure. This risk persists even after a wildfire is extinguished because particulate matter from fire ash can be picked up by winds.

The Project Site is not located within a Very High Fire Hazard Zone (VHFHZ), nor does the Project Site contain vegetation that could contribute to the uncontrolled spread of wildfire.[73] The nearest VHFHZ includes the open hillsides of Milpitas, located more than ten miles to the east of the Project Site.[74] Therefore, given the urbanized location of the Project Site, the Project would not exacerbate wildfire risks and would therefore result in no impact.

Mitigation Measures: No mitigation measures are required.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project Site is urbanized and does not include wildlands or high fire terrain. The Project Site is surrounded by existing structures and infrastructure including roadways and interstate highways and would not require the installation or maintenance of roads, fuel breaks, emergency water or other sources that could exacerbate fire risk. Due to the urbanized nature of the Project Site and surrounding area, it is unlikely any fire would spread and would therefore result in no impact.

Mitigation Measures: No mitigation measures are required.

---

73 County of Santa Clara, "Wildland Urban Interface." Adopted February 24, 2009. Available online at: https://stgenpln.blob.core.windows.net/document/WUIFA_Adopted_Map.pdf. Accessed December 8, 2023.

74 CalFire, "FHSZ Viewer." Available online at: https://egis.fire.ca.gov/FHSZ/, accessed on December 8, 2023.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. In Northern California, intense rainfall may occur during the winter months, creating natural flooding events when the ground is saturated and water levels are high. This has the potential for flooding issues, and fire hazards may exacerbate such flooding and debris flows along waterways. Since debris flows may occur quickly and without warning, such flows can damage structures, block drainage or even sweep away vegetation resulting in tenuous post-fire slope stability. Fast moving debris flows can be one of the most dangerous post-fire hazards. The Project Site is generally flat and urbanized, is not in an area of wildfire risk, and would not be subject to any post fire slope instability or landslides. Therefore, there would be no impact.

Mitigation Measures: No mitigation measures are required.

21. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact with Mitigation Incorporated. As discussed in **Section 3, Air Quality**, the Project will not exceed regional emission thresholds. Furthermore, consistent with BAAQMD requirements, the Project would implement **Mitigation Measure AQ-1** to ensure impacts remain less than significant. As discussed in **Section 8, Greenhouse Gas Emissions**, the Project would not generate greenhouse gas emissions that would result in a significant impact on the environment, nor conflict with an applicable plan, policy, or regulation for reducing GHG emissions. Implementation of **Mitigation Measure GHG-1** would demonstrate the Project's compliance with the *Milpitas 2022 CAP Update;* and ensure impacts are less than significant.

As discussed in **Section 4**, **Biological Resources**, the Project could potentially disturb and modify critical habitats that may be present on-site for special-status bird species. As such, implementation of **Mitigation Measure BIO-1** would ensure that the impacts to the critical habitat of special-status bird species would be reduced to less than significant.

As discussed in **Section 5**, **Cultural Resources**, **Section 7**, **Geology and Soils, and Section 18, Tribal Cultural Resources**, ground disturbing activities associated with the Project may potentially uncover cultural, archaeological, or paleontological resources. As such, implementation of **Mitigation Measures CUL-1** and **GEO-1** would reduce these potential impacts to less than significant levels.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than Significant Impact with Mitigation Incorporated. The Project generally would not contribute to potentially cumulatively considerable impacts. As indicated in the above analysis, with implementation of the required mitigation measures, the Project would not result in any unmitigated significant adverse impacts and/or cumulatively considerable impacts. Specifically, **Mitigation Measures AQ-1, BIO-1, CUL-1, GHG-1, and GEO-1**, would reduce potentially significant impacts to less than significant levels. The Project does not include any unmitigated cumulatively considerable impacts when considered in connection with the effects of past, present and probable future projects. No further analysis is necessary.

c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact with Mitigation Incorporated. As indicated in the above analysis, with implementation of the required mitigation measures, the Project would not result in any unmitigated significant adverse impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings.

D. REFERENCES

California Air Resources Board. "Low Carbon Fuel Standard." Available online at: https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/about, accessed December 11, 2023.

California Department of Conservation. "California Important Farmland Finder." Available online at: https://maps.conservation.ca.gov/dlrp/ciff/, Accessed December 8, 2023.

California Department of Conservation. "Earthquake Zones of Required Investigation." Available online at: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed December 18, 2023.

California Department of Conservation. "Landslide Inventory (Beta)." Available online at: https://maps.conservation.ca.gov/cgs/lsi/, accessed December 13, 2023.

California Department of Conservation. "Mines Online." Available online at: https://maps.conservation.ca.gov/mol/index.html, accessed December 15, 2023.

California Department of Conservation. "Los Angeles County Tsunami Hazard Areas." Available online at: https://www.conservation.ca.gov/cgs/tsunami/maps/los-angeles. Accessed January 2, 2024.

California Department of Conservation. *The Williamson Act Status Report*. 2022. Available online at: https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2022%20WA%20Status%20Report.pdf, accessed December 8, 2023.

California Department of Finance, Demographic Research Unit. *E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2021-2022, with 2020 Benchmark*. May 2022.

California Department of Forestry and Fire Prevention (CAL FIRE). "Fire Hazard Severity Zone Viewer." Available online at: https://egis.fire.ca.gov/FHSZ/, accessed January 2, 2024.

California Department of Transportation (Caltrans). "California State Scenic Highways." Available online at: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa, accessed December 12, 2023.

California Department of Conservation. *Update of Mineral Land Classification: Aggregate Materials in the South San Francisco Bay Production-Consumption Region*. 1996.

California Environmental Protection Agency. "Cortese List Data Resources." Available online at: https://calepa.ca.gov/sitecleanup/corteselist/, accessed January 2, 2024.

California Office of Planning and Research. Technical Advisory on Evaluating Transportation Impacts in CEQA. 2018. Available online at: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

California State Geoportal. Liquefaction Zones. Available online at: https://gis.data.ca.gov/datasets/b70a766a60ad4c0688babdd47497dbad/about?layer=0, accessed December 13, 2023.

CalFire, "FHSZ Viewer." Available online at: https://egis.fire.ca.gov/FHSZ/, accessed on December 8, 2023.

CalRecycle. "Jurisdiction Disposal and Alternative Daily Cover (ADC) Tons by Facility." Available online at: https://www2.calrecycle.ca.gov/LGCentral/DisposalReporting/Destination/DisposalByFacility. Accessed January 11, 2024.

CalRecycle. SWIS Facility/Site Activity Details- Newby Island Sanitary Landfill. Available online at: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1362?siteID=3388, accessed January 11, 2024.

City of Milpitas. *City of Milpitas Bicycle/Pedestrian & Trails Plan*. May 2022. Available online at: https://www.milpitas.gov/DocumentCenter/View/4954/Trail-Pedestrian-and-Bicycle-Master-Plan---Adopted-May-2022-PDF?bidId=, accessed January 5, 2024.

City of Milpitas. *City of Milpitas General Plan 2040*. March 2021. Available online at: https://static1.squarespace.com/static/57277b461d07c02f9c2f5c2c/t/60906e6349539311604cae70/1620078198914/Milpitas+General+Plan_Final_online+version.pdf, accessed January 5,2024.

City of Milpitas. *City of Milpitas General Plan Environment Impact Report*. November 2020. Available online at: https://www.milpitas.gov/DocumentCenter/View/1344/Draft-EIR-final-edits-PDF?bidId=, accessed December 12, 2023.

City of Milpitas. *City of Milpitas Metro Specific Plan*. February 2023. Available online at: https://www.milpitas.gov/DocumentCenter/View/3428/2023-Metro-Specific-Plan-PDF?bidId=, accessed January 5,2024.

City of Milpitas. *Climate Action Plan.* 2013. Available online at: http://www.ci.milpitas.ca.gov/_pdfs/Climate_ActionPlan.pdf. Accessed December 11, 2023.

City of Milpitas. *Emergency Operations Plan of Milpitas.* August 2021. Available online at: https://www.milpitas.gov/DocumentCenter/View/1406/City-of-Milpitas-Emergency-Operations-Plan-PDF, accessed January 11, 2024

City of Milpitas. "Fire." Available online at: https://www.milpitas.gov/milpitas/departments/fire/, accessed January 11, 2024.

City of Milpitas. "Facilities." Available online at: https://www.milpitas.gov/Facilities?clear=False, accessed January 4, 2023.

City of Milpitas, *Sewer Master Plan Update*. 2009. Available online: https://www.milpitas.gov/_pdfs/eng_mp_sewer.pdf, accessed January 11, 2024.

City of Milpitas. *2020 Urban Water Management Plan*. 2021. Available online at: https://www.milpitas.gov/_pdfs/Milpitas_2020_%20UWMP_FINAL.pdf, accessed January 11, 2024.

County of Santa Clara, "Wildland Urban Interface." Adopted February 24, 2009. Available online at: https://stgenpln.blob.core.windows.net/document/WUIFA_Adopted_Map.pdf. Accessed December 8, 2023.

Federal Emergency Management Agency. "Flood Map Service Center- National Flood Hazard Layer FIRMette." Available online at: https://msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/msc printb_gpserver/j3cc6c97f749e4c8d8fab0cff536ae375/scratch/FIRMETTE_938d2d6a-be69-4901-953f-24b964930a42.pdf, accessed January 5, 2024.

Department of Toxic Substances Control. "Envirostor." Available online at: https://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST. Accessed December 13, 2023.

Michigan Tech University. "Earthquake Magnitude Scale." Available online at: https://www.mtu.edu/geo/community/seismology/learn/earthquake-measure/magnitude/, accessed on December 13, 2023.

Office of Historic Preservation. "Built Environment Resource Directory (BERD)." Available online: https://ohp.parks.ca.gov/?page_id=30338, accessed January 23, 2024.

Santa Clara County Library District. "Library Locations." Available online at: https://sccl.bibliocommons.com/locations/?_ga=2.6142516.641854484.1668657211-740783852.1665682817&_gl=1*1jk0cnn*_ga*NzQwNzgzODUyLjE2NjU2ODI4MTc.*_ga_G99DMMNG39*MTY2ODY1NzIxMS43LjEuMTY2ODY1NzI2Ny4wLjAuMA, accessed January 4, 2024.

Santa Clara Valley Habitat Agency. *Final Santa Clara Valley Habitat Plan*, Figure 1-2, Santa Clara Valley Habitat Plan Study Area and Permit Area. August 2012. Available online at: https://www.scv-habitatagency.org/178/Santa-Clara-Valley-Habitat-Plan, accessed December 12, 2023.

State Water Resources Control Board. "Geotracker." Available online at: https://geotracker.waterboards.ca.gov/. Accessed December 13, 2023.

United States Department of Agriculture. "Web Soil Survey." Available online at: https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx. Accessed December 13, 2023.

United States Geological Survey. "Quaternary Fault and Fold Database of the United States." Available online at: https://www.usgs.gov/programs/earthquake-hazards/faults. Accessed on December 13, 2023.

U.S. Geological Survey. "Areas of Land Subsidence in California." Available online at: https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html, accessed December 13, 2023.

United States Fish and Wildlife, "National Wetlands Inventory." Available online at: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/. Accessed December 12, 2023.

Valley Transportation Authority. "Routes." Available online at: https://www.vta.org/go/routes, accessed January 5, 2024.

Valley Water. "Find My Water Retailer." Available online at: https://www.valleywater.org/find-my-retailer, accessed January 10, 2024.

Walter B. Windus PE, Aviation Consultant. *Norman Y. Mineta San Jose International Airport Comprehensive Land Use Plan, Figure 8 "Airport Influence Area.* November 16, 2016.

Yerba Buena Chapter-CNPS. "Northern Coastal Salt Marsh." Available online at: http://cnps-yerbabuena.org/northern-coastal-salt-marsh/. Accessed January 8, 2024.

4.0 LIST OF PREPARERS

Persons directly involved in the review and preparation of this study include:

City of Milpitas Planning Department (Lead Agency)

Avery Stark, Acting Senior Planner
455 E. Calaveras Boulevard
Milpitas, CA 95035

Project Applicant

Stratford School
12930 Saratoga Avenue, Suite A-2
Saratoga, CA 95070

Architectural Consultant

Inhabit Design
255 S King Street, Suite 800
Seattle, WA 98104

Environmental Consultant

Impact Sciences, Inc.
811 W. 7th Street, Suite 200
Los Angeles, CA 90017

Contributors:

Jessica Kirchner, AICP, Associate Principal
Brett Pomeroy, Technical Director
Margaret Lin, Senior Project Manager
Eleni Getachew, ENV SP, Deputy Project Manager / Planner
Annalie Sarrieddine, Planner
Amber Williams, Air Quality and Greenhouse Technical Specialist
Kara Yates Hines, Publications Manager

Transportation Consultant

Hexagon Transportation Consultants, Inc.
Brett Walinski, Associate
5776 Stoneridge Mall Road, Suite 175
Pleasanton, CA 94588

APPENDIX A

Air Quality and Greenhouse Gas Data

Stratford Preparatory School - School Building Custom Report

Table of Contents

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Stratford Preparatory School - School Building
Operational Year	2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.00
Precipitation (days)	31.0
Location	37.411455, -121.895387
County	Santa Clara
City	Milpitas
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1903
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.21

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
High School	500	Student	1.52	51,740	0.00	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.80	8.43	5.84	61.4	0.14	0.14	12.9	13.0	0.13	3.26	3.39	53.4	14,987	15,040	6.00	0.56	55.7	15,412
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7.10	7.73	6.73	54.9	0.13	0.13	12.9	13.0	0.13	3.26	3.39	53.4	14,123	14,177	6.07	0.61	1.64	14,512
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	5.43	6.21	4.89	41.0	0.10	0.11	9.39	9.50	0.11	2.38	2.49	53.4	10,815	10,868	5.88	0.44	18.0	11,165
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.99	1.13	0.89	7.48	0.02	0.02	1.71	1.73	0.02	0.43	0.45	8.84	1,790	1,799	0.97	0.07	2.99	1,848

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Mobile	7.34	6.77	5.25	58.7	0.14	0.09	12.9	13.0	0.08	3.26	3.35	—	14,160	14,160	0.57	0.54	55.5	14,392
Area	0.40	1.62	0.02	2.25	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.25	9.25	< 0.005	< 0.005	—	9.29
Energy	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	809	809	0.08	< 0.005	—	812
Water	—	—	—	—	—	—	—	—	—	—	—	4.22	7.97	12.2	0.43	0.01	—	26.2
Waste	—	—	—	—	—	—	—	—	—	—	—	49.2	0.00	49.2	4.92	0.00	—	172
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.20	0.20
Total	7.80	8.43	5.84	61.4	0.14	0.14	12.9	13.0	0.13	3.26	3.39	53.4	14,987	15,040	6.00	0.56	55.7	15,412
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	7.04	6.45	6.16	54.4	0.13	0.09	12.9	13.0	0.08	3.26	3.35	—	13,306	13,306	0.64	0.60	1.44	13,502
Area	—	1.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	809	809	0.08	< 0.005	—	812
Water	—	—	—	—	—	—	—	—	—	—	—	4.22	7.97	12.2	0.43	0.01	—	26.2
Waste	—	—	—	—	—	—	—	—	—	—	—	49.2	0.00	49.2	4.92	0.00	—	172
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.20	0.20
Total	7.10	7.73	6.73	54.9	0.13	0.13	12.9	13.0	0.13	3.26	3.39	53.4	14,123	14,177	6.07	0.61	1.64	14,512
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5.17	4.74	4.31	39.4	0.10	0.07	9.39	9.46	0.06	2.38	2.44	—	9,993	9,993	0.45	0.43	17.8	10,150
Area	0.20	1.44	0.01	1.11	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.56	4.56	< 0.005	< 0.005	—	4.58
Energy	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	809	809	0.08	< 0.005	—	812
Water	—	—	—	—	—	—	—	—	—	—	—	4.22	7.97	12.2	0.43	0.01	—	26.2
Waste	—	—	—	—	—	—	—	—	—	—	—	49.2	0.00	49.2	4.92	0.00	—	172
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.20	0.20
Total	5.43	6.21	4.89	41.0	0.10	0.11	9.39	9.50	0.11	2.38	2.49	53.4	10,815	10,868	5.88	0.44	18.0	11,165
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.94	0.87	0.79	7.19	0.02	0.01	1.71	1.73	0.01	0.43	0.45	—	1,654	1,654	0.07	0.07	2.95	1,680
Area	0.04	0.26	< 0.005	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.76	0.76	< 0.005	< 0.005	—	0.76

Energy	0.01	0.01	0.10	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	134	134	0.01	< 0.005	—	134
Water	—	—	—	—	—	—	—	—	—	—	—	0.70	1.32	2.02	0.07	< 0.005	—	4.33
Waste	—	—	—	—	—	—	—	—	—	—	—	8.14	0.00	8.14	0.81	0.00	—	28.5
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	0.99	1.13	0.89	7.48	0.02	0.02	1.71	1.73	0.02	0.43	0.45	8.84	1,790	1,799	0.97	0.07	2.99	1,848

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	7.34	6.77	5.25	58.7	0.14	0.09	12.9	13.0	0.08	3.26	3.35	—	14,160	14,160	0.57	0.54	55.5	14,392
Total	7.34	6.77	5.25	58.7	0.14	0.09	12.9	13.0	0.08	3.26	3.35	—	14,160	14,160	0.57	0.54	55.5	14,392
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	7.04	6.45	6.16	54.4	0.13	0.09	12.9	13.0	0.08	3.26	3.35	—	13,306	13,306	0.64	0.60	1.44	13,502
Total	7.04	6.45	6.16	54.4	0.13	0.09	12.9	13.0	0.08	3.26	3.35	—	13,306	13,306	0.64	0.60	1.44	13,502
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.94	0.87	0.79	7.19	0.02	0.01	1.71	1.73	0.01	0.43	0.45	—	1,654	1,654	0.07	0.07	2.95	1,680
Total	0.94	0.87	0.79	7.19	0.02	0.01	1.71	1.73	0.01	0.43	0.45	—	1,654	1,654	0.07	0.07	2.95	1,680

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	128	128	0.02	< 0.005	—	130
Total	—	—	—	—	—	—	—	—	—	—	—	—	128	128	0.02	< 0.005	—	130
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	128	128	0.02	< 0.005	—	130
Total	—	—	—	—	—	—	—	—	—	—	—	—	128	128	0.02	< 0.005	—	130
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	21.2	21.2	< 0.005	< 0.005	—	21.5
Total	—	—	—	—	—	—	—	—	—	—	—	—	21.2	21.2	< 0.005	< 0.005	—	21.5

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

High School	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	681	681	0.06	< 0.005	—	683
Total	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	681	681	0.06	< 0.005	—	683
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	681	681	0.06	< 0.005	—	683
Total	0.06	0.03	0.57	0.48	< 0.005	0.04	—	0.04	0.04	—	0.04	—	681	681	0.06	< 0.005	—	683
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.01	0.01	0.10	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	113
Total	0.01	0.01	0.10	0.09	< 0.005	0.01	—	0.01	0.01	—	0.01	—	113	113	0.01	< 0.005	—	113

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	1.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.40	0.37	0.02	2.25	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.25	9.25	< 0.005	< 0.005	—	9.29
Total	0.40	1.62	0.02	2.25	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	9.25	9.25	< 0.005	< 0.005	—	9.29

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	1.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.15	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	1.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.20	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.04	0.03	< 0.005	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.76	0.76	< 0.005	< 0.005	—	0.76
Total	0.04	0.26	< 0.005	0.20	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.76	0.76	< 0.005	< 0.005	—	0.76

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	4.22	7.97	12.2	0.43	0.01	—	26.2

Total	—	—	—	—	—	—	—	—	—	—	—	4.22	7.97	12.2	0.43	0.01	—	26.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	4.22	7.97	12.2	0.43	0.01	—	26.2
Total	—	—	—	—	—	—	—	—	—	—	—	4.22	7.97	12.2	0.43	0.01	—	26.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	0.70	1.32	2.02	0.07	< 0.005	—	4.33
Total	—	—	—	—	—	—	—	—	—	—	—	0.70	1.32	2.02	0.07	< 0.005	—	4.33

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	49.2	0.00	49.2	4.92	0.00	—	172
Total	—	—	—	—	—	—	—	—	—	—	—	49.2	0.00	49.2	4.92	0.00	—	172
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	49.2	0.00	49.2	4.92	0.00	—	172
Total	—	—	—	—	—	—	—	—	—	—	—	49.2	0.00	49.2	4.92	0.00	—	172
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

High School	—	—	—	—	—	—	—	—	—	—	—	8.14	0.00	8.14	0.81	0.00	—	28.5
Total	—	—	—	—	—	—	—	—	—	—	—	8.14	0.00	8.14	0.81	0.00	—	28.5

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.20	0.20
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.20	0.20
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.20	0.20
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.20	0.20
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
High School	1,965	290	125	533,943	18,254	2,694	1,161	4,960,064

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	77,610	25,870	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
High School	229,593	204	0.0330	0.0040	2,124,489

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
High School	2,202,480	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
High School	91.3	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
High School	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
High School	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
High School	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
High School	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

8. User Changes to Default Data

Screen	Justification
Land Use	Existing building is 51,740 square feet and will accommodate 500 students.
Operations: Vehicle Data	According to the traffic operations analysis prepared by Hexagon Transportation Consultants, Inc., the Project will generate 1,965 daily trips.

Stratford Preparatory School - Gymnasium Custom Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Stratford Preparatory School - Gymnasium
Construction Start Date	7/1/2024
Operational Year	2025
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.00
Precipitation (days)	31.0
Location	37.411455, -121.895387
County	Santa Clara
City	Milpitas
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1903
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.21

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Health Club	7.88	1000sqft	0.18	7,883	0.00	—	—	—
Parking Lot	8.00	Space	0.07	0.00	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.46	5.20	11.4	14.3	0.02	0.53	2.13	2.67	0.49	1.02	1.51	—	2,481	2,481	0.10	0.08	1.26	2,493
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.68	0.57	5.66	7.12	0.01	0.26	0.04	0.29	0.24	0.01	0.24	—	1,367	1,367	0.06	0.02	0.01	1,373
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.28	0.46	2.26	3.01	0.01	0.10	0.11	0.21	0.09	0.05	0.14	—	566	566	0.02	0.01	0.05	569
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.05	0.08	0.41	0.55	< 0.005	0.02	0.02	0.04	0.02	0.01	0.03	—	93.7	93.7	< 0.005	< 0.005	0.01	94.2

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	1.44	1.21	11.4	11.1	0.02	0.53	2.13	2.67	0.49	1.02	1.51	—	1,779	1,779	0.07	0.08	1.26	1,786
2025	1.46	5.20	10.5	14.3	0.02	0.44	0.19	0.63	0.40	0.04	0.45	—	2,481	2,481	0.10	0.03	0.82	2,493
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.68	0.57	5.66	7.12	0.01	0.26	0.04	0.29	0.24	0.01	0.24	—	1,367	1,367	0.06	0.02	0.01	1,373
2025	0.63	0.53	5.20	7.08	0.01	0.22	0.04	0.25	0.20	0.01	0.21	—	1,366	1,366	0.06	0.02	0.01	1,372
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.28	0.23	2.26	2.70	< 0.005	0.10	0.11	0.21	0.09	0.05	0.14	—	508	508	0.02	0.01	0.05	511
2025	0.28	0.46	2.22	3.01	0.01	0.09	0.02	0.11	0.09	0.01	0.09	—	566	566	0.02	0.01	0.05	569
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2024	0.05	0.04	0.41	0.49	< 0.005	0.02	0.02	0.04	0.02	0.01	0.03	—	84.2	84.2	< 0.005	< 0.005	0.01	84.6
2025	0.05	0.08	0.40	0.55	< 0.005	0.02	< 0.005	0.02	0.02	< 0.005	0.02	—	93.7	93.7	< 0.005	< 0.005	0.01	94.2

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.07	0.25	0.10	0.42	< 0.005	—	—	—	—	—	—	25.1	163	188	2.53	< 0.005	0.04	253
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01	0.20	0.09	0.08	< 0.005	—	—	—	—	—	—	25.1	162	187	2.53	< 0.005	0.04	251

Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.04	0.22	0.09	0.25	< 0.005	—	—	—	—	—	—	25.1	163	188	2.53	< 0.005	0.04	252
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01	0.04	0.02	0.05	< 0.005	—	—	—	—	—	—	4.16	26.9	31.1	0.42	< 0.005	0.01	41.7

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	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	0.00
Area	0.06	0.25	< 0.005	0.34	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.41	1.41	< 0.005	< 0.005	—	1.41
Energy	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	160	160	0.02	< 0.005	—	161
Water	—	—	—	—	—	—	—	—	—	—	—	0.89	1.69	2.58	0.09	< 0.005	—	5.54
Waste	—	—	—	—	—	—	—	—	—	—	—	24.2	0.00	24.2	2.42	0.00	—	84.7
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Vegetation	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Total	0.07	0.25	0.10	0.42	< 0.005	NaN	NaN	NaN	NaN	NaN	NaN	25.1	163	188	2.53	< 0.005	0.04	253
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	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	0.00
Area	—	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	160	160	0.02	< 0.005	—	161
Water	—	—	—	—	—	—	—	—	—	—	—	0.89	1.69	2.58	0.09	< 0.005	—	5.54

Waste	—	—	—	—	—	—	—	—	—	—	—	24.2	0.00	24.2	2.42	0.00	—	84.7
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Vegetation	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Total	0.01	0.20	0.09	0.08	< 0.005	NaN	NaN	NaN	NaN	NaN	NaN	25.1	162	187	2.53	< 0.005	0.04	251
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	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	0.00
Area	0.03	0.22	< 0.005	0.17	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.70	0.70	< 0.005	< 0.005	—	0.70
Energy	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	160	160	0.02	< 0.005	—	161
Water	—	—	—	—	—	—	—	—	—	—	—	0.89	1.69	2.58	0.09	< 0.005	—	5.54
Waste	—	—	—	—	—	—	—	—	—	—	—	24.2	0.00	24.2	2.42	0.00	—	84.7
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Vegetation	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Total	0.04	0.22	0.09	0.25	< 0.005	NaN	NaN	NaN	NaN	NaN	NaN	25.1	163	188	2.53	< 0.005	0.04	252
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	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	0.00
Area	0.01	0.04	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.12	0.12	< 0.005	< 0.005	—	0.12
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	26.5	26.5	< 0.005	< 0.005	—	26.7
Water	—	—	—	—	—	—	—	—	—	—	—	0.15	0.28	0.43	0.02	< 0.005	—	0.92
Waste	—	—	—	—	—	—	—	—	—	—	—	4.01	0.00	4.01	0.40	0.00	—	14.0
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Vegetation	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Total	0.01	0.04	0.02	0.05	< 0.005	NaN	NaN	NaN	NaN	NaN	NaN	4.16	26.9	31.1	0.42	< 0.005	0.01	41.7

3. Construction Emissions Details

3.1. Demolition (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.61	0.51	4.69	5.79	0.01	0.19	—	0.19	0.17	—	0.17	—	852	852	0.03	0.01	—	855
Demolition	—	—	—	—	—	—	0.31	0.31	—	0.05	0.05	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.13	0.16	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	23.3	23.3	< 0.005	< 0.005	—	23.4
Demolition	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.87	3.87	< 0.005	< 0.005	—	3.88
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.03	0.44	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	87.4	87.4	< 0.005	< 0.005	0.37	88.8
Vendor	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	0.00
Hauling	0.04	0.01	0.52	0.25	< 0.005	0.01	0.10	0.11	< 0.005	0.03	0.03	—	409	409	0.03	0.07	0.88	430
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.24	2.24	< 0.005	< 0.005	< 0.005	2.28
Vendor	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	0.00
Hauling	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	11.2	11.2	< 0.005	< 0.005	0.01	11.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.37	0.37	< 0.005	< 0.005	< 0.005	0.38
Vendor	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	0.00
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.85	1.85	< 0.005	< 0.005	< 0.005	1.95

3.3. Grading (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.41	1.19	11.4	10.7	0.02	0.53	—	0.53	0.49	—	0.49	—	1,713	1,713	0.07	0.01	—	1,719

Dust From Material Movement	—	—	—	—	—	—	2.07	2.07	—	1.00	1.00	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.05	0.47	0.44	< 0.005	0.02	—	0.02	0.02	—	0.02	—	70.4	70.4	< 0.005	< 0.005	—	70.6
Dust From Material Movement	—	—	—	—	—	—	0.09	0.09	—	0.04	0.04	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.09	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	11.7	11.7	< 0.005	< 0.005	—	11.7
Dust From Material Movement	—	—	—	—	—	—	0.02	0.02	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.02	0.33	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	65.6	65.6	< 0.005	< 0.005	0.28	66.6
Vendor	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	0.00
Hauling	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	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.52	2.52	< 0.005	< 0.005	< 0.005	2.56
Vendor	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	0.00
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.42	0.42	< 0.005	< 0.005	< 0.005	0.42
Vendor	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	0.00
Hauling	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	0.00

3.5. Building Construction (2024) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.67	0.56	5.60	6.98	0.01	0.26	—	0.26	0.23	—	0.23	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.67	0.56	5.60	6.98	0.01	0.26	—	0.26	0.23	—	0.23	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	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	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	0.16	1.63	2.03	< 0.005	0.07	—	0.07	0.07	—	0.07	—	380	380	0.02	< 0.005	—	382
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.30	0.37	< 0.005	0.01	—	0.01	0.01	—	0.01	—	63.0	63.0	< 0.005	< 0.005	—	63.2
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.15	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.9	28.9	< 0.005	< 0.005	0.12	29.4
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.4	35.4	< 0.005	0.01	0.09	37.1
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.13	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	26.8	26.8	< 0.005	< 0.005	< 0.005	27.2
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.4	35.4	< 0.005	0.01	< 0.005	37.1
Hauling	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	7.90	7.90	< 0.005	< 0.005	0.02	8.02
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	10.3	10.3	< 0.005	< 0.005	0.01	10.8
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.31	1.31	< 0.005	< 0.005	< 0.005	1.33

Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.71	1.71	< 0.005	< 0.005	< 0.005	1.79
Hauling	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	0.00

3.7. Building Construction (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	0.52	5.14	6.94	0.01	0.22	—	0.22	0.20	—	0.20	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.62	0.52	5.14	6.94	0.01	0.22	—	0.22	0.20	—	0.20	—	1,305	1,305	0.05	0.01	—	1,309
Onsite truck	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	0.19	1.89	2.55	< 0.005	0.08	—	0.08	0.07	—	0.07	—	480	480	0.02	< 0.005	—	482
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.03	0.35	0.47	< 0.005	0.01	—	0.01	0.01	—	0.01	—	79.5	79.5	< 0.005	< 0.005	—	79.7
Onsite truck	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	0.00

Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.14	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	28.4	28.4	< 0.005	< 0.005	0.11	28.8
Vendor	< 0.005	< 0.005	0.04	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	34.9	34.9	< 0.005	0.01	0.09	36.5
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.12	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	26.3	26.3	< 0.005	< 0.005	< 0.005	26.6
Vendor	< 0.005	< 0.005	0.05	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	34.9	34.9	< 0.005	0.01	< 0.005	36.4
Hauling	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	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	9.78	9.78	< 0.005	< 0.005	0.02	9.92
Vendor	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	12.8	12.8	< 0.005	< 0.005	0.01	13.4
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.62	1.62	< 0.005	< 0.005	< 0.005	1.64
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	2.12	2.12	< 0.005	< 0.005	< 0.005	2.22
Hauling	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	0.00

3.9. Paving (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.61	0.51	4.37	5.31	0.01	0.19	—	0.19	0.18	—	0.18	—	823	823	0.03	0.01	—	826
Paving	—	0.01	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.03	0.25	0.31	< 0.005	0.01	—	0.01	0.01	—	0.01	—	47.4	47.4	< 0.005	< 0.005	—	47.5
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.06	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.84	7.84	< 0.005	< 0.005	—	7.87
Paving	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06	0.06	0.04	0.72	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	150	150	< 0.005	0.01	0.59	152
Vendor	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	0.00
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.08	8.08	< 0.005	< 0.005	0.01	8.20
Vendor	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	0.00
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.34	1.34	< 0.005	< 0.005	< 0.005	1.36
Vendor	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	0.00
Hauling	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	0.00

3.11. Architectural Coating (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.13	0.88	1.14	< 0.005	0.03	—	0.03	0.03	—	0.03	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	—	3.96	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.05	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.68	7.68	< 0.005	< 0.005	—	7.71
Architectural Coatings	—	0.23	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.27	1.27	< 0.005	< 0.005	—	1.28
Architectural Coatings	—	0.04	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	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	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.67	5.67	< 0.005	< 0.005	0.02	5.76
Vendor	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	0.00
Hauling	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.31	0.31	< 0.005	< 0.005	< 0.005	0.31
Vendor	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	0.00
Hauling	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05
Vendor	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	0.00
Hauling	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	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	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	0.00
Parking Lot	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	0.00
Total	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	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	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	0.00
Parking Lot	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	0.00
Total	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	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	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	0.00
Parking Lot	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	0.00
Total	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	0.00

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	48.1	48.1	0.01	< 0.005	—	48.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	1.54	1.54	< 0.005	< 0.005	—	1.55
Total	—	—	—	—	—	—	—	—	—	—	—	—	49.6	49.6	0.01	< 0.005	—	50.1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	48.1	48.1	0.01	< 0.005	—	48.5
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	1.54	1.54	< 0.005	< 0.005	—	1.55
Total	—	—	—	—	—	—	—	—	—	—	—	—	49.6	49.6	0.01	< 0.005	—	50.1
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	7.96	7.96	< 0.005	< 0.005	—	8.04
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	0.25	0.25	< 0.005	< 0.005	—	0.26
Total	—	—	—	—	—	—	—	—	—	—	—	—	8.21	8.21	< 0.005	< 0.005	—	8.29

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	111	111	0.01	< 0.005	—	111
Parking Lot	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
Total	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	111	111	0.01	< 0.005	—	111
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	111	111	0.01	< 0.005	—	111
Parking Lot	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
Total	0.01	0.01	0.09	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	111	111	0.01	< 0.005	—	111
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18.3	18.3	< 0.005	< 0.005	—	18.4
Parking Lot	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
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18.3	18.3	< 0.005	< 0.005	—	18.4

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.06	0.06	< 0.005	0.34	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.41	1.41	< 0.005	< 0.005	—	1.41
Total	0.06	0.25	< 0.005	0.34	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.41	1.41	< 0.005	< 0.005	—	1.41
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.17	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.02	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	—	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	0.01	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.12	0.12	< 0.005	< 0.005	—	0.12
Total	0.01	0.04	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.12	0.12	< 0.005	< 0.005	—	0.12

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	0.89	1.69	2.58	0.09	< 0.005	—	5.54
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.89	1.69	2.58	0.09	< 0.005	—	5.54
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	0.89	1.69	2.58	0.09	< 0.005	—	5.54
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.89	1.69	2.58	0.09	< 0.005	—	5.54
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	0.15	0.28	0.43	0.02	< 0.005	—	0.92
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	0.15	0.28	0.43	0.02	< 0.005	—	0.92

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	24.2	0.00	24.2	2.42	0.00	—	84.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	24.2	0.00	24.2	2.42	0.00	—	84.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	24.2	0.00	24.2	2.42	0.00	—	84.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	24.2	0.00	24.2	2.42	0.00	—	84.7
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	4.01	0.00	4.01	0.40	0.00	—	14.0
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	4.01	0.00	4.01	0.40	0.00	—	14.0

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.04	0.04
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Health Club	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
undefined	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
undefined	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—

—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
undefined	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
undefined	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
undefined	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
undefined	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	NaN	NaN	NaN	NaN	NaN	NaN	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	7/1/2024	7/12/2024	5.00	10.0	—
Grading	Grading	7/15/2024	8/2/2024	5.00	15.0	—
Building Construction	Building Construction	8/5/2024	7/7/2025	5.00	241	—
Paving	Paving	6/7/2025	7/7/2025	5.00	21.0	—
Architectural Coating	Architectural Coating	6/7/2025	7/7/2025	5.00	21.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.00	6.00	84.0	0.37
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.00	33.0	0.73
Grading	Graders	Diesel	Average	1.00	6.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	6.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	4.00	367	0.29

Building Construction	Forklifts	Diesel	Average	2.00	6.00	82.0	0.20
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.00	84.0	0.37
Paving	Cement and Mortar Mixers	Diesel	Average	4.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	7.00	81.0	0.42
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	10.0	11.7	LDA,LDT1,LDT2
Demolition	Vendor	—	8.40	HHDT,MHDT
Demolition	Hauling	5.60	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	7.50	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	3.31	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	1.29	8.40	HHDT,MHDT

Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	17.5	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	0.66	11.7	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	8.40	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	11,825	3,942	188

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Ton of Debris)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	222	—

Grading	—	—	11.3	0.00	—
Paving	0.00	0.00	0.00	0.00	0.07

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Health Club	0.00	0%
Parking Lot	0.07	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2024	0.00	204	0.03	< 0.005
2025	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Health Club	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0	0.00	11,825	3,942	188

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Health Club	86,005	204	0.0330	0.0040	345,190
Parking Lot	2,747	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)

Health Club	466,225	0.00
Parking Lot	0.00	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Health Club	44.9	—
Parking Lot	0.00	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Health Club	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Health Club	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Paving and architectural coating will take place concurrently with the final month of building construction.
Operations: Vehicle Data	This model run is for the construction and non-mobile source operations of the gymnasium, which does not generate trips. See separate CalEEMod run for the motor vehicle emissions.

APPENDIX B

Cultural Resources Documentation

811 West 7th Street, Suite 200
Los Angeles, California 90017
www.impactsciences.com

Sent via email on January 10, 2024 to: Andrew.Green@nahc.ca.gov

NATIVE AMERICAN HERITAGE COMMISSION
Environmental and Cultural Department
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
(916) 373-3710

Information Below is Required for a Sacred Lands File Search

Project: Stratford Preparatory School Project

County: Santa Clara

USGS Quadrangle Name: Milpitas, California

Township: 6 South **Range**: 1 East

Company/Firm/Agency: Impact Sciences, Inc.

Contact Person: Eleni Getachew

Street Address: 811 W. 7th Street, Suite 200

City: Los Angeles **Zip**: 90017

Phone: (805) 453-2862

Email: egetachew@impactsciences.com

PROJECT LOCATION

The Project is located at 1323 Great Mall Drive in the southern portion of the City of Milpitas (Project Site) (Assessor Parcel Number [APN] 086-24-046). The Project Site is located approximately 0.70 west of Interstate 680 (I-680), 0.90 miles west of I-880, and 428 feet north of Montague Expressway (see **Figure 1**, **Regional Location** and **Figure 2**, **Project Site**).

PROJECT DESCRIPTION

The Stratford Preparatory School Project (Project) proposes to redevelop the existing building on-site into a new preparatory school. The Project would also demolish the existing surface parking lot to construct a new 7,883 square foot gymnasium building that would be located west of the remodeled existing building. Supporting rooms for the gymnasium, such as locker rooms, gymnasium storage, a gymnasium office, and restrooms will be located in the southwestern corner of the existing building. The Project would accommodate students from the existing Stratford School facility located south of the Project Site. The Project would be equipped with 41 classrooms (general/biochemistry/art/physical engineering), eight offices, four media common rooms, a library, and a theater. Additionally, the Project would include supporting components, such as a new trash enclosure and a 14,695 square foot artificial turf playfield located to the west of the new gymnasium building (see **Figure 3**, **Conceptual Site Plan**).

We appreciate your assistance in responding to this query. Your response will help ensure that our analysis is accurate and complete. To ensure a timely completion of our analysis, please provide your response (via mail, or email) no later than February 10, 2024.

If you have any questions or require any additional information, please contact me at (805) 453-2862 or via email at egetachew@impactsciences.com.

Sincerely,

_____

Eleni Getachew
Planner

IMPACT SCIENCES

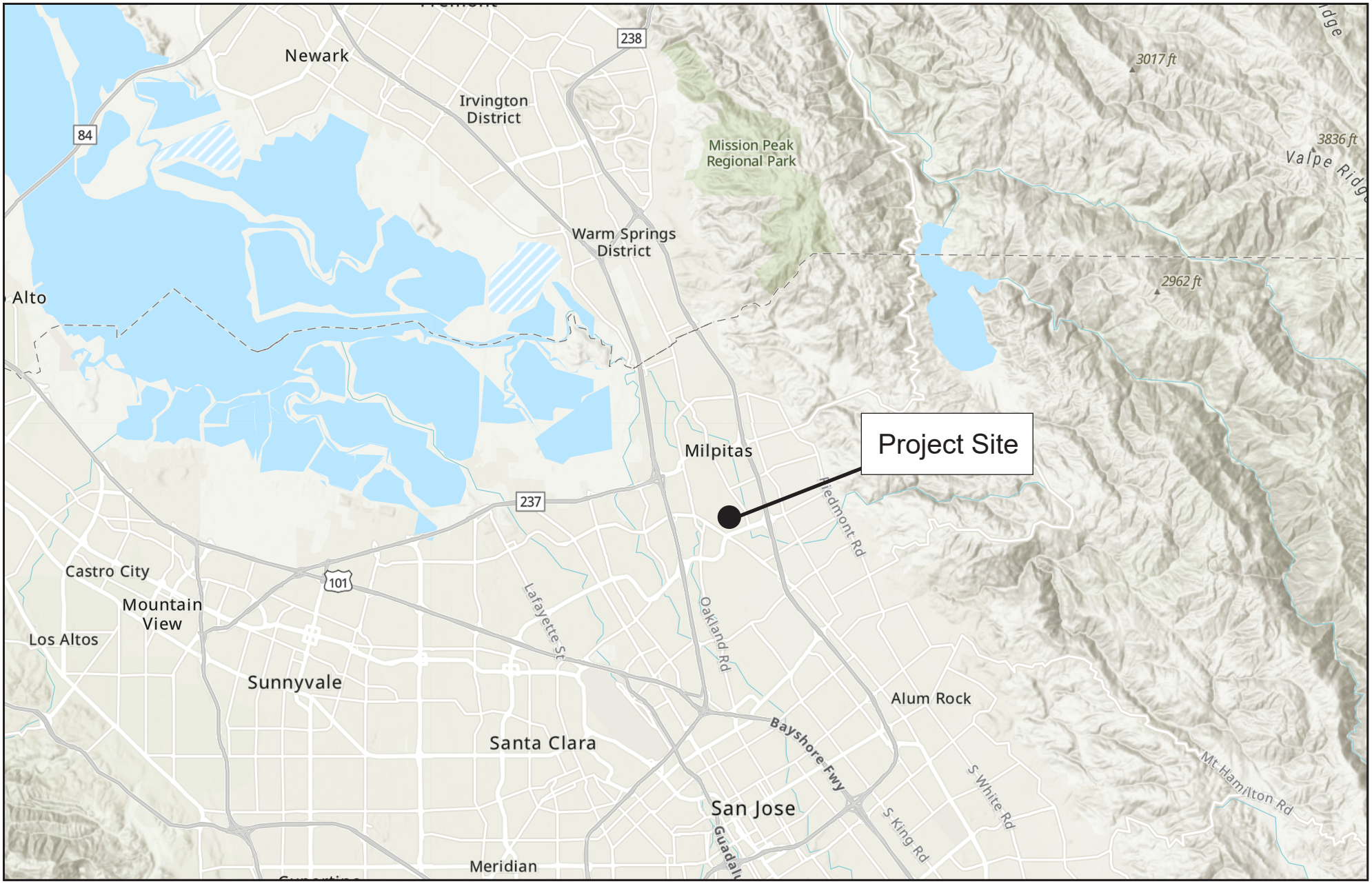
811 W. 7th Street, Suite 200
Los Angeles, CA 90017
egetachew@impactsciences.com

Attachments:

Figure 1 – Regional Location Map

Figure 2 – Project Site

Figure 3 - Conceptual Site Plan



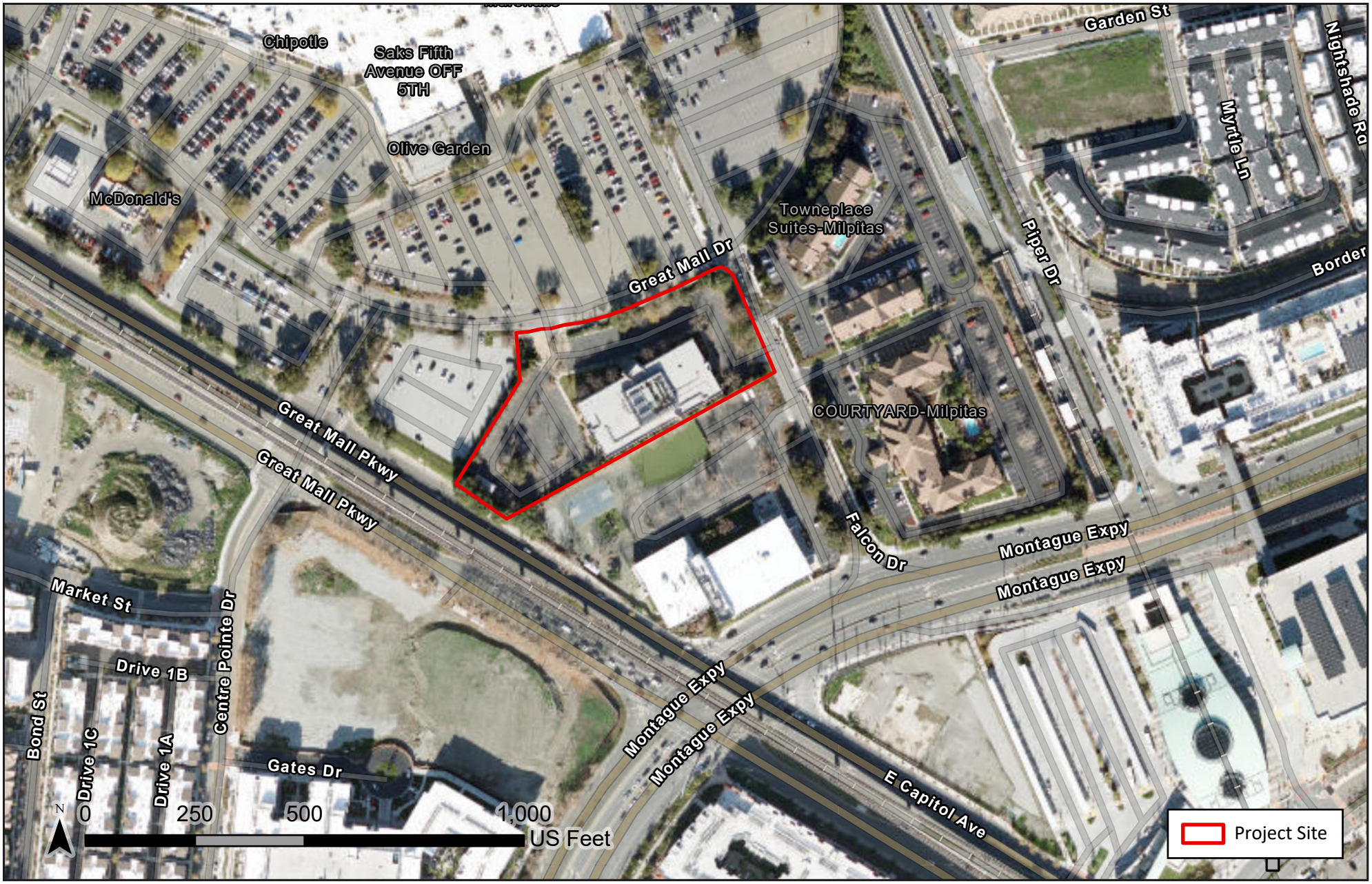
SOURCE: Esri, 2023

FIGURE 1

IMPACT SCIENCES

Regional Location

1451.002•12/23



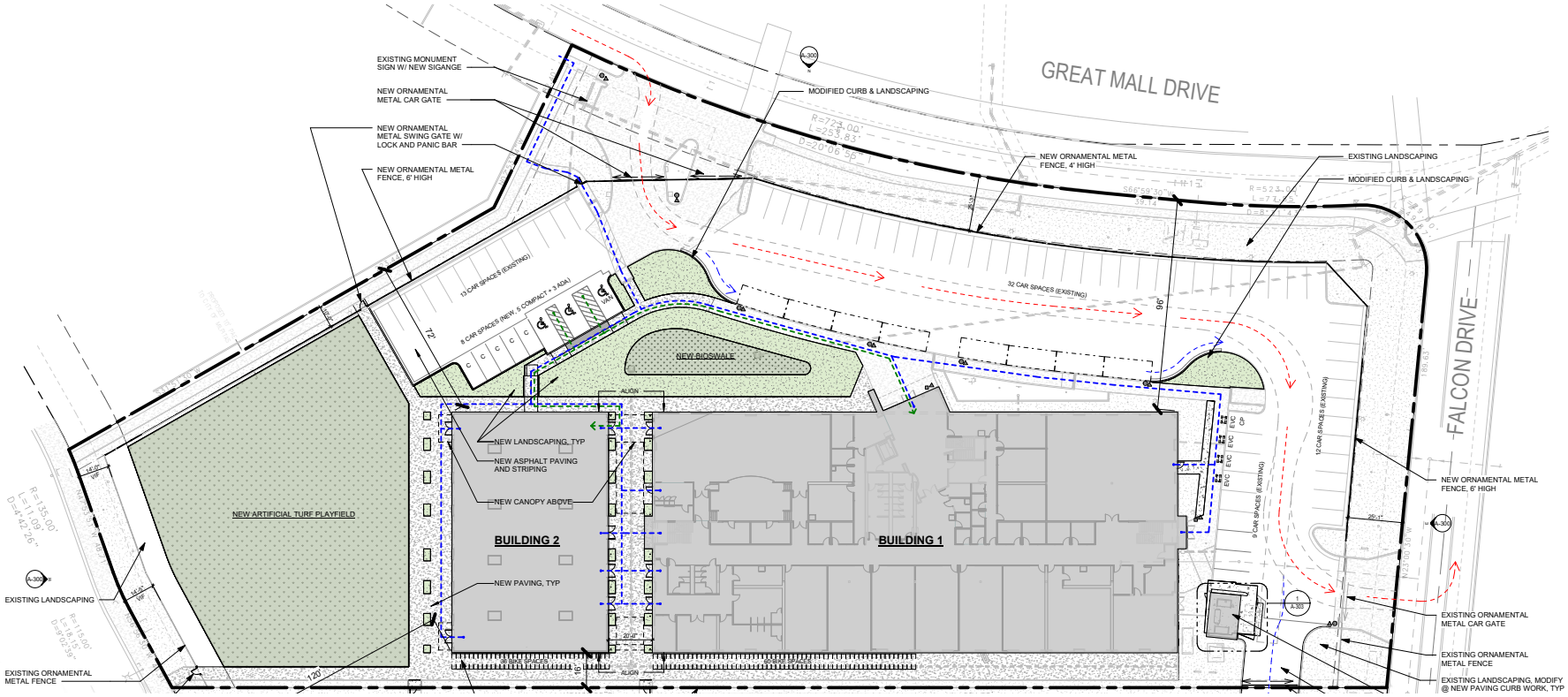
SOURCE: Esri, 2023

FIGURE **2**

IMPACT SCIENCES

Project Site

1451.002•12/23



SOURCE: Inhabit Designs 2023

FIGURE **3**

IMPACT SCIENCES

Conceptual Site Plan

1451.002•12/23

NATIVE AMERICAN HERITAGE COMMISSION

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

January 26, 2024

Eleni Getachew
Impact Sciences, Inc.

Via Email to: egetachew@impactsciences.com

Re: Stratford Preparatory School Project, Santa Clara County

To Whom It May Concern:

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed project area. I suggest you contact all of those indicated; if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify me. With your assistance, we can assure that our lists contain current information.

If you have any questions or need additional information, please contact me at my email address: Cody.Campagne@nahc.ca.gov.

Sincerely,

Cody Campagne

Cody Campagne
Cultural Resources Analyst

Attachment

IMPACT SCIENCES

811 W. 7th Street, Suite 200
Los Angeles, CA 90017
(213) 935-1901
www.impactsciences.com

SENT VIA EMAIL: nwic@sonoma.edu

January 10, 2024

Northwest Information Center
Sonoma State University,
1400 Valley House Drive, Suite 210,
Rohnert Park, CA 94928-3609

RE: – Request for Service Information-Stratford Preparatory School Project

To Whom it May Concern,

Impact Sciences, Inc. is preparing an Initial Study/Mitigated Negative Declaration for the proposed Stratford Preparatory School Project in accordance with the California Environmental Quality Act (CEQA). As such, we are requesting an historical and archaeological resources records search. Below you will find a brief description of the project location and description. Maps depicting the project location and site plan are included.

Project Location

The Stratford Preparatory School Project (Project)proposes improvements to an adjacent property located at 1323 Great Mall Drive(Assessor Parcel Number [APN] 086-24-046) in the southern perimeter of the City of Milpitas (Project Site). Adjacent roadways to the Project include Great Mall Drive, Falcon Drive, and Great Mall Parkway The Project Site is located approximately 0.70 west of Interstate 680 (I-680), 0.90 miles west of I-880, and 428 feet north of Montague Expressway (see **Figure 1**, **Regional Location** and **Figure 2**, **Project Site**).

The legal description is:

California, Mt. Diablo Meridian T06S,R01E

The 7.5 minute series topographic maps for that area:

Newark	Niles	La Costa Valley
Mountain View	**Milpitas**	Calaveras Reservoir
Cupertino	San Jose West	San Jose East

Project Description

The Project would remodel the existing building on-site into a new preparatory school. The Project would also demolish the existing surface parking lot to construct a new 7,883 square foot gymnasium building that would be located west of the remodeled existing building. Supporting rooms for the gymnasium, such

as locker rooms, gymnasium storage, a gymnasium office, and restrooms will be located in the southwestern corner of the existing building. The Project would accommodate students from the existing Stratford School facility located south of the Project Site. The Project would be equipped with 41 classrooms (general/biochemistry/art/physical engineering), eight offices, four media common rooms, a library, and a theater. Additionally, the Project would include supporting components, such as a new trash enclosure and a 14,695 square foot artificial turf playfield located to the west of the new gymnasium building (see **Figure 3**, **Conceptual Site Plan**).

Thank you for your assistance in responding to this query. Your responses will help us ensure that our analysis is accurate and complete. In order to ensure a timely completion of our analysis, please provide your response (via mail, or email) no later than **February 10, 2023.**

If you have any questions or require any additional information, please call me at 213.935.1901 ext. 323. You may also reach me by email at egetachew@impactsciences.com.

Sincerely,

Eleni Getachew
Planner

IMPACT SCIENCES

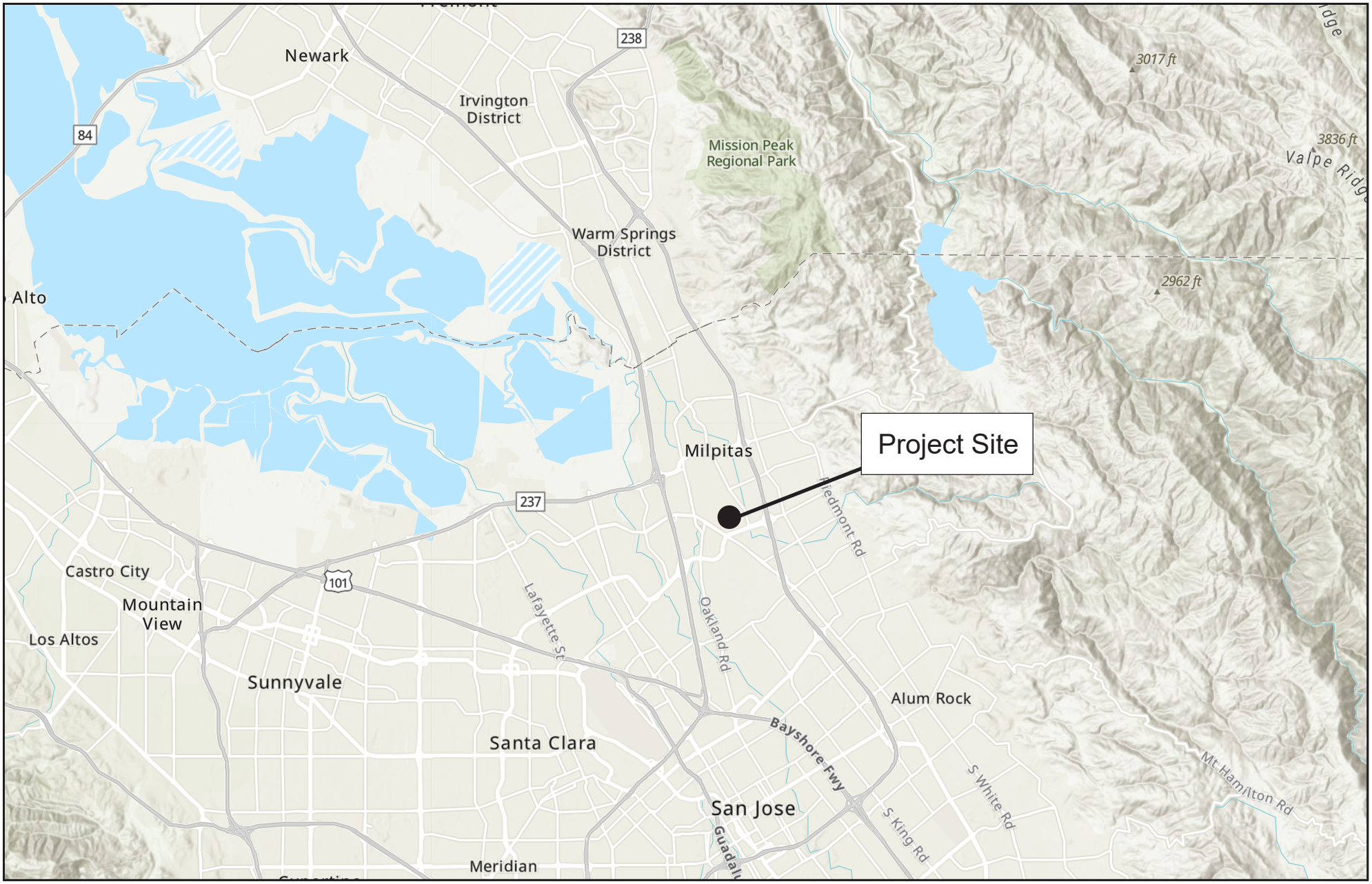
811 W. 7th Street, Suite 200, Los Angeles, CA 90017
o: 213.935.1901 Ext. 323 | c: 805.453.2862
egetachew@impactsciences.com

Attachments:

Figure 1 – Regional Location Map

Figure 2 – Project Site

Figure 3 - Conceptual Site Plan



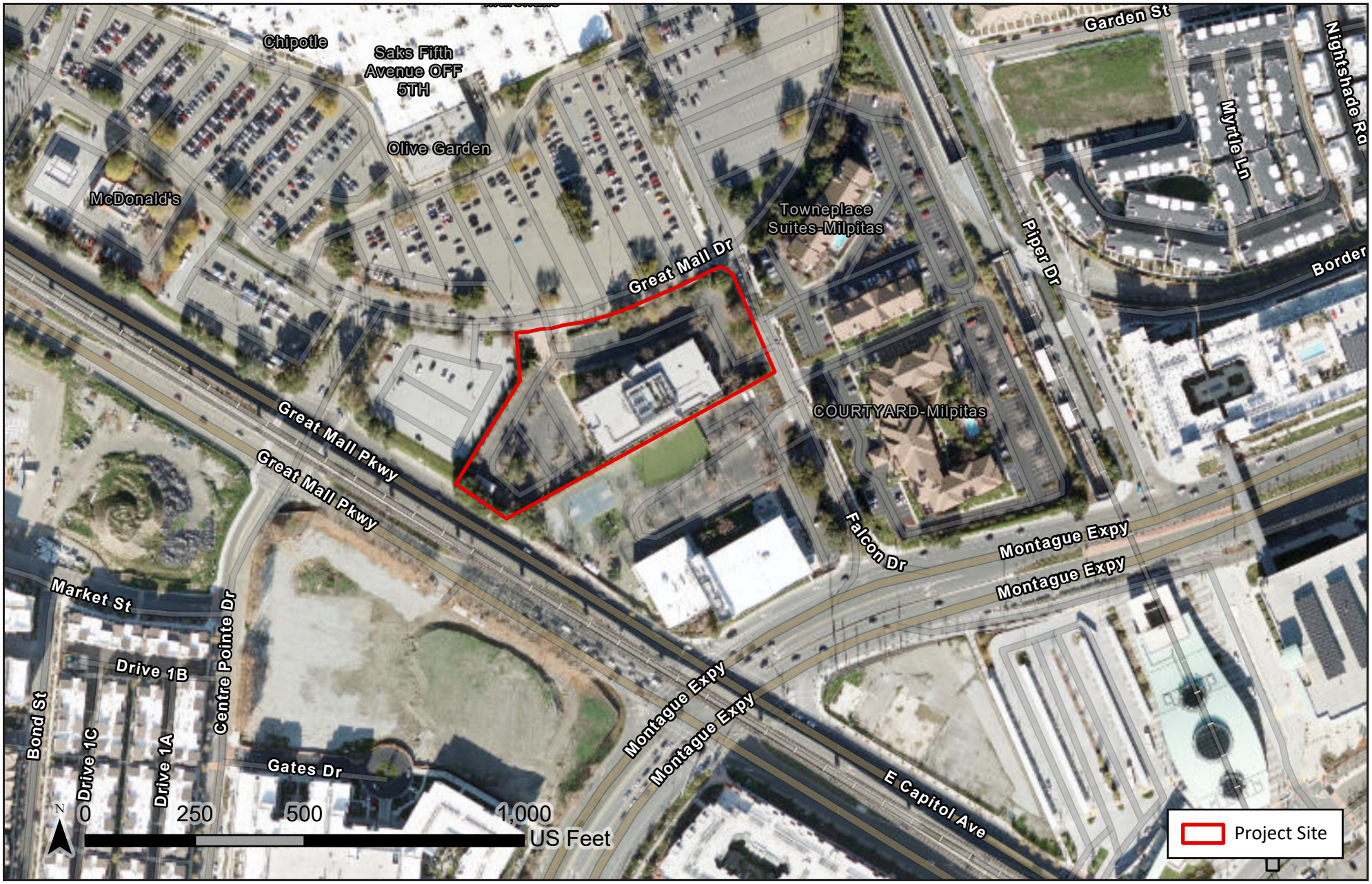
SOURCE: Esri, 2023

FIGURE 1

IMPACT SCIENCES

Regional Location

1451.002•12/23



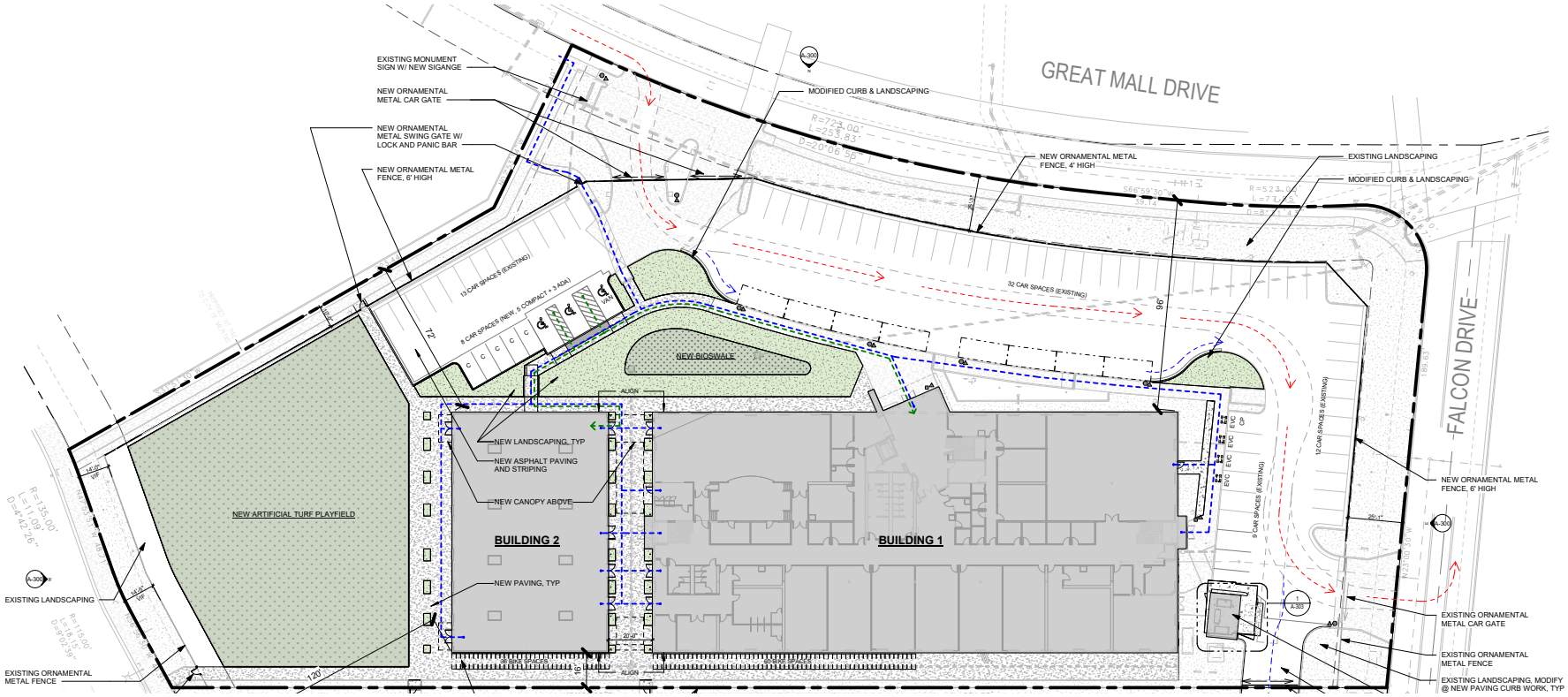
SOURCE: Esri, 2023

FIGURE **2**

IMPACT SCIENCES

Project Site

1451.002•12/23



SOURCE: Inhabit Designs 2023

FIGURE **3**

IMPACT SCIENCES

Conceptual Site Plan

1451.002•12/23

APPENDIX C

Noise Data

NOISE MONITORING FIELD REPORT

Project Name: 1323 Great Mall Drive Project

Monitoring Location: Falcon Drive (One off)

Date: 12/14/23 Site Number: 1

Measured By: Annalie Sarrieddine

Measurement Start Time: 7:52 AM

Measurement End Time: 7:52 AM

Total Measurement Time: 15 min.

Noise Meter Model: Larson Davis Soundtrack LxT Calibration: 94.0 (dBA)

Meter Setting: A-Weighted Sound Level (SLOW)

Session File Name: Lxt_Data_298s

Primary Noise Sources: Morning student drop off Vehicle traffic

Site Map

Data Summary

Noise Scale	Noise Level (dBA)
L_{eq}	64.6
L_{max}	81.0
L_{min}	57.2

Other Noise Sources During Monitoring

1. Car Horn Time: 7:44
2. _____ Time: _____
3. _____ Time: _____
4. _____ Time: _____
5. _____ Time: _____

Additional Notes:

IMPACT SCIENCES

Measurement Report

Report Summary

Meter's File Name	LxT_Data.298.s	Computer's File Name	LxT_0005667-20231214 073723-LxT_Data.298.ldbin
Meter	LxT1 0005667	Firmware	2.302
User		Location	
Job Description			
Note			

Start Time	2023-12-14 07:37:23	Duration	0:15:00.0		
End Time	2023-12-14 07:52:23	Run Time	0:15:00.0	Pause Time	0:00:00.0
Pre-Calibration	2023-12-14 07:16:27	Post-Calibration	None	Calibration Deviation	---

Results

Overall Metrics

LA_{eq}	64.6 dB		
LAE	94.1 dB	SEA	--- dB
EA	288.4 µPa²h		
EA8	9.2 mPa²h		
EA40	46.1 mPa²h		
LA_{peak}	93.7 dB	2023-12-14 07:44:13	
LAS_{max}	81.0 dB	2023-12-14 07:44:13	
LAS_{min}	57.2 dB	2023-12-14 07:43:10	
LA_{eq}	64.6 dB		
LC_{eq}	74.5 dB	LC_{eq} - LA_{eq}	9.9 dB
LAI_{eq}	66.1 dB	LAI_{eq} - LA_{eq}	1.5 dB

Exceedances

	Count	Duration
LAS > 85.0 dB	0	0:00:00.0
LAS > 115.0 dB	0	0:00:00.0
LApk > 135.0 dB	0	0:00:00.0
LApk > 137.0 dB	0	0:00:00.0
LApk > 140.0 dB	0	0:00:00.0

Community Noise

L_{DN}	L_{Day}	L_{Night}
--- dB	--- dB	0.0 dB

L_{DEN}	L_{Day}	L_{Eve}	L_{Night}
--- dB	--- dB	--- dB	--- dB

Any Data

	A		C		Z	
	Level	Time Stamp	Level	Time Stamp	Level	Time Stamp
L_{eq}	64.6 dB		74.5 dB		--- dB	
$L_{S(max)}$	81.0 dB	2023-12-14 07:44:13	--- dB	None	--- dB	None
$L_{S(min)}$	57.2 dB	2023-12-14 07:43:10	--- dB	None	--- dB	None
$L_{Peak(max)}$	93.7 dB	2023-12-14 07:44:13	--- dB	None	--- dB	None

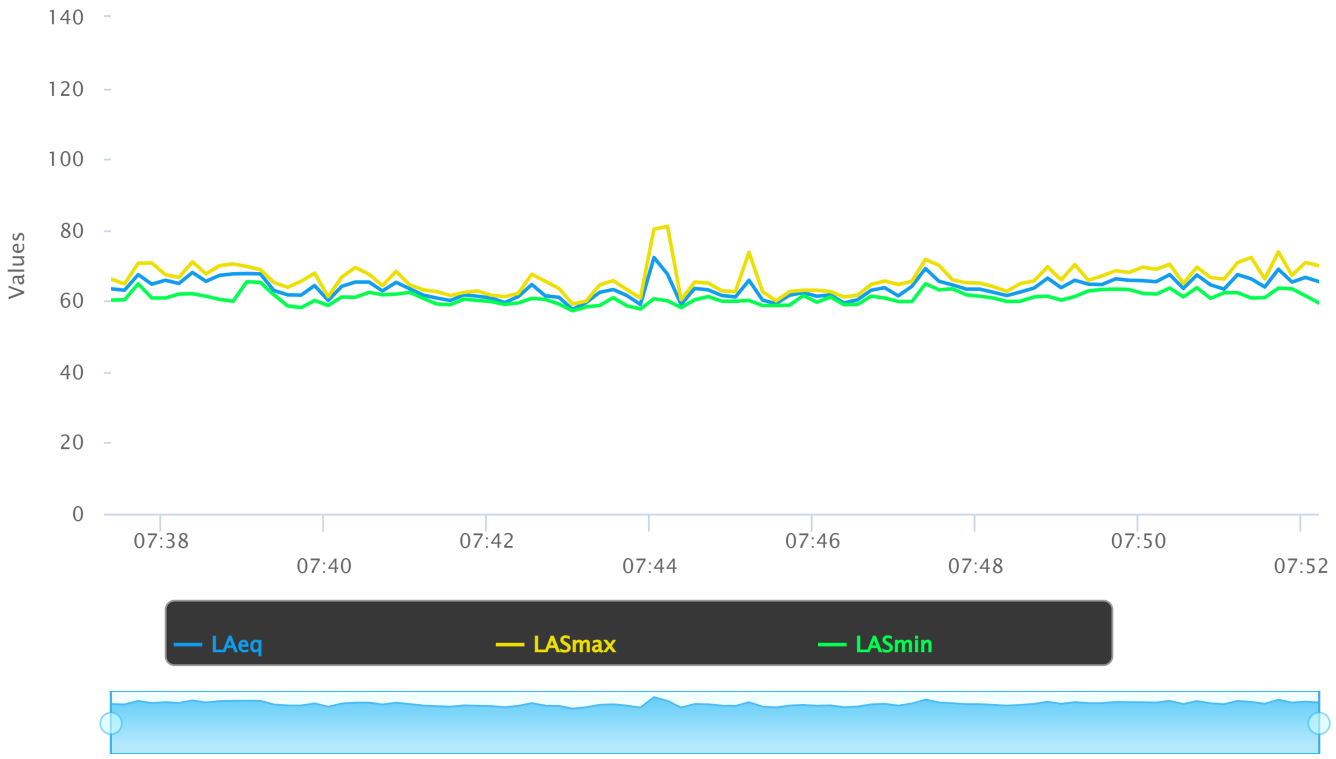
Overloads

Count	Duration	OBA Count	OBA Duration
0	0:00:00.0	0	0:00:00.0

Statistics

LAS 0.0	--- dB
LAS 0.0	--- dB
LAS 10.0	67.4 dB
LAS 33.3	64.2 dB
LAS 66.7	61.7 dB
LAS 90.0	59.7 dB

Time History



NOISE MONITORING FIELD REPORT

Site Map

Project Name: 1323 Great Mall Drive Project

Monitoring Location: Falcon Drive (Pick-up)

Date: 12/14/23 Site Number: 1

Measured By: Annalie Sarrieddine

Measurement Start Time: 3:02 PM

Measurement End Time: 3:17 PM

Total Measurement Time: 15 min.

Noise Meter Model: Larson Davis Soundtrack LxT **Calibration:** 94.0 (dBA)

Meter Setting: A-Weighted Sound Level (SLOW)

Session File Name: Lxt. Data. 3035

Primary Noise Sources: After school drop off vehicle traffic, car honking, retail vehicle traffic

Data Summary

Noise Scale	Noise Level (dBA)
L_{eq}	66.1
L_{max}	79.5
L_{min}	54.5

Other Noise Sources During Monitoring

1. Helicopter Time: 3:10
2. Vehicle honking altercation Time: 3:16
3. _____ Time: _____
4. _____ Time: _____
5. _____ Time: _____

Additional Notes:

IMPACT SCIENCES

Measurement Report

Report Summary

Meter's File Name	LxT_Data.303.s	Computer's File Name	LxT_0005667-20231214 150202-LxT_Data.303.ldbin
Meter	LxT1 0005667	Firmware	2.302
User		Location	
Job Description			
Note			

Start Time	2023-12-14 15:02:02	Duration	0:15:00.0		
End Time	2023-12-14 15:17:02	Run Time	0:15:00.0	Pause Time	0:00:00.0
Pre-Calibration	2023-12-14 07:16:27	Post-Calibration	None	Calibration Deviation	---

Results

Overall Metrics

LA_{eq}	66.1 dB		
LAE	95.6 dB	SEA	--- dB
EA	407.4 µPa²h		
EA8	13.0 mPa²h		
EA40	65.2 mPa²h		
LA_{peak}	92.6 dB	2023-12-14 15:08:46	
LAS_{max}	79.5 dB	2023-12-14 15:09:15	
LAS_{min}	54.5 dB	2023-12-14 15:04:00	
LA_{eq}	66.1 dB		
LC_{eq}	76.2 dB	LC_{eq} - LA_{eq}	10.1 dB
LAI_{eq}	67.6 dB	LAI_{eq} - LA_{eq}	1.5 dB

Exceedances

	Count	Duration
LAS > 85.0 dB	0	0:00:00.0
LAS > 115.0 dB	0	0:00:00.0
LApk > 135.0 dB	0	0:00:00.0
LApk > 137.0 dB	0	0:00:00.0
LApk > 140.0 dB	0	0:00:00.0

Community Noise

L_{DN}	L_{Day}	L_{Night}
--- dB	--- dB	0.0 dB

L_{DEN}	L_{Day}	L_{Eve}	L_{Night}
--- dB	--- dB	--- dB	--- dB

Any Data

	A		C		Z	
	Level	Time Stamp	Level	Time Stamp	Level	Time Stamp
L_{eq}	66.1 dB		76.2 dB		--- dB	
$LS_{(max)}$	79.5 dB	2023-12-14 15:09:15	--- dB	None	--- dB	None
$LS_{(min)}$	54.5 dB	2023-12-14 15:04:00	--- dB	None	--- dB	None
$L_{Peak(max)}$	92.6 dB	2023-12-14 15:08:46	--- dB	None	--- dB	None

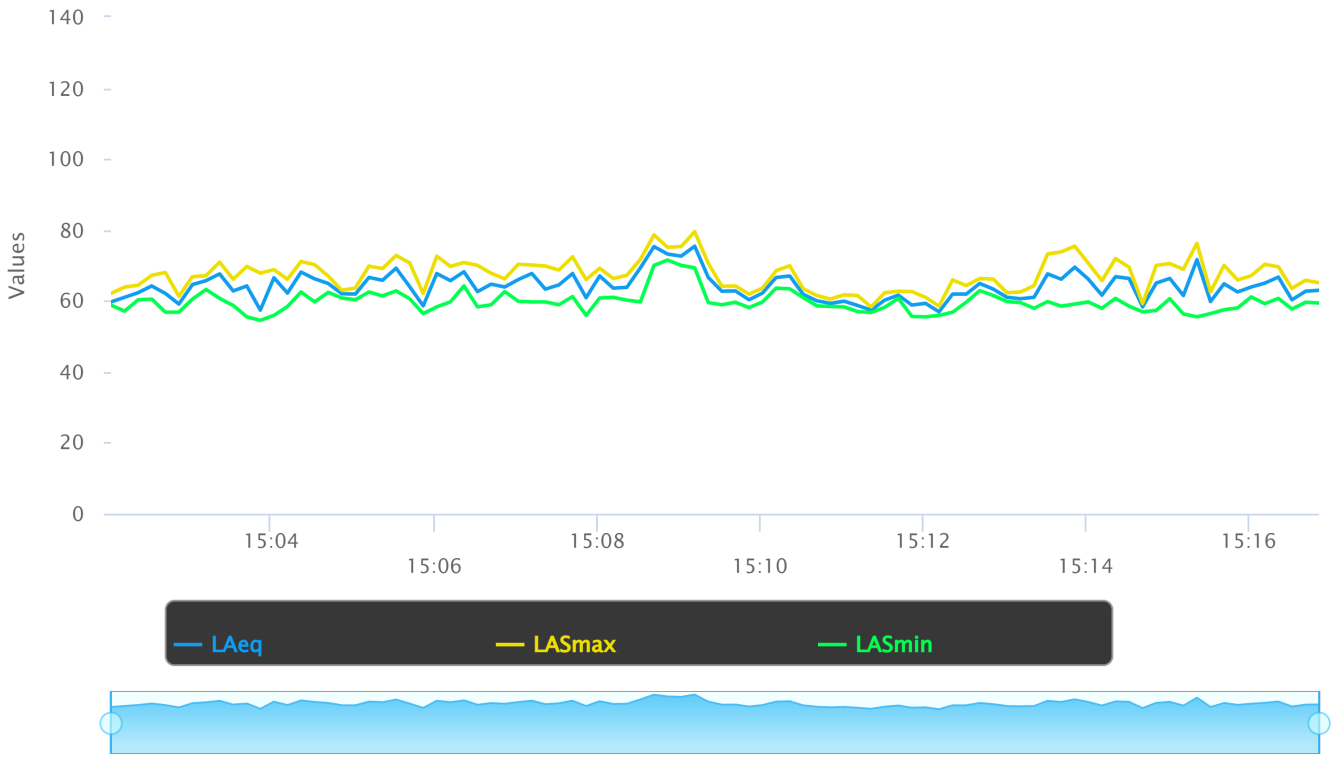
Overloads

Count	Duration	OBA Count	OBA Duration
0	0:00:00.0	0	0:00:00.0

Statistics

LAS 0.0	--- dB
LAS 0.0	--- dB
LAS 10.0	69.5 dB
LAS 33.3	64.5 dB
LAS 66.7	61.0 dB
LAS 90.0	58.3 dB

Time History



NOISE MONITORING FIELD REPORT

Project Name: 1323 Great Mall Drive Project

Monitoring Location: Great Mall Drive

Date: 12/14/23 Site Number: 2

Measured By: Annalie Sarrieddine

Measurement Start Time: 7:57 AM

Measurement End Time: 8:12 AM

Total Measurement Time: 15 min.

Noise Meter Model: Larson Davis Soundtrack LxT

Calibration: 94.0 (dBA)

Meter Setting: A-Weighted Sound Level (SLOW)

Session File Name: Lxt. Data. 299.s

Primary Noise Sources: Morning student drop off traffic

Site Map

Data Summary

Noise Scale	Noise Level (dBA)
L_{eq}	64.7
L_{max}	79.6
L_{min}	57.7

Other Noise Sources During Monitoring

1. _____ Time: _____
2. _____ Time: _____
3. _____ Time: _____
4. _____ Time: _____
5. _____ Time: _____

Additional Notes:

IMPACT SCIENCES

Measurement Report

Report Summary

Meter's File Name	LxT_Data.299.s	Computer's File Name	LxT_0005667-20231214 075701-LxT_Data.299.ldbin
Meter	LxT1 0005667	Firmware	2.302
User		Location	
Job Description			
Note			

Start Time	2023-12-14 07:57:01	Duration	0:15:00.0		
End Time	2023-12-14 08:12:01	Run Time	0:15:00.0	Pause Time	0:00:00.0
Pre-Calibration	2023-12-14 07:16:27	Post-Calibration	None	Calibration Deviation	---

Results

Overall Metrics

LA_{eq}	64.7 dB		
LAE	94.2 dB	SEA	--- dB
EA	295.1 µPa²h		
EA8	9.4 mPa²h		
EA40	47.2 mPa²h		
LA_{peak}	100.5 dB	2023-12-14 08:00:43	
LAS_{max}	79.6 dB	2023-12-14 08:00:45	
LAS_{min}	57.7 dB	2023-12-14 08:08:41	
LA_{eq}	64.7 dB		
LC_{eq}	73.0 dB	LC_{eq} - LA_{eq}	8.3 dB
LAI_{eq}	67.1 dB	LAI_{eq} - LA_{eq}	2.4 dB

Exceedances

	Count	Duration
LAS > 85.0 dB	0	0:00:00.0
LAS > 115.0 dB	0	0:00:00.0
LApk > 135.0 dB	0	0:00:00.0
LApk > 137.0 dB	0	0:00:00.0
LApk > 140.0 dB	0	0:00:00.0

Community Noise

L_{DN}	L_{Day}	L_{Night}
--- dB	--- dB	0.0 dB

L_{DEN}	L_{Day}	L_{Eve}	L_{Night}
--- dB	--- dB	--- dB	--- dB

Any Data

	A		C		Z	
	Level	Time Stamp	Level	Time Stamp	Level	Time Stamp
L_{eq}	64.7 dB		73.0 dB		--- dB	
$LS_{(max)}$	79.6 dB	2023-12-14 08:00:45	--- dB	None	--- dB	None
$LS_{(min)}$	57.7 dB	2023-12-14 08:08:41	--- dB	None	--- dB	None
$L_{Peak(max)}$	100.5 dB	2023-12-14 08:00:43	--- dB	None	--- dB	None

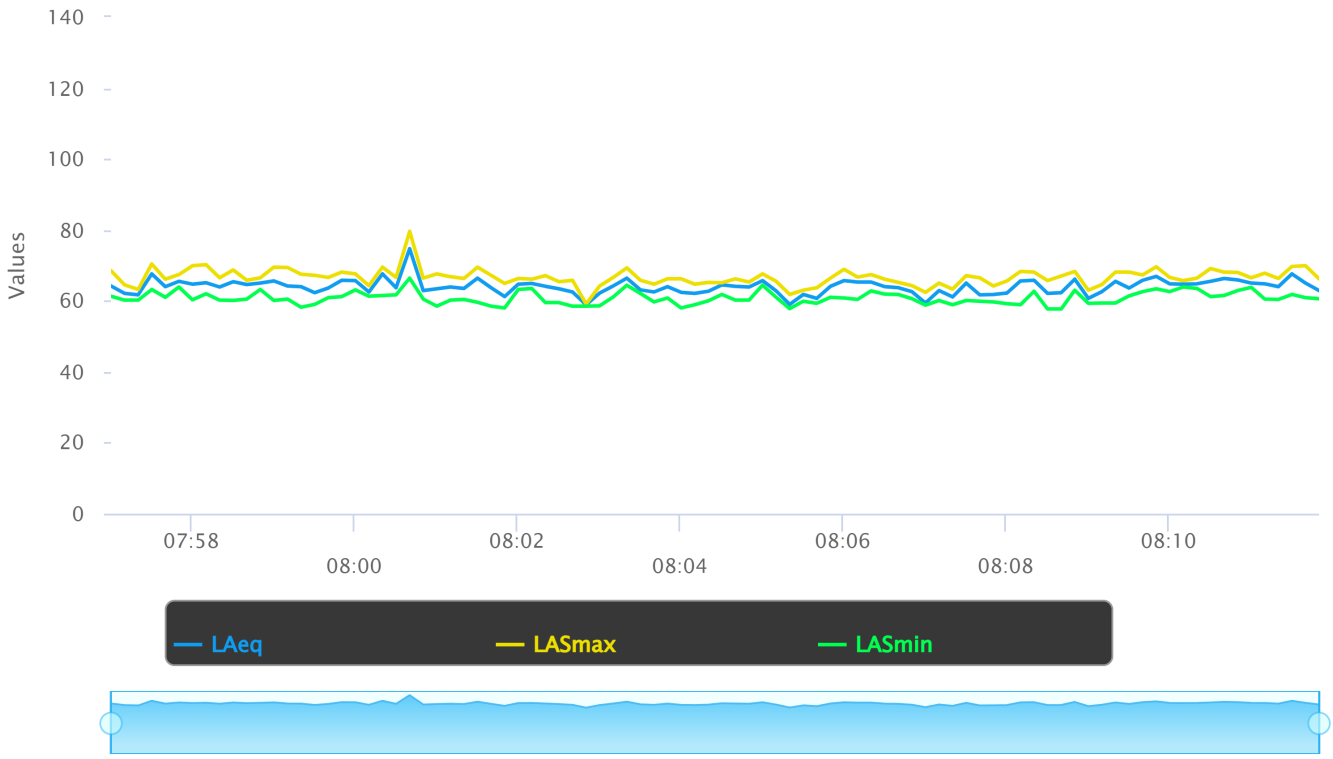
Overloads

Count	Duration	OBA Count	OBA Duration
0	0:00:00.0	0	0:00:00.0

Statistics

LAS 0.0	--- dB
LAS 0.0	--- dB
LAS 10.0	67.0 dB
LAS 33.3	64.8 dB
LAS 66.7	62.2 dB
LAS 90.0	59.7 dB

Time History



NOISE MONITORING FIELD REPORT

Project Name: 1323 Great Mall Drive Project

Monitoring Location: Northwest Project Site

Date: 12/14/23 Site Number: 3

Measured By: Annalie Sarrieddine

Measurement Start Time: 8:16 AM

Measurement End Time: 8:31 AM

Total Measurement Time: 15 min.

Noise Meter Model: Larson Davis Soundtrack LxT Calibration: 94.0 (dBA)

Meter Setting: A-Weighted Sound Level (SLOW)

Session File Name: LxT. Data .300s

Primary Noise Sources: Vehicle traffic, train

Site Map

Data Summary

Noise Scale	Noise Level (dBA)
L_{eq}	63.8
L_{max}	79.3
L_{min}	59.0

Other Noise Sources During Monitoring

1. _____ Time: _____
2. _____ Time: _____
3. _____ Time: _____
4. _____ Time: _____
5. _____ Time: _____

Additional Notes:

IMPACT SCIENCES

Measurement Report

Report Summary

Meter's File Name	LxT_Data.300.s	Computer's File Name	LxT_0005667-20231214 081653-LxT_Data.300.ldbin
Meter	LxT1 0005667	Firmware	2.302
User		Location	
Job Description			
Note			

Start Time	2023-12-14 08:16:53	Duration	0:15:00.0		
End Time	2023-12-14 08:31:53	Run Time	0:15:00.0	Pause Time	0:00:00.0
Pre-Calibration	2023-12-14 07:16:27	Post-Calibration	None	Calibration Deviation	---

Results

Overall Metrics

LA_{eq}	63.8 dB		
LAE	93.3 dB	SEA	--- dB
EA	239.9 µPa²h		
EA8	7.7 mPa²h		
EA40	38.4 mPa²h		
LA_{peak}	91.2 dB	2023-12-14 08:20:14	
LAS_{max}	79.3 dB	2023-12-14 08:20:14	
LAS_{min}	59.0 dB	2023-12-14 08:24:26	
LA_{eq}	63.8 dB		
LC_{eq}	74.1 dB	LC_{eq} - LA_{eq}	10.3 dB
LAI_{eq}	64.6 dB	LAI_{eq} - LA_{eq}	0.8 dB

Exceedances

	Count	Duration
LAS > 85.0 dB	0	0:00:00.0
LAS > 115.0 dB	0	0:00:00.0
LApk > 135.0 dB	0	0:00:00.0
LApk > 137.0 dB	0	0:00:00.0
LApk > 140.0 dB	0	0:00:00.0

Community Noise

L_{DN}	L_{Day}	L_{Night}
--- dB	--- dB	0.0 dB

L_{DEN}	L_{Day}	L_{Eve}	L_{Night}
--- dB	--- dB	--- dB	--- dB

Any Data

	A		C		Z	
	Level	Time Stamp	Level	Time Stamp	Level	Time Stamp
L_{eq}	63.8 dB		74.1 dB		--- dB	
$LS_{(max)}$	79.3 dB	2023-12-14 08:20:14	--- dB	None	--- dB	None
$LS_{(min)}$	59.0 dB	2023-12-14 08:24:26	--- dB	None	--- dB	None
$L_{Peak(max)}$	91.2 dB	2023-12-14 08:20:14	--- dB	None	--- dB	None

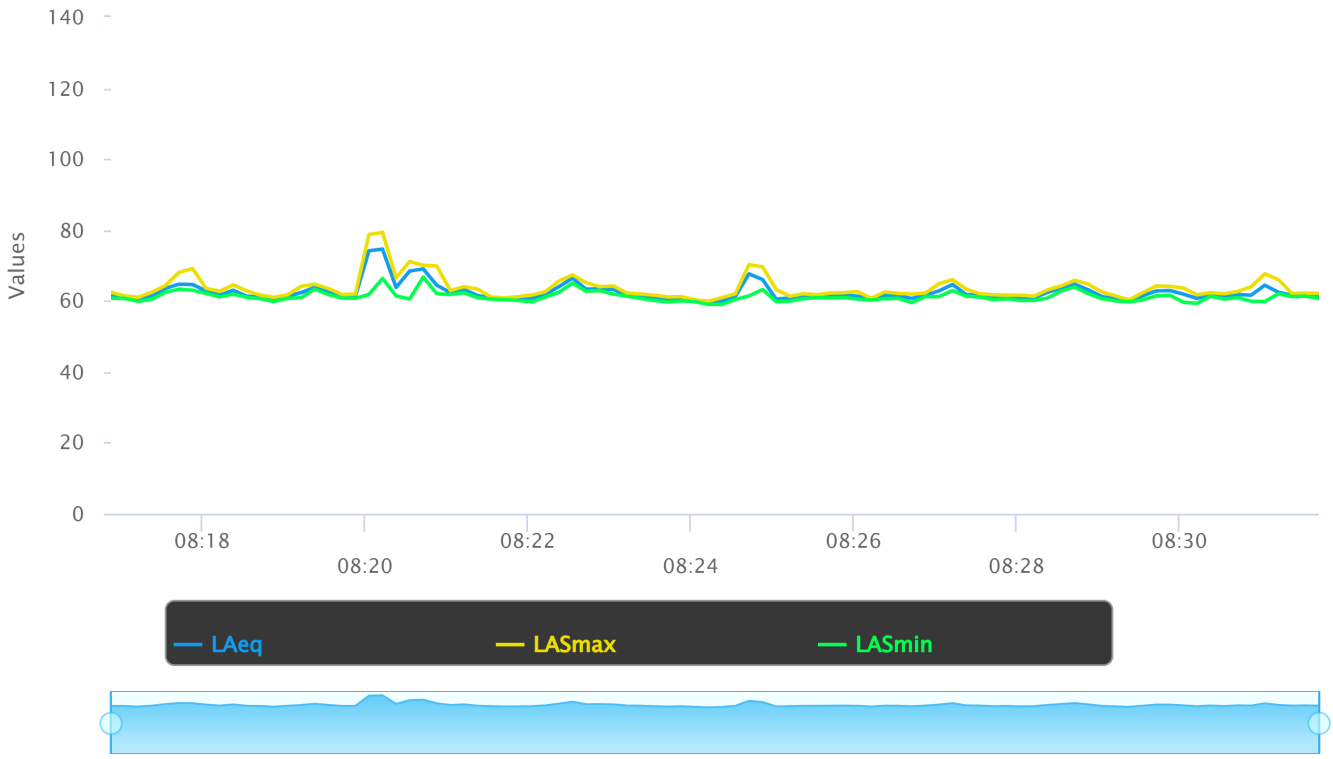
Overloads

Count	Duration	OBA Count	OBA Duration
0	0:00:00.0	0	0:00:00.0

Statistics

LAS 0.0	--- dB
LAS 0.0	--- dB
LAS 10.0	64.5 dB
LAS 33.3	62.2 dB
LAS 66.7	61.1 dB
LAS 90.0	60.3 dB

Time History



NOISE MONITORING FIELD REPORT

Project Name: 1323 Great Mall Drive Project

Monitoring Location: Centre Point Dr. Apartments

Date: 12/14/23 Site Number: 4

Measured By: Annalie Sarrieddine

Measurement Start Time: 8:44 AM

Measurement End Time: 8:59 AM

Total Measurement Time: 15 min.

Noise Meter Model: Larson Davis Soundtrack LxT Calibration: 94.0 (dBA)

Meter Setting: A-Weighted Sound Level (SLOW)

Session File Name: LxT_Data.301s

Primary Noise Sources: Neighborhood Activity, Vehicle Traffic

Site Map

Data Summary

Noise Scale	Noise Level (dBA)
L_{eq}	63.7
L_{max}	77.8
L_{min}	57.9

Other Noise Sources During Monitoring

1. _____ Time: _____
2. _____ Time: _____
3. _____ Time: _____
4. _____ Time: _____
5. _____ Time: _____

Additional Notes:

Neighborhood Activity includes people walking, dogs, talking on the phone, cars parking, doors opening and closing

IMPACT SCIENCES

Measurement Report

Report Summary

Meter's File Name	LxT_Data.301.s	Computer's File Name	LxT_0005667-20231214 084429-LxT_Data.301.ldbin
Meter	LxT1 0005667	Firmware	2.302
User		Location	
Job Description			
Note			

Start Time	2023-12-14 08:44:29	Duration	0:15:00.0		
End Time	2023-12-14 08:59:29	Run Time	0:15:00.0	Pause Time	0:00:00.0
Pre-Calibration	2023-12-14 07:16:27	Post-Calibration	None	Calibration Deviation	---

Results

Overall Metrics

LA_{eq}	63.7 dB		
LAE	93.2 dB	SEA	--- dB
EA	234.4 µPa²h		
EA8	7.5 mPa²h		
EA40	37.5 mPa²h		
LA_{peak}	94.6 dB	2023-12-14 08:51:40	
LAS_{max}	77.8 dB	2023-12-14 08:54:10	
LAS_{min}	51.9 dB	2023-12-14 08:58:08	
LA_{eq}	63.7 dB		
LC_{eq}	70.5 dB	LC_{eq} - LA_{eq}	6.8 dB
LAI_{eq}	66.1 dB	LAI_{eq} - LA_{eq}	2.4 dB

Exceedances

	Count	Duration
LAS > 85.0 dB	0	0:00:00.0
LAS > 115.0 dB	0	0:00:00.0
LApk > 135.0 dB	0	0:00:00.0
LApk > 137.0 dB	0	0:00:00.0
LApk > 140.0 dB	0	0:00:00.0

Community Noise

L_{DN}	L_{Day}	L_{Night}
--- dB	--- dB	0.0 dB

L_{DEN}	L_{Day}	L_{Eve}	L_{Night}
--- dB	--- dB	--- dB	--- dB

Any Data

	A		C		Z	
	Level	Time Stamp	Level	Time Stamp	Level	Time Stamp
L_{eq}	63.7 dB		70.5 dB		--- dB	
$LS_{(max)}$	77.8 dB	2023-12-14 08:54:10	--- dB	None	--- dB	None
$LS_{(min)}$	51.9 dB	2023-12-14 08:58:08	--- dB	None	--- dB	None
$L_{Peak(max)}$	94.6 dB	2023-12-14 08:51:40	--- dB	None	--- dB	None

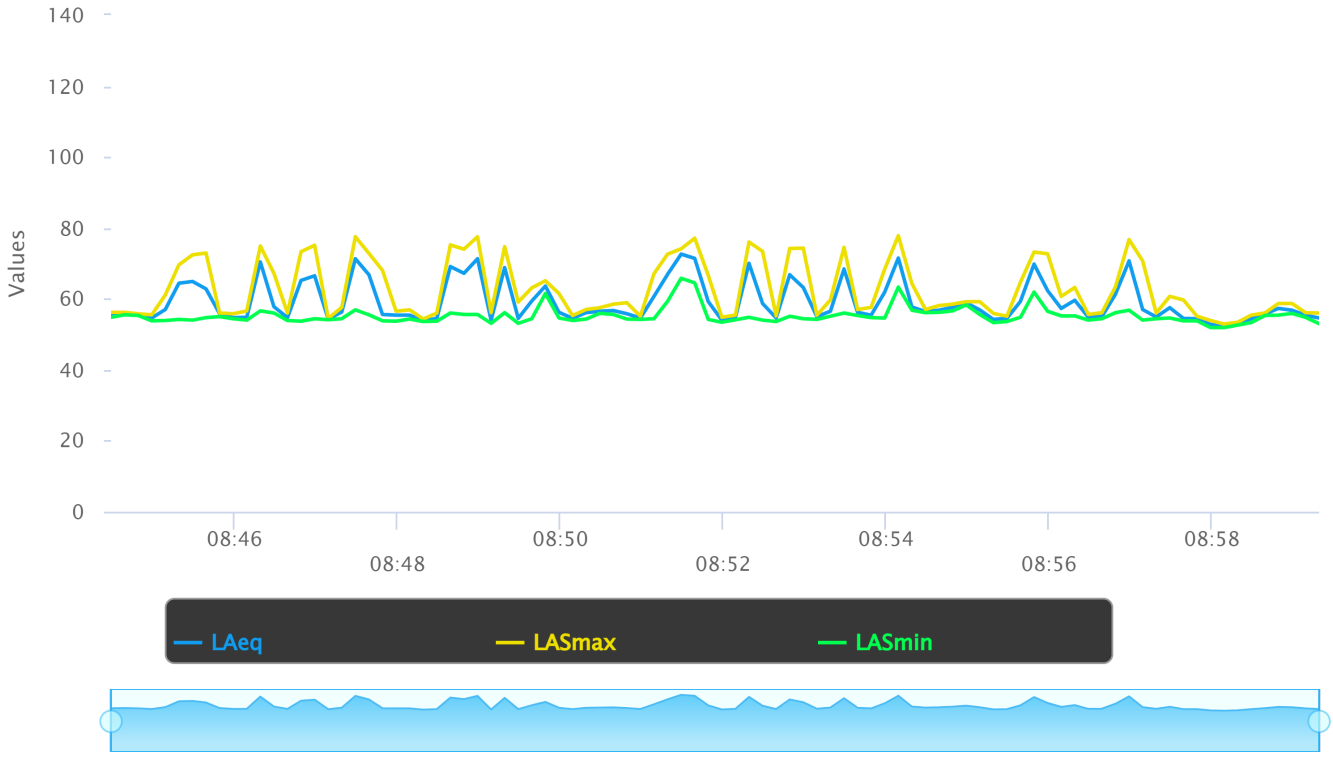
Overloads

Count	Duration	OBA Count	OBA Duration
0	0:00:00.0	0	0:00:00.0

Statistics

LAS 0.0	--- dB
LAS 0.0	--- dB
LAS 10.0	66.8 dB
LAS 33.3	57.1 dB
LAS 66.7	55.0 dB
LAS 90.0	54.0 dB

Time History



Project Site Noise Level (Ldn) (Location 1)		
Hour of Day	**dBA Leq**	**With Ldn Penalty**
12:00 AM	66.1	76.1
1:00 AM	66.1	76.1
2:00 AM	66.1	76.1
3:00 AM	66.1	76.1
4:00 AM	66.1	76.1
5:00 AM	66.1	76.1
6:00 AM	66.1	76.1
7:00 AM	66.1	66.1
8:00 AM	66.1	66.1
9:00 AM	66.1	66.1
10:00 AM	66.1	66.1
11:00 AM	66.1	66.1
12:00 PM	66.1	66.1
1:00 PM	66.1	66.1
2:00 PM	66.1	66.1
3:00 PM	66.1	66.1
4:00 PM	66.1	66.1
5:00 PM	66.1	66.1
6:00 PM	66.1	66.1
7:00 PM	66.1	66.1
8:00 PM	66.1	66.1
9:00 PM	66.1	66.1
10:00 PM	66.1	76.1
11:00 PM	66.1	76.1
	Calculated Ldn:	**72.5**

Daytime Hours:	7:00 AM - 10:00 PM
Nighttime Hours:	10:00 PM - 7:00 AM

Note: Ldn based on measurement data collected at Location 1. See noise monitoring data.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 1/30/2024
Case Description: 1323 Great Mall Drive Project (Construction)

---- Receptor #1 ----

		Baselines (dBA)		
Description	Land Use	Daytime	Evening	Night
Centre Pointe Dr Apartments	Residential	60	60	60

Description	Impact Device	Usage(%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Tractor	No	40	84		511	0
Crane	No	16		80.6	511	0

Results

	Calculated (dBA)	
Equipment	*Lmax	Leq
Tractor	63.8	59.8
Crane	60.4	52.4
Total	63.8	60.6

*Calculated Lmax is the Loudest value.

---- Receptor #2 ----

		Baselines (dBA)		
Description	Land Use	Daytime	Evening	Night
Capitol Apartments	Residential	60	60	60

Description	Impact Device	Usage(%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Tractor	No	40	84		645	0
Crane	No	16		80.6	645	0

Results

	Calculated (dBA)	
Equipment	*Lmax	Leq
Tractor	61.8	57.8
Crane	58.3	50.4
Total	61.8	58.5

*Calculated Lmax is the Loudest value.

---- Receptor #3 ----

		Baselines (dBA)		
Description	Land Use	Daytime	Evening	Night
Under Construction Apartments	Residential	60	60	60

Description	Impact Device	Usage(%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Tractor	No	40	84		551	0
Crane	No	16		80.6	551	0

Results

	Calculated (dBA)	
Equipment	*Lmax	Leq
Tractor	63.2	59.2
Crane	59.7	51.7
Total	63.2	59.9

*Calculated Lmax is the Loudest value.

---- Receptor #4 ----

		Baselines (dBA)		
Description	Land Use	Daytime	Evening	Night
Existing Stratford School	Commercial	60	60	60

Description	Impact Device	Usage(%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Tractor	No	40	84		165	0
Crane	No	16		80.6	165	0

Results

	Calculated (dBA)	
Equipment	*Lmax	Leq
Tractor	73.6	69.7
Crane	70.2	62.2
Total	73.6	70.4

*Calculated Lmax is the Loudest value.

Roadway Construction Noise Model (RCNM),Version 1.1

Report date: 1/30/2024
Case Description: 1323 Great Mall Drive Project (Demo)

---- Receptor #1 ----

Description	Land Use	Baselines (dBA) Daytime	Evening	Night
Centre Pointe Dr Apartments	Residential	60	60	60

Description	Impact Device	Usage(%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Concrete Saw	No	20		89.6	511	0
Crane	No	16		80.6	511	0

Results

Calculated (dBA)

Equipment	*Lmax	Leq
Concrete Saw	63.8	59.8
Crane	60.4	52.4
Total	63.8	60.6

*Calculated Lmax is the Loudest value.

---- Receptor #2 ----

Description	Land Use	Baselines (dBA) Daytime	Evening	Night
Capitol Apartments	Residential	60	60	60

Description	Impact Device	Usage(%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Concrete Saw	No	20		89.6	645	0
Crane	No	16		80.6	645	0

Results

Calculated (dBA)

Equipment	*Lmax	Leq
Concrete Saw	61.8	57.8
Crane	58.3	50.4
Total	61.8	58.5

*Calculated Lmax is the Loudest value.

---- Receptor #3 ----

Description	Land Use	Baselines (dBA) Daytime	Evening	Night
Under Construction Apartments	Residential	60	60	60

Description	Impact Device	Usage(%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Concrete Saw	No	20		89.6	551	0
Crane	No	16		80.6	551	0

Results

Calculated (dBA)

Equipment	*Lmax	Leq
Concrete Saw	68.7	61.7
Crane	59.7	51.7
Total	68.7	62.2

*Calculated Lmax is the Loudest value.

---- Receptor #4 ----

Description	Land Use	Baselines (dBA) Daytime	Evening	Night
Existing Stratford School	Commercial	60	60	60

Description	Impact Device	Usage(%)	Equipment Spec Lmax (dBA)	Actual Lmax (dBA)	Receptor Distance (feet)	Estimated Shielding (dBA)
Concrete Saw	No	20		89.6	165	0
Crane	No	16		80.6	165	0

Results

Calculated (dBA)

Equipment	*Lmax	Leq
Concrete Saw	79.2	72.2
Crane	70.2	62.2
Total	79.2	72.6

*Calculated Lmax is the Loudest value.

TRAFFIC NOISE LEVELS

Project Name: 1323 Great Mall Drive Milpitas

Background Information

Model Description:	FHWA Highway Noise Prediction Model with California Vehicle Noise (CALVENO) Emission Levels.
Analysis Scenario(s):	Existing, Existing Plus Project
Source of Traffic Volumes:	Transportation Analysis (1323 Great Mall, Hexagon Transportation Consultants, January 8, 2024)
Community Noise Descriptor:	X

Assumed 24-Hour Traffic Distribution:	(Ldn) Day	Evening	(CNEL) Night
Total ADT Volumes	77.70%	12.70%	9.60%
Medium-Duty Trucks	87.43%	5.05%	7.52%
Heavy-Duty Trucks	89.10%	2.84%	8.06%

Traffic Noise Levels

Analysis Condition Roadway Name Roadway Segment	Lanes	Median Width	Peak Hour Volume	ADT Volume	Design Speed (mph)	Dist. from Center to Receptor[1]	Alpha Factor	Barrier Attn. dB(A)	Vehicle Mix: Medium Trucks	Vehicle Mix: Heavy Trucks	Peak Hour dB(A) L_{eq}	24-Hour dB(A) Ldn
Existing Traffic Noise												
Falcon Drive												
Between Montague Exp and Site Driveway	2	10	903	9,030	25	50	0	0	1.8%	0.7%	62.2	61.0
Between Site Driveway and Great Mall Drive	2	10	903	9,030	25	50	0	0	1.8%	0.7%	62.2	61.0
Great Mall Drive												
Between Mustang Drive and Site Driveway	2	0	702	7,015	25	50	0	0	1.8%	0.7%	61.0	59.9
Between Site Driveway and Falcon Drive	2	0	697	6,970	25	50	0	0	1.8%	0.7%	61.0	59.8
Existing Plus Project Traffic Noise												
Falcon Drive												
Between Montague Exp and Site Driveway	2	10	1,068	10,680	25	50	0	0	1.8%	0.7%	62.9	61.8
Between Site Driveway and Great Mall Drive	2	10	1,226	12,260	25	50	0	0	1.8%	0.7%	63.5	62.4
Great Mall Drive												
Between Mustang Drive and Site Driveway	2	0	1,197	11,965	25	50	0	0	1.8%	0.7%	63.3	62.2
Between Site Driveway and Falcon Drive	2	0	1,020	10,200	25	50	0	0	1.8%	0.7%	62.6	61.5

1 Distance in feet from the roadway centerline to nearest receptor location.

APPENDIX D

Transportation Impact Analysis

Hexagon Transportation Consultants, Inc.

Memorandum

Date: May 28, 2024

To: Mr. Roberto Alanzo, City of Milpitas

From: Brett Walinski
Trisha Dudala

Subject: Transportation CEQA Analysis for the Stratford Preparatory School at 1323 Great Mall Drive in Milpitas, California

The purpose of this report is to analyze the transportation-related impacts of the proposed Stratford School located at 1323 Great Mall Drive in Milpitas, California, as required by the California Environmental Quality Act (CEQA). The project proposes a new preparatory school for 500 students in grades 6 to 12 to be located on the site of an existing office building. The site is located just north of the existing Stratford school with grades pre-kindergarden to 8. The project would renovate the existing 51,740 square-foot office building for school use and modify the existing site, which currently consists mostly of paved surface parking areas, into a campus with 14,965 square feet of synthetic turf (play field) and a new gym building of 7,883 square feet. Initial enrollment for the proposed school may begin in grades 6 to 12 with the intent to transition to Grades 9 to 12.

It is also an in-fill project and further completes the urban fabric of the city without requiring the expansion of services to unincorporated areas. The project falls within the boundaries of the recently adopted Milpitas Metro Specific Plan (MMSP) and is within the Great Mall District sub-area. Its land use classification in the MMSP is “Business Park Research & Development Limited Residential (BPRD-R).” The BPRD-R land use classification specifically identifies “educational uses” as allowed uses.

The implementation section of the MMSP states that “Property owners in the Great Mall District have expressed interest in developing a mix of land uses that may occur over time rather than immediately. The plan aims to be responsive to developer needs while ensuring that the development of the parcel results in a high-quality, well-integrated, pedestrian-accessible urban node.”

This report includes an analysis of Vehicle Miles Travelled (VMT); potential impacts to pedestrian, bicycle and transit facilities; and emergency access.

VMT Analysis

Senate Bill 743 (SB 743) requires local jurisdictions to use Vehicle Miles Traveled (VMT) instead of Level of Service (LOS) to analyze transportation impacts under the California Environmental Quality Act (CEQA). City staff developed a new citywide VMT policy to comply with State law and provide established criteria for analyzing transportation impacts of development projects and long-range plans. The Milpitas City Council adopted the VMT policy on May 18, 2021, which establishes VMT as the methodology for measuring potential transportation environmental impacts and provides significance thresholds for CEQA analysis of future projects. The VMT policy aligns with the goals

and policies of the General Plan and adopted plans, and supports new development in suitable areas near transit, mixed-use neighborhoods, and other amenities.

VMT Policy

According to the City VMT policy, projects shall be presumed to have a less-than-significant transportation impact if they meet any of the following screening criteria:

- Projects generating 110 daily trips or less. Examples are single-family residential development of 12 units or fewer, multi-family residential development of 20 units or fewer, and office developments of 10,000 square feet or less.
- Retail projects that are local serving defined as 100,000 square feet or less.
- Local serving public projects such as fire stations, neighborhood parks, libraries, and community centers.
- All land use projects located within one-half mile of a major transit stop, or a stop along a high-quality transit corridor (pursuant to State definitions for such facilities) and meet the following criteria:
    - A minimum floor area ratio of 0.75; or for residential projects, a minimum density of 35 units/acre (40 units/acre in the Serra Center and 50 units/acre in the Milpitas Metro Specific Plan area).
    - The project does not include more parking than required by City Code for use by residents, customers, or employees.
    - The project does not replace affordable residential units with a smaller number of affordable units, and any replacement units are at the same levels of affordability.
    - The project is consistent with the applicable Sustainable Communities Strategy (SCS).
- Projects with restricted affordable housing (as described in the policy).

In addition, the City policy establishes the following:

- The Santa Clara County areawide average VMT shall be the regional baseline.
- For residential, office and industrial projects, a project will have a less than significant impact if the project results in a 15% VMT reduction compared to the baseline. For industrial projects, the 15% threshold applies to the employee commute trip only.
- Retail projects which result in a net increase in total VMT shall constitute a significant impact; however, retail projects determined by the city to be local serving are exempt from VMT analysis. In all cases, retail projects larger than 100,000 square feet may be considered regional-serving and would be subject to the retail threshold of significance.
- Each land use within a mixed-use project, and all other project types, shall be evaluated independently by applying the most appropriate threshold of significance to each land use type being proposed.

- Projects that are currently approved will not require any supplemental VMT environmental review unless the "Project" requires supplemental environmental review not covered by an addendum.

- For projects such as regional retail, hospitals, stadium, sports complexes, or schools not regulated by a public-school district or that require permits from local jurisdiction, a net increase in total VMT may indicate a significant transportation impact.

The City VMT policy does not directly address how redevelopment projects are to be treated. The State criteria does. The state guidance is as follows: "*Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact.*"

Project VMT Screening

The proposed school project could potentially be screened out based on the "Local Serving" and "Prior Approvals" criteria as described below.

Local Serving

The project would be less than 100,000 square feet and its trip generation characteristics would be similar to local-serving retail. Based on data provided by the project applicant, approximately 80% of the student population would reside within 5-miles of the project site. The Governor's Office of Planning and Research (OPR) *Technical Advisory* dated December 2018 states that "By adding retail opportunities into the urban fabric and thereby improving retail destination proximity, local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than-significant transportation impact." School uses are similar to retail uses, in that, the more schools that are located within in a given area, the shorter the student trips between the school and other complementary land uses (such as employment or residential uses). Student trips to and from schools are analogous to customer trips to and from retail uses. Both land uses (retail and schools) are supported by growth in employment and housing, which are the main drivers of trip-making activity. Thus, applying the same reasoning OPR uses for retail projects, the proposed school could be screened-out based on the local-serving criteria. A similar finding was reached by the City of Milpitas for the proposed Stratford School located at 125 North Milpitas Boulevard, which was screened using local serving criteria. However, the supporting analysis for this finding was prepared in April of 2021, which pre-dates the adoption of the City's formal VMT policy. Although there is reasonable evidence to support a finding that the project could be screened out based on current City policy, a detailed analysis of the VMT generated by the project was prepared to confirm this finding.

Prior Approvals

The Milpitas Metro Specific Plan Project (MMSP) supplemental Environmental Impact Report (SEIR) was prepared in April, 2022. The MMSP is a long-term planning document that updates the original 2008 Milpitas Transit Area Specific Plan (TASP) and vision for the area. The changes between the TASP and MMSP included:

1. Expansion of the original 437-acre TASP Plan Area by approximately 73 additional acres, for a total of 510 acres, in order to facilitate the development of an Innovation District east of the Milpitas Transit Center and to promote opportunities for housing development along South Main Street. In addition, the Metro Plan redefines the five Districts, such that they are

bounded by major streets and include a mix of land uses, development densities, parks, street grids, and pedestrian connections.
2. Changes to the land use classifications and policies.
3. Additional residential and non-residential density, and related population and employment growth.
4. Extension of the Metro Plan horizon year by 10 years (from 2030 to 2040), compared to the TASP.

The current zoning for the project site is C2 Commercial, which will be updated with the adoption of the Phase 1 Zoning Code update to establish BPRD Zoning Districts. The proposed project is located within the MMSP area and its land use designation is BPRD-R (Business Park R&D, Limited Residential). This land use classification supports research and development activities, offices, high tech, hotels, retail services, and education uses.

The proposed educational use was contemplated as a potential development on the project site in the MMSP and therefore its CEQA impacts have been addressed in the MMSP EIR which was prepared as a supplemental EIR to the TASP. Although the Metro Plan would result in an increase in VMT compared to the TASP because of more intensive development, the MMSP draft SEIR concluded that the Metro Plan (2040 Cumulative Plus Project) scenario is estimated to substantially lower VMT per service population, per capita, and per employee relative to both the 2040 Santa Clara countywide average and the Milpitas 2040 General Plan (2040 Cumulative No Project) scenario.

Individual projects consistent with the MMSP may qualify for a statutory exemption under CEQA. Once consistency is determined, no additional CEQA review is required though projects will still need to be reviewed by the City's Engineering and Planning Departments for non-CEQA related site-specific measures.

The MMSP envisions continued investments in essential infrastructure, including mobility/transportation to serve new development. Investments in new infrastructure and improvements expected to serve the MMSP are expected to be primarily funded through:

1. The Transit Area Development Impact Fee (TADIF) – The TADIF will continue to be levied upon new development within the MMSP area to ensure that new development pays its appropriate and proportionate share of new infrastructure and other improvements.

2. Citywide Fees/Exactions – New and existing infrastructure investments will serve new development in both the Milpitas Metro Specific Plan and other areas of the city. This could include new public safety facilities. A portion of the new funding for these improvements will likely come from other city funding sources, including fees on new development outside of the Milpitas Metro Specific Plan.

3. Grants – The City has successfully pursued grant funding for a range of improvements since TASP adoption. Grant funding helps cover potions of new public infrastructure and improvement costs that cannot be allocated to new development.

The Milpitas Metro Specific Plan requires all new development projects to implement a travel demand management program (TDM), with a goal of reducing VMT by 15 percent or more below the regional baseline per employee or per resident and efficiently provide parking that meets the needs of employees and visitors. TDM is typically categorized as a set of strategies aimed at

encouraging transit use, walking, biking, and carpooling while reducing single occupant vehicle trips, vehicle miles traveled, and parking demand. Possible TDM measures for the proposed project include:

- Marketing/education
- Provision of bicycle parking spaces
- Fully subsidized transit passes (e. g. VTA, BART, Caltrain). At a minimum the transit subsidy should be equivalent to the cost of a monthly VTA pass
- Carpooling

Although the project use was previously included in the MMSP and prior CEQA documentation, this report includes a detailed analysis of Vehicle Miles Travelled (VMT) to ensure the project would not create additional impacts over and above what has previously been identified.

Detailed VMT Analysis

The detailed VMT analysis must consider the trip-making activity of the employment component of the project (school staff), the students, as well as the VMT generated by the existing office use it would replace. This is described in the following sections.

School Employee VMT Analysis

Because school employees would have similar trip-making characteristics (origin/destination and length of trips) as typical office employees, the total employee VMT for the existing office building was compared to the total employee VMT for the proposed Stratford school (see Table 1). Valley Transportation Authority (VTA) Travel Demand Forecast (TDF) model assumptions were used to estimate the number of employees that could be expected to occupy the existing vacant office use. The conversion rate from office square footage to employees was 3.3 jobs per 1,000 square feet. Thus, for an office building size of 51,740 square feet, approximately 170 employees could be expected. Based on the Santa Clara County VMT Estimation Tool, the VMT per employee for the zone within which the project is located would be 15.5. The total employee VMT for the existing office building would therefore be 2,635 (170 x 15.5). The proposed school is expected to have a maximum of 75 employees on any given day. Using a VMT per employee of 15.5, the proposed project would generate a total employee VMT of 1,163 (75 x 15.5), which would be less than the total employee VMT for the existing office building. Thus, the proposed project would result in a decrease in the total employee VMT from the site.

Table 1
Employee VMT Analysis

	# of Employees	VMT/ Employee [3]	Total Employee VMT
Existing Office [1]	170	15.5	2,635
Proposed Stratford School [2]	75	15.5	1,163
Difference			-1,473

Notes:

[1] Based on the VTA Travel Demand Model, 3.3 jobs per 1,000 sq. ft. was assumed.

[2] Based on information provided by Stratford School.

[3] Based on Santa Clara County VMT Estimation Tool, for the zone that the project is located in.

Student VMT Analysis

For common land uses such as residential, employment, and retail, quantitative methods are frequently used to determine VMT. However, for unique land uses for which models are not readily available, such as private schools, OPR guidelines allow for qualitative analysis of VMT impacts. This section evaluates, qualitatively, whether the proposed school would increase the travel distances of students, given the relative location of complementary land uses and other Stratford schools in the area.

There are currently three Stratford schools in Milpitas. These lower division schools are all located less than 3 miles from the proposed Stratford high school, including:

- 341 Great Mall Parkway - grades pre-kindergarten to 8th
- 25 Corning Avenue - grades kindergarten to 5th
- 125 N Milpitas Boulevard - grades preschool to 2nd

Based on the analysis of student zip code data provided by Stratford for students currently enrolled in all of the Milpitas Stratford Schools (Pre-K to 8th grade, 1410 students including siblings), 80% of the students reside within a 5-mile distance and 92% of the students reside within a 10-mile distance from the proposed school. There is currently only one Stratford high school in the south bay region, and it is located at 3800 Blackford Avenue in San Jose. Thus, in the absence of the proposed Stratford High School in Milpitas, to continue their high school education at Stratford School, Milpitas Stratford students would attend the San Jose Blackford Avenue campus, that is located 11 to 15 miles from the proposed high school at 1323 Great Mall Drive. Stratford anticipates that the student population for the proposed high school at full enrollment will resemble the demographics of all pre-school to 8th grade students at the existing Milpitas campuses. By providing a high school in Milpitas in close proximity to the existing lower division Stratford schools, the project would shorten trips and reduce VMT by providing an opportunity for students to attend high school locally, instead of travelling to the neighborhood city. The proposed project would also result in shorter travel distances for students coming from Alum Rock and Fremont, which are all located within a 5-to-10-mile radius of the proposed project. Thus, lower grade students from these communities who wish to continue high school with Stratford would have shorter travel distances to the proposed high school at 1323 Great Mall Parkway compared to travelling to the San Jose Blackford Avenue campus. Furthermore, the project would be located in close proximity to the

Milpitas Transit Center, which provides access to BART, light rail, and several bus routes. Given that the project would primarily serve older, high school-age students, the proximity of these facilities would increase the probability of transit trips to and from the project site, further reducing VMT. Last, as previously mentioned, school uses are similar to retail uses, in that, the more private schools that are located in a given area, the shorter the student trips between the school and other complementary land uses (such as employment or residential uses). Schools are primarily supporting uses for residential and employment uses, which are the main drivers of trip-making activity. Thus, by providing additional private schools in accessible and centralized locations, the private school student VMT per capita could be expected to decrease.

VMT Conclusions

The proposed project meets two of the criteria outlined in the City VMT guidelines for project screening. First, the project would constitute a local serving use, as it would primarily serve the surrounding residents, act as a feeder school for existing Stratford schools within the City, and would be less than 100,000 square feet. This is consistent with a prior finding from the City that the Stratford Schol at 125 North Milpitas Boulevard was determined to be local serving. Second, the project is consistent with the approved land use for the site identified in the MMSP, which includes educational uses and was cleared environmentally by the City's MMSP SEIR. The transportation impacts of the MMSP have already been identified and mitigated to the extent feasible. The project would be required to implement a TDM program and other types of fees adopted by the City. Therefore, given the City's screening criteria, prior finding regarding private school projects, and that the use for the site is already cleared environmentally, the impacts of the project on VMT are considered *less than significant.*

Because the City guidelines state that school projects *may* require detailed analysis of VMT impacts, further analysis was conducted to confirm the results of the VMT screening assessment. The VMT impacts of the proposed project were evaluated in terms of its effects on staff and student VMT. For staff, the employment VMT from the site would be reduced by approximately 1,473 vehicle-miles per day relative to the existing use. For students, the proposed project would provide an alternate location for Stratford school students to continue their education without traveling to a more distant location, thus reducing VMT per capita at Stratford schools. This effect is similar to what occurs when local-serving retail projects are constructed, which are presumed to have a less than significant impact on VMT. Thus, the detailed VMT analysis supports the finding that project's overall impact to VMT is considered *less than significant.*

Pedestrians, Bicycles and Transit

Pedestrian Facilities

Sidewalks are provided on most of the roadways surrounding the project site. There are existing sidewalks on the east side of Great Mall Parkway, both sides of Mustang Drive, south side of Great Mall Drive, east side of Falcon Drive and the north side of Montague Expressway. The signalized intersections at Great Mall Parkway/Mustang Drive and Great Mall Parkway/Montague Expressway provide crosswalks, curb ramps, and pedestrian-actuated pedestrian-crossing phases on all approaches. The unsignalized intersections surrounding the project site have a marked crosswalk on at least one of the approaches. There is also an existing pedestrian pathway that runs parallel to and south of Mustang Drive along the northwestern boundary of the project site connecting Great Mall Parkway to Great Mall Drive. Although there is no existing sidewalk on the west side of Falcon Drive, there would be direct pedestrian connections between the project site and the nearby BART/LRT stations. The project would install a pedestrian/bike gate that would provide a direct link

for students to access the sidewalk along Great Mall Parkway, adjacent to the new artificial turf field, between the proposed school and the existing school to the south. Pedestrians and cyclists to/from the Great Mall/Main LRT station could access the project site via the existing sidewalk along the east side of Great Mall Parkway and the pedestrian bridge near South Main Street. Alternatively, they could access the South Milpitas LRT station via sidewalks on Great Mall Parkway and the at-grade signalized pedestrian crossing at South Milpitas Boulevard. Pedestrians and cyclists to/from the Milpitas BART station could access the project site via either the pedestrian bridge at Piper Drive and the sidewalk along the north side of Montague Expressway or use the signalized crosswalk across Montague Expressway at Great Mall Parkway. The preferred route to/from the BART station would be to use the pedestrian bridge near Piper Drive, as it would not require students to cross the busy signalized intersection of Great Mall Drive/Montague Expressway.

> **Recommendation:** The school should provide educational material to students and staff on safe routes to/from the LRT and BART stations, discouraging them from using the drive aisles of the existing school to the south and from jaywalking across Falcon Drive.

It is anticipated that the volume of pedestrians generated by the project would not exceed the carrying capacity of the existing sidewalks and crosswalks on streets surrounding the site. The project would not remove any pedestrian facilities, nor would it conflict with the City of Milpitas *Trail, Pedestrian and Bicycle Master Plan.* Accordingly, the project would have no significant impact on pedestrian facilities.

Bicycle Facilities

Near the project site, Class II bike lanes are located on both sides along Great Mall Parkway, McCandless Drive, and on South Milpitas Boulevard. The project would provide a total of 96 onsite bicycle parking spaces between the proposed project site and the existing Stratford school to the south, so that they can be used by students and staff of both schools. It is anticipated that the volume of cyclists generated by the project would not exceed the carrying capacity of the existing bike facilities surrounding the site. In addition, the project would not remove any bicycle facilities, nor would it conflict with the City's *Trail, Pedestrian and Bicycle Master Plan*. Thus, the project would have no significant impact on bicycle facilities.

Transit Facilities

The project would be located in close proximity to the Milpitas Transit Center, which provides access to BART, light rail, and several bus routes. Given that the project would primarily serve older, high school-age students, the project would generate some transit trips made by students and staff. However, the volume of transit trips generated by the project is not expected to exceed the carrying capacity of the existing transit services to the site. The project, by itself, would not require additional transit service to the area or improvements to existing transit service frequencies. Nor would the project preclude, modify, or otherwise affect existing or proposed transit projects or policies identified by the Valley Transportation Authority (VTA). Therefore, the proposed project would not create an adverse impact to transit services in the area.

Emergency Access

The proposed project would not reroute or change any of the City streets in its vicinity that would impact emergency vehicle access to properties in the area. In addition, the proposed project would maintain the site's existing driveways, which would accommodate emergency vehicles. Thus, the project would not result in a significant impact to emergency vehicle access.