



3001 El Camino Real Affordable Housing Project

Responses to Comments on the Draft Initial Study-Mitigated Negative Declaration

SCH# 2023020309

prepared by

City of Palo Alto

Planning and Community Environment Department

250 Hamilton Avenue

Palo Alto, California 94301

Contact: Claire Raybould, AICP, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.

449 15th Street, Suite 303

Oakland, California 94612

April 2023

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Environmental Scientists | Planners | Engineers

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1 Introduction

1.1 Purpose of the Response to Comments on the Draft IS-MND

This document contains responses to comments received on the Draft Initial Study-Mitigated Negative Declaration (Draft IS-MND) prepared for the proposed 3001 El Camino Real Affordable Housing (proposed project). The Draft IS-MND identifies the likely environmental consequences associated with development of the proposed project and recommends mitigation measures to reduce potentially significant impacts. This document, together with the Draft IS-MND, constitutes the Final IS-MND for the proposed project.

1.2 Environmental Review Process

Pursuant to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft IS-MND.

The Draft IS-MND and Notice of Intent to Adopt (NOI) were circulated for a 30-day public review period that began on February 13, 2023 and ended on March 15, 2023. The NOI was posted with the County Clerk, sent to the State Clearinghouse, mailed to State and local agencies, published in the local newspaper (the Post), and mailed to nearby addresses. The City of Palo Alto received three comment letters on the Draft IS-MND. Copies of written comments received during the comment period are included in Chapter 2 of this document.

1.3 Document Organization

This document consists of the following chapters:

- **Chapter 1: Introduction.** This chapter discusses the purpose and organization of this response to comments document and summarizes the environmental review process for the project.
- **Chapter 2: Written Comments and Responses.** This chapter contains reproductions of all comment letters received on the Draft IS-MND. A written response for each CEQA-related written comment received during the public review period is provided. Each response is keyed to the corresponding comment.
- **Chapter 3: Public Hearing Comments and Responses.** This chapter contains a summary of comments raised during the public hearing held on the Draft IS-MND (Architectural Review Board Hearing on March 2, 2023). A written response to CEQA-related comments received at the hearings is provided.
- **Chapter 4: Revisions to the Draft IS-MND.** Changes to the Draft IS-MND that have been made in response to the comments received or to otherwise provide clarity are contained in this chapter.

2 Comments and Responses

This chapter includes written comments received during the circulation of the Draft IS-MND prepared for the 3001 El Camino Real Affordable Housing Project, and responses to those comments.

The Draft IS-MND was circulated for a public review period that began on February 13, 2023 and ended on March 15, 2023. The City of Palo Alto received three comment letters on the Draft IS-MND. The commenters and the page number on which each commenter's letter appear are listed below.

Letter No. and Commenter		Page No.
1	Sandra Lockhart	3
2	Travis L. Flora, Santa Clara County Department of Environmental Health	9
3	Lola Torney, Transportation Planner III, Santa Clara Valley Transportation Authority	11

The comment letters and responses follow. The comment letters have been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

During the Draft IS-MND review period, the City solicited written public and agency comments on the Draft IS-MND pursuant to CEQA as well as verbal comments at the Architectural Review Board public hearing on March 2, 2023. Responses to environmental issues raised at these hearings are included in Chapter 3 following the written comments and responses.

In some cases, specific changes to the text of the Draft IS-MND have been made in response to comments received. In no case do these revisions result in a greater number of impacts or impacts of a substantially greater severity than those set forth in the Draft IS-MND. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined and deleted text is indicated with ~~strikeout~~. Page numbers correspond to the page numbers of the Draft IS-MND.

Comment Letter 1

2/26/23

Notes - for/from Mitigated Negative Declaration
TO: Claire Raybould

Public hearing March 2 at the Architectural Review Board, 8:30 am, Grnd Floor oc City Center
Submit written comments before Mar 15 5:00 pm
Mail to Claire Raybould 250 Hamilton Ave 5th Floor, Palo Alto, 94301

Initial Study

1 6. Comprehensive Plan Designation: The zoned area is Service Commercial. This zoning served Palo Alto for many many years. Then the businesses were slowly forced out. Now we need to go to Mountain View or Redwood City to accomplish what these businesses provided. Putting in multiple family housing increases the number of people into this area without businesses to support those people and to say that service commercial is not appropriate is not fair. It's time to think outside the box. As it stands, where, then, is pedestrian oriented shopping areas? Why doesn't this project provide some of that for the 400 people who will be living there?

2 This project is introducing too many people to our R-1 zoned neighborhood. The density is 113 units per acre. None of the projects shown to us on paper, by this developer, comes close to that density. I also see a huge play area and a community room (Metropolitan Apartments) adjacent to the play area. The Metropolitan Apts has a density of 36 units per acre while 3001 El Camino has 129 proposed units on acreage of 1.14 with an insufficient amount of outdoor space for children.

Comment: Too many people in this limited space. No service infrastructure such as a deli, a little grocery store, coffee shop, small restaurant, a boutique. The plan is to get rid of what is nearby now with even more multi family development. There is NONE of this (service infrastructure) in the plan. Too many people, not enough services commercial to help those people live in place. No common sense.

Increased height – this allows for more people and less services.

3 No. 8 The project involves a Density Bonus; under the State's density bonus program it "provides" for reduced parking. Olive Ave is intended for over flow parking from the provided parking on the building site. This is a major disaster for Olive Ave. We are already providing parking for the business at the foot of Olive Ave. It is not every day but when everybody is onsite at that building – we counted 98 cars one day, they are parking on Olive. Suggestion: Assign a color code to Olive and Pepper, not to include El Camino, for permit parking. El Camino can have its own color code.

4 Figure 5: Set back of 5' is pathetic and a safety hazard at the corner of Olive and El Camino. This is not enough open space to see on-coming traffic on El Camino traveling north when coming out of Olive now. The proposed building is squared off on that corner. This is not an improvement. This is a dangerous situation. An open court would greatly improve the visibility and bring a pleasant ambiance to the building.

5 Common open space at s/w of site. This is a poor amount of space for the number of children likely to be living in this building (by their count it is 69). Once again this project is depending on sources outside their building site to accommodate its needs. I am told there will be a second floor community

5, | space. This is not fair to the children to take over the adult space for their play needs. Where now is
cont | the adult community seating space being relegated to.

6 | If Charities Housing cut back on the density of this building then some service commercial, more child
appropriate spaces, more parking within their own building, and a set back to make a more safe
crossing of El Camino Real at Olive could be done. But for the sake of numbers, the State and this
developer are willing to sacrifice safety, good health in the instance of the children, and inconvenience
to neighbors. This doesn't make good sense.

7 | I have commented on the possibility of the ingress/egress being on Acacia Street rather than Olive
Avenue. I have also commented on cars coming out of Acacia St. turning right, going 100 feet to the
left turn lane (already there) then making a U-turn at Olive or at the light at Page Mill will accomplish
going in a southerly direction.

We on Olive Avenue wish to slow down and eliminate additional traffic using Olive Ave as a
commuter cut off to Page Mill Rd. How to do this? Possibilities are:

- 1) Turn the building 180 degrees.
- 2) Put a barrier across half the street between 461 Olive and project building to deter traffic going in
an easterly on Olive (and not to block the driveway at Verizon on the other side of the street).
- 3) Make Ash St. a one-way street going from Page Mill Rd to Olive Ave.

8 | We on the south side of Olive Ave want to emphasize that ground water run off is properly drained
into culverts. We were heavily impacted when the parking lot in back of Fry's was constructed and on
the next heavy rain we were all flooded in our back yards. This drainage cannot be taken lightly and
must be engineered properly.

Very sincerely,

Sandra Lockhart
Peter Lockhart
405 Olive Avenue, Palo Alto, CA 94306
salockhart405@Yahoo.com

Letter 1

COMMENTER: Sandra Lockhart

DATE: February 26, 2023

Response 1.1

The commenter states that the project site is zoned Service Commercial and suggests that there is a lack of businesses in the area. The commenter states an opinion that the project is not appropriate for the Service Commercial zone and that the project should provide pedestrian-oriented shopping for the 400 new residents. These comments do not refer to or pertain to the analysis or conclusions of the Draft IS-MND.

As discussed in Section 11, *Land Use and Planning*, of the IS-MND, pursuant to PAMC Chapter 18.16, multi-family residential use is a permitted land use in the Service Commercial district and the project is consistent with requirements of the Service Commercial district. Additionally, since the project site is located in close proximity to a transit center (California Avenue Caltrain Station), multi-family housing, particularly higher density housing, is allowed and encouraged in this location under the Service Commercial Comprehensive Plan Land Use Designation. El Camino Real is a commercial corridor with a mix of uses including residential, retail, commercial, and office uses, and future residents would be able to utilize these services and businesses. Although the commenter's opinions regarding land uses at the site are noted, no changes to the IS-MND are required as a result of this comment.

Response 1.2

The commenter states an opinion that the project would introduce too many people to the R-1 zoned neighborhood and that the density of the proposed project is much higher than other projects. The commenter suggests that there is insufficient play space for children, that there are not enough services or business for current residents, and that the requested height increase would allow for too many people in the area with not enough service infrastructure. These comments do not refer to or pertain to the analysis or conclusions of the Draft IS-MND.

The proposed project site is located in the Service Commercial zone where multi-family residential development is permitted. Since the proposed project would include 100 percent affordable housing to very-low-income households, the project is eligible for four incentives and concessions. Specifically, the project applicant is requesting concessions for Floor Area Ratio (FAR), setbacks, site coverage and usable open space. The proposed project is also located in a Transit Priority Area, and therefore, separate from the concessions or waivers, the applicant is also eligible for a height increase of up to three additional stories, or 33 feet; unlimited density (Section 65915[f][3][d][ii]); and non-compliance with a minimum parking requirement (Section 65915[p][3]). Additionally, there is no density requirement for residential development along El Camino Real.

As discussed in Section 15, *Public Services*, of the IS-MND, the proposed project would not require the need for construction or substantial alteration of fire or police protection facilities, schools, or other public facilities such as water, wastewater, or stormwater facilities. In addition, as discussed in Section 16, *Recreation*, of the IS-MND, current parks and recreational facilities would be able to accommodate the increase in residents from the proposed project. Therefore, impacts to public services and recreation would be less than significant. No changes to the IS-MND are required as a result of this comment.

Response 1.3

The commenter expresses an opinion that there are not enough street parking spaces in the neighborhood, and that the proposed project would worsen street parking on Olive Avenue. The commenter recommends assigning a color code to Olive Avenue, Pepper Avenue, and El Camino Real for permit parking. These comments do not refer to or pertain to the analysis or conclusions of the Draft IS-MND.

The proposed project would provide 103 parking spaces including five ADA compliant spaces. Although this is 26 spaces fewer than the required parking in accordance with the PAMC, as discussed in Section 11, *Land Use and Planning*, of the IS-MND, the proposed project is located within 0.5 miles of a major transit stop and therefore is not required to comply with a minimum parking requirement (Government Code Section 65915[p][3]). Additionally, parking supply and demand is not required to be analyzed under CEQA and is no longer listed in CEQA Guidelines Appendix G as a topic to be analyzed. No changes to the IS-MND are required as a result of this comment.

Nevertheless, the municipal code sets forth a process for residents to initiate a residential preferential parking (RPP) district for their neighborhood. The process for forming an RPP District for a neighborhood through neighborhood petition is set forth in PAMC Section 10.50.050. The commenter may consider initiation of this process for the North Ventura neighborhood.

Response 1.4

The commenter states an opinion that a setback of 5 feet at the corner of Olive Avenue and El Camino Real would be a safety hazard as there is not enough open space to see on-coming traffic on El Camino Real traveling north when existing Olive Avenue. These comments do not refer to the analysis or conclusions of the Draft IS-MND.

As discussed in Section 11, *Land Use and Planning*, of the IS-MND, the proposed project is eligible for four incentives or concessions including modifications to setbacks. The applicant has requested a concession to allow for a reduced rear setback on Acacia Avenue from 10 feet to 5 feet on floors two through five, whereas the ground floor level would have an 8-foot setback. The ground floor of Olive Avenue would have a setback of 20 feet and El Camino Real would have an effective sidewalk width of 12 feet. Therefore, the project is set back much further than five feet from the property line at ground floor levels where line of sight for vehicles, pedestrians, or bicyclists could otherwise be obstructed. It should also be noted that the existing on-site buildings have a smaller setback from the corner of Olive Avenue and El Camino Real compared to the proposed development; therefore, the project would improve the existing condition with respect to building setbacks as it relates to visibility to on-coming traffic traveling North on El Camino Real.

Additionally, as discussed in Section 17, *Transportation*, of the IS-MND, the Transportation Analysis prepared by W-Trans found that sight distances along Olive Avenue at the project driveway would be adequate and would not increase hazards. According to the Transportation Analysis, the recommended sight distances for driveway approaches are based on stopping sight distance and use the approach travel speed as the basis for determining the recommended sight distance. Based on the posted speed limit of 25 miles per hour, the minimum stopping sight distance required is 150 feet. A review in the field shows that sight distances at the proposed project driveway on Olive Avenue exceed 150 feet and therefore are adequate. No changes to the IS-MND are required as a result of this comment.

Response 1.5

The commenter expresses an opinion that the project would not include enough open space to accommodate the number of children likely to be residing in the building. These comments do not refer to the analysis or conclusions of the Draft IS-MND.

As discussed in Section 11, *Land Use and Planning*, of the IS-MND, the proposed project is eligible for four incentives or concessions, including a reduction in usable open space. The applicant has requested a concession to allow for a change in the location of open space to allow for some of the common usable open space to be provided on the second-floor podium. The project would include communal gathering spaces in the building recesses, including a courtyard at the front of the building and at the back of the building. The project would also include a second-floor open space area at the second floor near single family residential uses. Open space areas include play areas for children, landscaping, and seating. Usable open space, when including both the ground floor and the second floor open spaces areas, would exceed City requirements. No changes to the IS-MND are required as a result of this comment.

Response 1.6

The commenter expresses an opinion that the proposed project should reduce building density, add more services and child appropriate spaces, as well as add more parking and a larger setback. These comments do not refer to the analysis or conclusions of the Draft IS-MND.

Please refer to responses 1.2, 1.4, and 1.5. No changes to the IS-MND are required as a result of this comment.

Response 1.7

The commenter recommends slowing down and eliminating additional traffic using Olive Avenue as a commuter cut off to Page Mill Road by turning the proposed building by 180 degrees (in order to provide vehicular access to the site from Acacia); putting a barrier across half the street between 461 Olive Avenue and the project building; and making Ash Street a one-way street going from Page Mill Road to Olive Avenue.

The proposed project generates trips associated with the proposed use, some of which may turn right out of the site to head eastbound on Olive Avenue to access Oregon Expressway. Based on trip distribution patterns, the number of trips that were assumed to travel eastbound instead of northbound, southbound, or westbound from the project site did not trigger analysis of the Ash Street/Olive Avenue or Park Boulevard/Olive Avenue intersections for analysis of consistency with the City's Local Transportation Analysis Policy. The Local Transportation Analysis (LTA) prepared by W-Trans is provided in Appendix A of the Draft IS-MND. These trips are not considered cut-through traffic. The project does not generate new cut-through traffic for commuters traveling from El Camino Real to Page Mill Road regardless of whether vehicular access is provided on Olive Avenue or Acacia Avenue. The comment is referring an existing condition. The City is currently proposing making Ash Street a one-way street going from Page Mill Road to Olive Avenue as part of the North Ventura Coordinated Area Plan (NVCAP) in order to address this existing concern regarding cut-through traffic.

The City further notes that in accordance with California Public Resources Code section 21099(b)(2) and CEQA Guidelines Section 15064.3, "a project's effect on automobile delay shall not constitute a significant environmental impact." Therefore, even though the project did not conflict with the City's LTA policy, inconsistency with the City's LTA Policy would not constitute an impact under

CEQA. Therefore, although the commenter's opinions in this regard are noted, no changes to the IS-MND for the proposed project are required as a result of this comment.

Response 1.8

The commenter expresses an opinion that drainage for the project must be engineered properly and that groundwater runoff is properly drained into culverts.

As discussed in Section 10, *Hydrology and Water Quality*, of the IS-MND, the project site is largely paved, and the proposed development would not introduce new paved areas to the extent that the rate or amount of surface runoff would substantially increase. The project site is connected to an existing stormwater drainage system located in the City of Palo Alto Matadero Creek Watershed. Stormwater runoff in the project area is currently flowing directly to Matadero Creek and eventually to the San Francisco Bay. The amount and direction of runoff would not substantially change due to the proposed project. The existing site contains 47,218 square feet of impervious surfaces and the project would decrease total impervious surfaces to 41,321 square feet, thereby reducing the amount of stormwater runoff. Additionally, the proposed project would be required to comply with the Santa Clara Valley Urban Runoff Pollution Prevention Program's C.3 requirements and would be designed to include three biotreatment ponds totaling 45,425 square feet, impervious rooftop space that directs runoff to the bio-swale, and impervious pavement draining to the bio-swale. Compliance with the municipal stormwater requirements would ensure that the project is engineered properly with respect to stormwater runoff. No changes to the IS-MND are required as a result of this comment.

Comment Letter 2

From: Flora, Travis <travis.flora@deh.sccgov.org>

Sent: Tuesday, February 14, 2023 4:02 PM

To: Raybould, Claire <Claire.Raybould@CityofPaloAlto.org>

Subject: RE: Notice of Intent to Adopt a Mitigated Negative Declaration 3001 El Camino Real

CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.

Hi Claire,

I took a brief look at the IS/MND file, and on document p.84/pdf p.89, the last paragraph of HAZ-1 states, "The SCCDEH closure and approval documents shall be delivered to and reviewed by the project applicant. The project applicant shall furnish copies of the completed reports and approval documents to the City Planning Department prior to issuance of grading permits."

My comment is that this paragraph reads to me like a DEH case closure letter might be required to be submitted to the City prior to issuance of grading permits, which is unlikely to occur. That paragraph includes two separate statements, so maybe they aren't necessarily related, but because they are back-to-back in the same paragraph, it could be interpreted that way.

Regards,

Travis L. Flora
(408) 918-3486

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Letter 2

COMMENTER: Travis L. Flora, Santa Clara County Department of Environmental Health

DATE: February 14, 2023

Response 2.1

The commenter comments on Mitigation Measure HAZ-1 of the IS-MND (Page 84), and states that the following paragraph reads as if a DEH case closure letter might be required to be submitted to the City prior to issuance of grading permits. The commenter states that this is unlikely to occur.

“The SCCDEH closure and approval documents shall be delivered to and reviewed by the project applicant. The project applicant shall furnish copies of the completed reports and approval documents to the City Planning Department prior to issuance of grading permits.”

The commenter recommends revising the paragraph to reduce confusion regarding requiring a DEH case closure letter.

In response to this comment, Mitigation Measure HAZ-1 has been revised. The revisions are listed in Chapter 4 of this document.



March 15, 2023

City of Palo Alto, 250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301

Attn: Claire Raybould
By Email: claire.raybould@cityofpaloalto.org

Dear Claire,

VTA appreciates the opportunity to comment on the Initial Study/Mitigated Negative Declaration for the 3001 El Camino Real Affordable Housing Project. VTA has reviewed the document and has the following comments:

Pedestrian Access

VTA appreciates that the proposed building orientation faces El Camino Real towards where VTA offers bus service and is near our bus stops.

The project should be amended to provide wider sidewalks along El Camino Real. The proposed five feet width is not sufficient given the level of pedestrian activity along El Camino Real, especially given the number of new units proposed for this project.

Bicycle Access

VTA applauds the addition of a substantial bicycle parking room on site. VTA recommends the access to the bike room be removed from public access and instead allow the room to be accessed through a more secure space such as the lobby. This will reduce the risk of theft.

Thank you again for the opportunity to review this project. If you have any questions, please do not hesitate to contact me at 408-321-5830 or lola.torney@vta.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lola Torney', is written over a light blue horizontal line.

Lola Torney
Transportation Planner III

PA1703

Letter 3

COMMENTER: Lola Torney, Transportation Planner III, Santa Clara Valley Transportation Authority

DATE: March 15, 2023

Response 3.1

The commenter recommends that wider sidewalks should be provided along El Camino Real, and suggests that the proposed five-foot width is not sufficient given the level of pedestrian activity along El Camino Real.

The proposed project would provide a 12-foot effective sidewalk width in areas without planter strips. In areas where existing street planting is retained to improve the pedestrian experience, 7 feet, 6 inches of clear pedestrian access and 4 feet and 6 inches of planter strip width would be provided. This complies with the City's required 12-foot effective sidewalk width requirements along El Camino Real. No changes to the IS-MND are required as a result of this comment.

Response 3.2

The commenter recommends that access to the proposed bicycle parking room should be removed from public access in order to reduce the risk of theft, and instead the project should allow the bicycle parking room to be accessed through a more secure space such as the lobby.

The location of the bicycle parking room has been changed from the corner of El Camino Real and Olive Avenue to exit out to the proposed entry courtyard. This would ensure higher security since the bicycle parking room would be removed from public access and the bicycle room access would be visible from the lobby. No changes to the IS-MND are required as a result of this comment.

3 Public Hearing Comments and Responses

Verbal comments received at the Architectural Review Board hearing on March 2, 2023, are summarized below. The comment summaries are derived from the minutes provided on this webpage: <https://www.cityofpaloalto.org/Departments/Planning-Development-Services/Architectural-Review-Board-ARB/Current-ARB-Agendas-Minutes>.

3.1 Architectural Review Board Hearing – March 2, 2023

Response PTC-1

Peter Baltay stated an opinion that Mitigation Measure BIO-1 is an unnecessary burden on the applicant and not a realistic concern; Mitigation Measure BIO-2 is already covered by the City's Tree Protection Ordinance; and Mitigation Measure GEO-1 is an overreach and unnecessary.

As discussed in Section 4, *Biological Resources*, of the IS-MND, the proposed project would remove seven trees on the property which may support nesting birds protected under the Migratory Bird Treaty Act. Therefore, Mitigation Measure BIO-1 is required to protect nesting birds. Although the proposed project would be required to comply with the City's Tree Preservation and Management Ordinance, the Arborist Report prepared by David L. Babby on September 23, 2022 found that construction activities could result in injuries to trees including mechanical injuries to trunks, roots, and branches. The Arborist Report included recommendations in order to ensure the safety and protection of trees off-site, which are included as part of Mitigation Measure BIO-2 and would reduce impacts to trees to a less than significant level.

As discussed in Section 7, *Geology and Soils*, of the IS-MND, Quaternary older alluvium late Pleistocene in age underlies the southern portion of the project site. Pleistocene alluvial sediments have produced significant paleontological resources throughout California, and therefore Quaternary older alluvium has high paleontological sensitivity. Excavation in areas mapped as Quaternary older alluvium could result in significant impacts to paleontological resources, therefore, Mitigation Measure GEO-1 would be required in order to provide for the recovery, identification, and curation of previously unrecovered fossils, which would ensure that potential impacts to paleontological resources are reduced to a less than significant level.

Response PTC-2

Sandra Lockhart stated an opinion that the high density of the building does not keep with Palo Alto values and would change the whole look of Palo Alto. She also states that the future children residing in the buildings would not have enough play area. The commenter further asserts that the project would result in an unsafe traffic situation, and expresses her concern regarding flooding.

Please refer to responses 1.1 through 1.8.

4 Revisions to the Draft IS-MND

Chapter 4 presents specific changes to the text of the Draft IS-MND that are being made in response to comments received or to make corrections. In no case do these revisions result in a greater number of impacts or impacts of a substantially greater severity than those set forth in the Draft IS-MND. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with underlined and deleted text is indicated with ~~strikeout~~. Page numbers correspond to the page numbers of the Draft IS-MND.

The following revision has been made to Mitigation Measure HAZ-1 on Page 84 in Section 9, *Hazards and Hazardous Materials*, of the Draft IS-MND:

HAZ-1 SCCDEH Regulatory Agency Submittal. The project applicant shall continue to utilize Santa Clara County Department of Environmental Health (SCCDEH) Case #2018-14s for agency oversight of assessment and remediation of the project site through completion of building demolition, subsurface demolition, and construction. Prior to commencement of demolition and construction/grading activities at the project site, the project applicant shall submit the following documents to the SCCDEH project manager of the open Cleanup Program Site case:

- Current development plan and any modifications to the development plan
- All environmental documents completed for the project
- Following demolition and construction grading activities, all future environmental documents completed for the project

Subsurface soil, soil vapor, groundwater investigations, and/or other remediation reports, if required by SCCDEH after submittal of above required documents, shall be conducted in accordance with a sampling plan that shall be reviewed and approved by SCCDEH. SCCDEH may require approval of the final Site Management Plan (SMP) required by Mitigation Measure HAZ-2, below, prior to issuance of any required building or grading permits. The project applicant shall comply with SCCDEH requirements, conduct further investigations as required, and submit the results to SCCDEH.

SCCDEH may determine that San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) or Department of Toxic Substances Control (DTSC) may be best suited to perform the cleanup oversight agency duties for the assessment and/or remediation of the Project. Should the cleanup oversight agency be transferred from SCCDEH to SFBRWQCB or DTSC, this and other mitigation measures will still apply.

If groundwater wells or soil vapor monitoring probes are identified during demolition, subsurface demolition, or construction at the project site, they will be abandoned or relocated per Santa Clara Valley Water District (SCVWD) specifications.

Abandonment activities will be documented in a letter report submitted to SCVWD within 60 days of the completion of abandonment activities.

3001 El Camino Real Affordable Housing Project

The ~~SCCDEH closure and~~ oversight agency's (SCCDEH, SFBRWQCB, or DTSC) approval documents shall be delivered to and reviewed by the project applicant. The project applicant shall furnish copies of the completed reports and approval documents, including the final SMP or equivalent document required by Mitigation Measure HAZ-2, to the City Planning Department prior to issuance of grading permits.

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