CITY OF CAMPBELL
Community Development Department

ADDENDUM TO A MITIGATED NEGATIVE DECLARATION (MND) AND INFILL ENVIRONMENTAL CHECKLIST

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The Dillon Avenue Townhomes and Apartments Project (Revised)
280 Dillon Avenue et al.

Pursuant to Section 15164 of the CEQA Guidelines, the City of Campbell has prepared an Addendum to an Infill Environmental Checklist/Mitigated Negative Declaration because minor changes made to the project that are described below do not raise important new issues about the significant impacts on the environment.

PROJECT NAME, APPLICATION FILE NUMBERS, AND LOCATION

Project Name: The Dillon Avenue Townhomes and Apartments Project

File Nos.: Modification (PLN2015-170) to a previously approved and modified Planned Development Permit (PLN2013-337 / PLN2015-48); Modification (PLN2015-171) to a previously approved and modified Tentative Vesting Subdivision Map (PLN2013-339 / PLN2015-49); Parking Modification Permit (PLN2015-172); and Tree Removal Permit (PLN2015-173)

Location: The approximate five acre, multi-parcel project site is generally located at the southeast corner of Dillon Avenue and Sam Cava Lane at 180, 186, 190, 230, 240, 260, 272, 280, 282, and 290 (portion) Dillon Avenue; 466, 472, 482, and 488 Sam Cava Lane; and 186 Gilman Avenue

PROJECT DESCRIPTION

On October 21, 2014, the City of Campbell adopted a Mitigated Negative Declaration by City Council Resolution No. 11735 for which an Infill Environmental Checklist was prepared for the Dillon Avenue Townhomes and Apartments Project (referred to herein as "approved project") in accordance with the California Environmental Quality Act (CEQA). The approved project analyzed in the Infill Environmental Checklist/Mitigated Negative Declaration consisted of 81 townhome units (fee title ownership), 19 apartment (rental) units, and associate site work, including grading, landscaping, and private roadway improvements. The approved project included approval of a Planned Development Permit (PLN2013-337), a Vesting Tentative Subdivision Map (PLN2013-339), and a Tree Removal Permit (PLN2014-191).

Following the City's approval, the applicant acquired additional property for purposes of expanding the scope of the project. As not to incur delay, the applicant submitted applications to separate the approved project into two phases, allowing construction of one portion to begin while the expansion proposal is reviewed. The phasing plan was approved by the City Council in July 21, 2015, with a determination that since the phasing plan did not change the nature or scope of the approved project as understood in the previously adopted environmental documents, no additional environmental review was required.

The applicant's proposal to expand the project (herein "revised project") would incorporate three additional properties, allowing the addition of nine townhomes and nine apartment units, increasing the total unit count from 100 to 118 units (90 townhomes and 28 apartment units). Additionally, the revised project would modify the site configuration, reduce the amount of required on-site guest parking, and allow removal an additional protected tree. The proposal will require a Modification (PLN2015-170) to a previously approved and modified Planned Development Permit (PLN2013-337 / PLN2015-48), a Modification (PLN2015-171) to a previously approved and modified Tentative Vesting Subdivision Map (PLN2013-339 / PLN2015-49), a Parking Modification Permit (PLN2015-172), and a Tree Removal Permit (PLN2015-173).

The adopted Infill Environmental Checklist/Mitigated Negative Declaration evaluated the environmental impacts that might reasonably be anticipated to result from the implementation of the project. This Addendum was prepared to evaluate the environmental impacts that may result from revised project as described above and confirm whether any new significant impacts or a substantial increase in the severity of previously identified impacts would result from the revised project. Specifically, the following impacts were reviewed and found to be adequately considered by the Infill Environmental Checklist/Mitigated Negative Declaration:

☒ Aesthetics	☒ Agricultural Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Geology/Soils
☒ Greenhouse Gas Emissions	☒ Hazards/Hazardous Materials	☒ Hydrology/Water Quality
☒ Land Use/Planning	☒ Mineral/Energy Resources	☒ Noise
☒ Population/Housing	☒ Public Services	☒ Recreation
☒ Transportation/ Circulation	☒ Utilities/Service Systems	

ANALYSIS

The California Environmental Quality Act (CEQA) recognizes that between the date an environmental document is completed and the date the project is fully implemented, one or more of the following changes may occur: 1) the project may change; 2) the environmental setting in which the project is located may change; 3) laws, regulations, or policies may change in ways that impact the environment; and/or 4) previously unknown information can arise. Before proceeding with a project, CEQA requires the Lead Agency to evaluate these changes to determine whether or not they affect the conclusions in the environmental document.

The purpose of this Addendum is to evaluate the environmental impacts of the revised project, which would allow for the development of 118 residential units, including 90 townhomes and 28 apartment units, and associated site work, including grading, landscaping, and private roadway improvements.

The CEQA Guidelines §15162 state that when a negative declaration has been adopted for a project, no subsequent EIR or negative declaration shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

    b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines §15164(b) state that an addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in §15162 calling for the preparation of a subsequent Environmental Impact Report or negative declaration have occurred.

Based on the proposed revised project description, the environmental review prepared for the Infill Environmental Checklist/Mitigated Negative Declaration, and the attached supplemental analysis, the City has concluded that the proposed revised project would not result in any new significant impacts not previously disclosed in the adopted Infill Environmental Checklist/Mitigated Negative Declaration nor would it result in a substantial increase in the magnitude of any significant environmental impact previously identified in the Infill Environmental Checklist/Mitigated Negative Declaration.

For these reasons, an addendum to the adopted Infill Environmental Checklist/Mitigated Negative Declaration for the revised Dillon Avenue Townhomes and Apartments Project has been prepared and a supplemental or subsequent Environmental Impact Report or Infill Environmental Checklist/Mitigated Negative Declaration is not required for the proposed revised project. This addendum will not be circulated for public review, but will be attached to the final Infill Environmental Checklist/Mitigated Negative Declaration for the Dillon Avenue Townhomes and Apartments Project, pursuant to CEQA Guidelines §15164(c) and postponed on the City's website. All documents referenced in this Addendum are available for public review in the Campbell Community Development Department at Campbell City Hall, 70 N. First Street, during normal business hours and online on the City's 'Environmental Notices' webpage (http://www.cityofcampbell.com/Archive.aspx?AMID=49).

October 9, 2015

Daniel Fama, Associate Planner
Community Development Department

Date

CITY OF CAMPBELL
Community Development Department

SUPPLEMENTAL ANALYSIS

ADDENDUM TO A MITIGATED NEGATIVE DECLARATION (MND) AND INFILL ENVIRONMENTAL CHECKLIST

Project Title: Dillon Avenue Townhomes and Apartments (Revised)

File Number(s): Modification (PLN2015-170) to a previously approved and modified Planned Development Permit (PLN2013-337 / PLN2015-48); Modification (PLN2015-171) to a previously approved and modified Tentative Vesting Subdivision Map (PLN2013-339 / PLN2015-49); Parking Modification Permit (PLN2015-172); and Tree Removal Permit (PLN2015-173)

Project Address: 180, 186, 190, 230, 240, 260, 272, 280, 282, and 290 (portion) Dillon Avenue; 466, 472, 482, and 488 Sam Cava Lane; and 186 Gilman Avenue

Project Sponsor: Santa Clara Development / Robson Homes
2185 The Alameda
Santa Jose, CA 95126

Zoning District: P-D (Planned Development)

General Plan *Commercial/Med.-High Density Residential (14-27 units/gr. acre)* and *High Density Residential (21-27 units/gr. acre)*

Lead Agency: City of Campbell, Community Development Department
70 N. First Street, Campbell, CA 95008

Contact Person: Daniel Fama, Associate Planner
(408) 866-2193 | danielf@cityofcampbell.com

Date Prepared: October 9, 2015

Project Setting and Surrounding Land Use: The approximately 5-acre project site is an assemblage of numerous parcels, including a portion of the City's corporation yard, generally located at the southeast intersection of Sam Cava Lane and Dillon Avenue. The site consists of industrial and residential properties, and vacant land. The majority of the project site perimeter (80%) is adjacent to existing commercial, industrial, and/or residential uses. The easterly perimeter is adjacent to the Los Gatos Creek Trail. Most of the project site is within the South of Campbell Avenue (SOCA) Area.

Revised Project Description: The revised project would incorporate three additional properties (less than ½ acre), allowing the addition of nine townhomes and nine apartment units, increasing the total unit count from 100 to 118. Additionally, the revised project would modify the project's site configuration, reduce the amount of required on-site guest parking, and allow removal of one Coast Oak tree. The approved and revised project site plans are provided as exhibits on Pages 8 and 9, respectively.

Revised Project Data:

Net Lot Area:	4.92 acres (including 0.22 of City property)
Gross Lot Area:	5.23 acres
Zoning:	P-D (Planned Development)
General Plan:	*Commercial/Med.-High Density Residential (14-27 units/gr. acre)* and *High Density Residential (21-27 units/gr. acre)*
Proposed Units:	118 units (90 townhomes and 28 apartments)
Allowable (Max) Units:	141 units
Proposed Density:	22.6 units/gr. acre (118 units / 5.23 gross acres)
Allowable (Max) Density:	27 units/gr. acre
Unit Sizes	
Townhomes:	1,470 sq. ft. to 2,159 sq. ft.
Apartments:	460 sq. ft. to 1,237 sq. ft.
Building Coverage:	43.8% (93,703 sq. ft. of building "footprint")
Floor Area Ratio (FAR):	1.24 (266,071 sq. ft. of total building area)
Building Height	
Townhome Rows:	38 feet
Apartment Building	40 feet
Maximum Height Allowed:	75 Feet (Maximum Allowable within City)

Parking Required:	Provided	Minimum Required
Garage Spaces:	230 spaces	229 spaces (1 ½ - 2 spaces per unit)
Surface (guest) Spaces:	50 spaces	59 spaces (½ space per unit)

Revised Project Site Configuration: The additional properties will allow the revised project to have a more cohesive layout than the approved; although the project site will remain irregularly shaped with non-contiguous street frontage. However, with the additional linear frontage upon Dillon Avenue, the revised project would be less inward-oriented than the approved. The outward-facing presence along the adjacent public streets is defined by a row of six townhomes and two apartment buildings along Sam Cava Lane, and Dillon Avenue, respectively. These buildings will be situated with a minimal setback close to the sidewalk to provide an urban presence.

The private roadway system would maintain a "branching" configuration—where a primary road intersects with a series of short connecting roads—to provide vehicular access within the development. Garages will occur at the back of the buildings so that front building elevations will either face internal walkways or orient towards the public street. The roadway will interface with the public street at the terminus of Dillon Avenue to the south (adjacent to the City's corporation yard) where a partial cul-de-sac will be constructed, and at Sam Cava Lane to the north.

The revised project's site configuration differs from the approved project in several ways:

- Eighteen townhome buildings (90 units) are shown ranging in size from three units to seven units. Previously, the project consisted of 13 townhome buildings (81 units) with rows as large as ten units. The smaller rows break-up the linear expanse minimizing the building massing within the interior of the project.
- Instead of one large apartment building (12 units) and two smaller apartment buildings (3 and 4 units), the project now includes two large apartment buildings (12 and 16 units).
- The roadway shifts away from the corporation yard, moving the Dillon Avenue driveway north away from the cul-de-sac bulb.
- Additional townhomes are placed along the southerly property line, abutting the corporation yard.

Revised Project Parking: Since the project site is located within a ¼ mile of the Downtown Light Rail Station, it is considered a transit-oriented development (TOD), subject to the parking standard that requires 1 ½ spaces per unit for a studio/1-bedroom unit and 2 spaces for each unit with 2 or more bedrooms, as well as ½ space per unit as guest parking. Pursuant to this standard, the project is required to provide 229 covered (garage) parking stalls as well as 59 guest (surface) parking stalls, for an aggregate total of 288 parking stalls. The revised project would provide all of the required covered parking stalls for each of the individual residential townhome and apartment units, but only 50 guest stalls resulting in a deficit of 9 stalls whereas the approved project was fully parked. Due to this deficiency, the application for the revised project includes a request for a Parking Modification Permit to allow a reduction to the required number of parking stalls. The decision-making body may approve a reduction if it finds that the anticipated number of parking spaces necessary to serve the development is less than that required, and would be satisfied by the proposed number of parking spaces.

Revised Project Architectural Design: The revised project continues to present two distinct architectural concepts. The townhomes, which make up much of the interior of the site, as well as the units along Sam Cava Lane, are depicted in a traditional design. In comparison, the apartment buildings are depicted in a contemporary design evocative of the neighborhood's current industrial makeup. The approved project provided the Community Development Director discretion to allow architectural refinements to the project. Over the last year, staff and the developer have worked on the revisions to the townhome design intended to provide a more distinctive appearance. The changes maintain a similar building form as approved by the City Council, but improve on the articulation, detailing, and material composition.

Revised Project Tree Removal: One of the additional parcels proposed to be incorporated into the revised project has a Coast Live Oak tree. Due to the location of this tree, it cannot be reasonably retained. However, the revised project includes planting of new trees in excess of what are being removed.

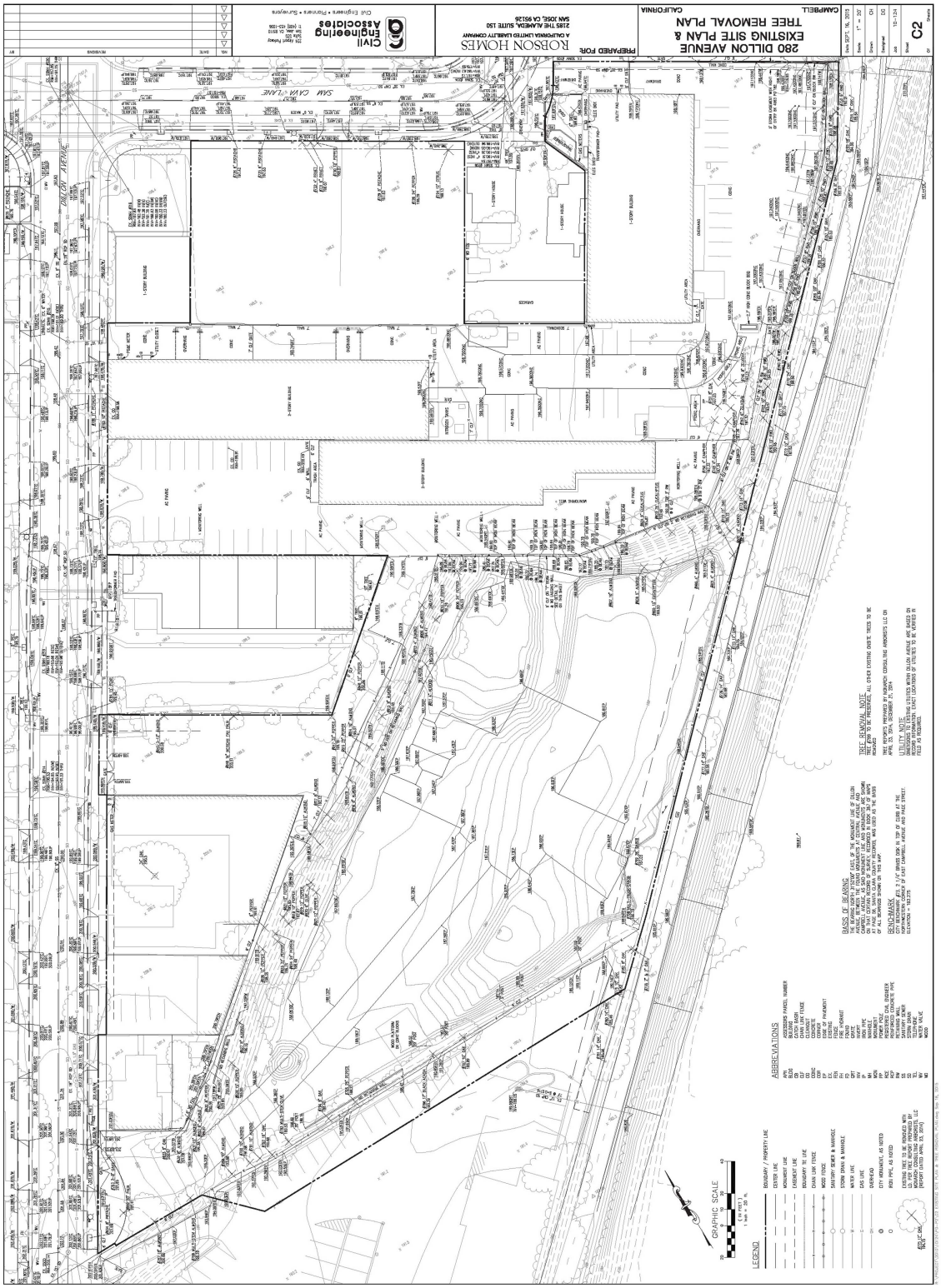
Location Map

Site Photographs

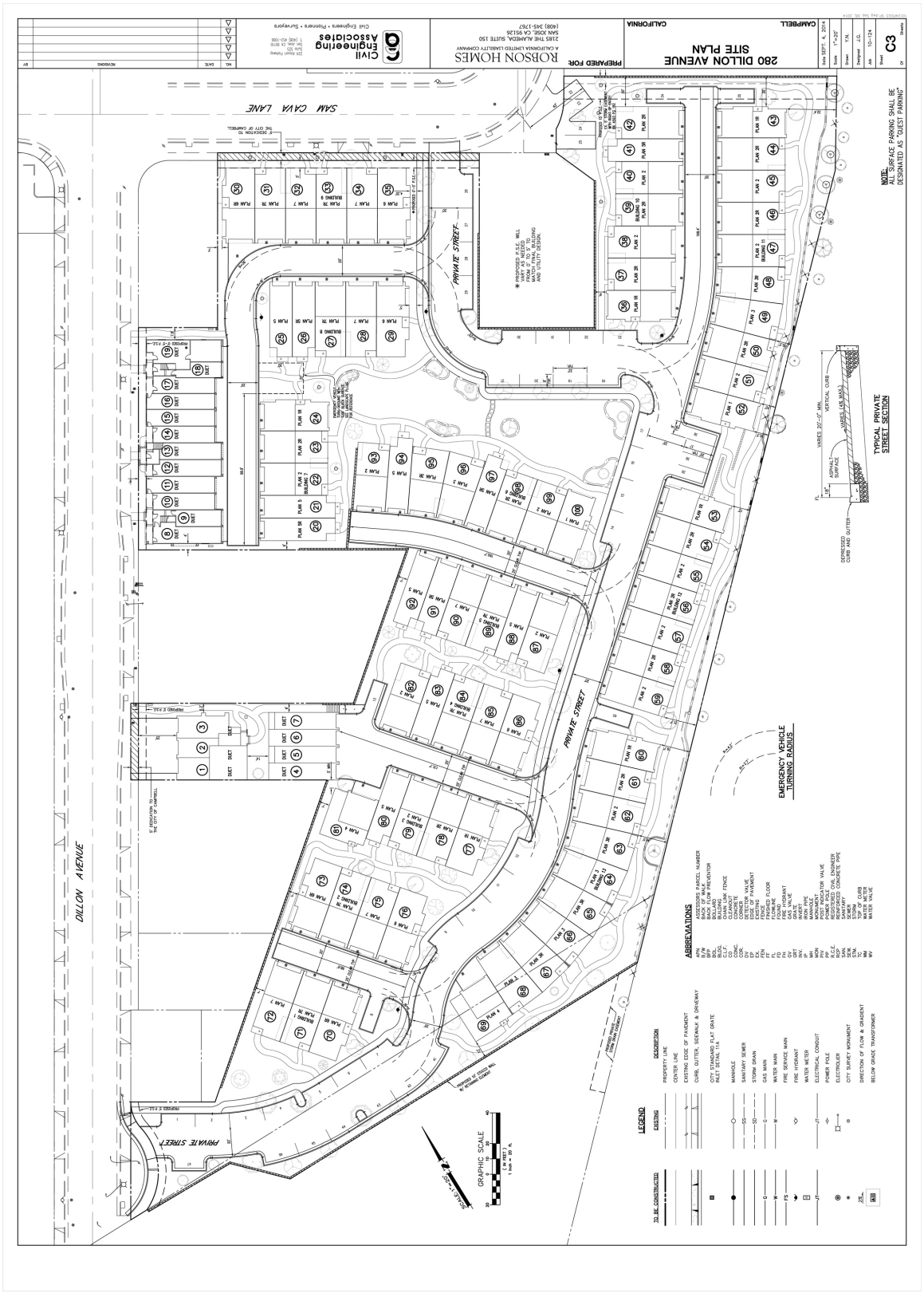
VIEW OF THE SITE LOOKING NORTHERLY

VIEW OF THE SITE LOOKING EASTERLY

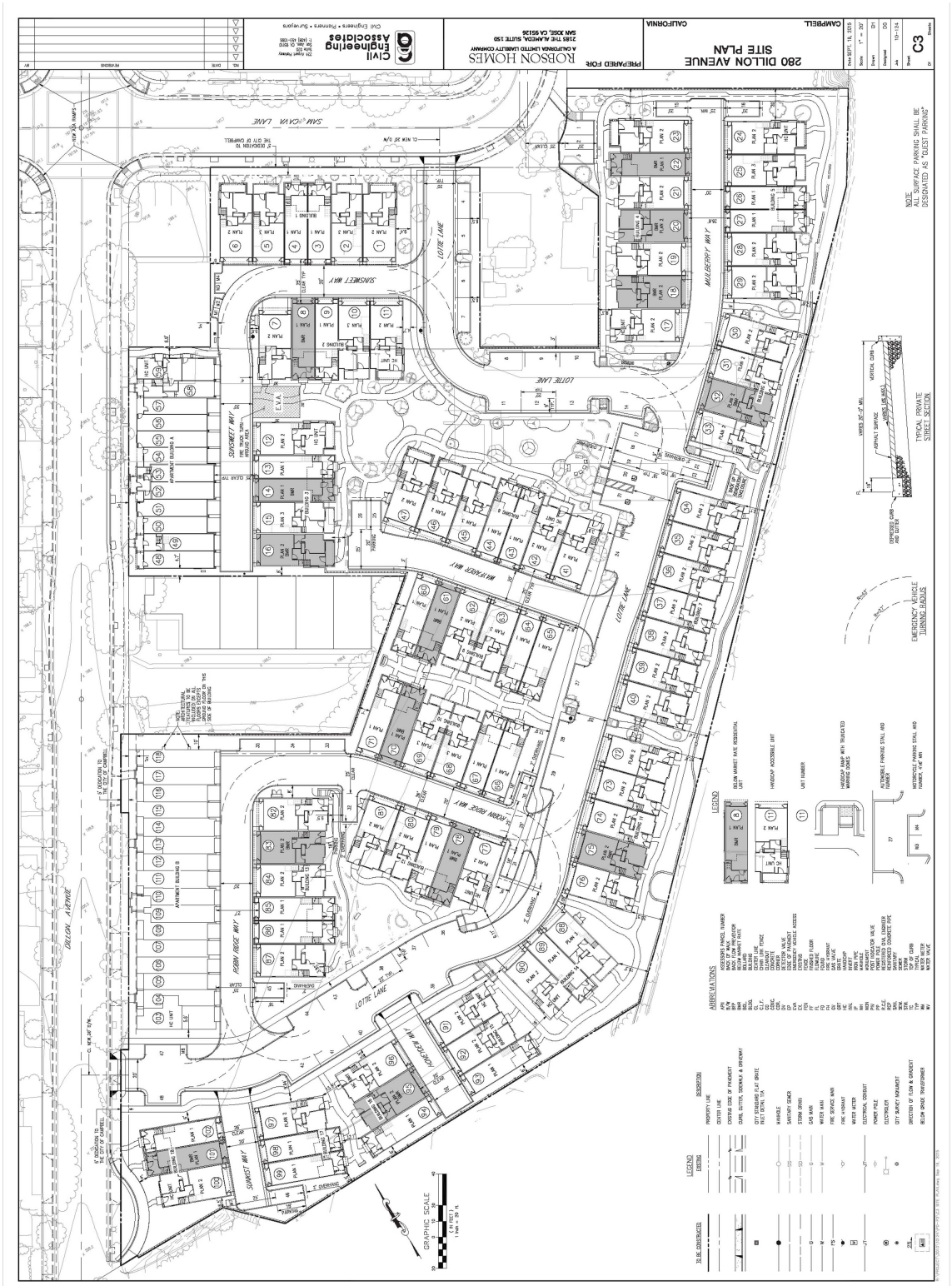
Existing Site Configuration



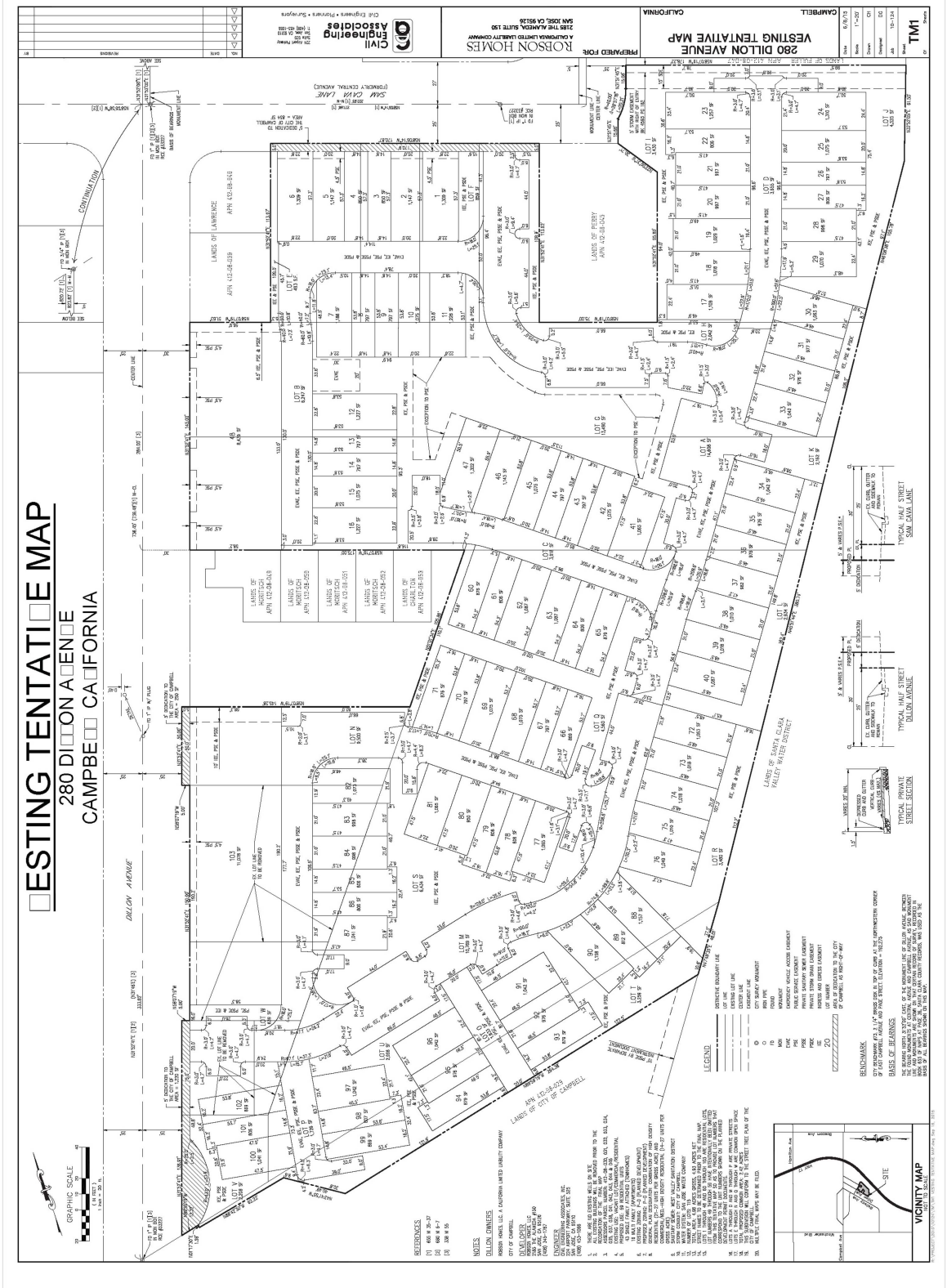
Approved Site Plan



Revised Site Plan



Revised Tentative Vesting Subdivision Map



Revised Preliminary Grading and Drainage Plan

1. AESTHETICS

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
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 the site and its surroundings?	☐	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒	☐

(a-c) – No Impact (Same as Approved Project): As with the approved project, the revised project will alter the existing visual character of the site and its surroundings through demolition of existing structures and eventual development planned residential community. Although the Los Gatos Creek is not identified as a scenic vista, scenic resource, or view-corridor, its importance to the community and it's adjacency to the creek was given special consideration. The project design is intended to compliment and respect to the creek corridor through appropriate building orientation, transparent fencing, and suitable landscape vegetation. As a result, the revised project would not result in a substantial adverse effect on a scenic vista, or substantially damage scenic resources.

Additional and/or Revised Mitigation Measures Required: None required

(d) – Substantially Mitigated by Uniformly Applicable Development Policies (Same as Approved Project): The majority of the project site has very limited lighting. As with the approved project, the revised project's new site lighting is anticipated to include down-lit fixtures for new residences and freestanding lighting fixtures along the new public pathway and internal roadways. However, light and glare associated with new site lighting would be substantially mitigated by the Lighting Design Standards (CMC Sec. 21.18.090), which requires lighting to be designed and installed so that light rays are not emitted across property lines. This standard will be implemented through requirement of a photometric plan during building permit plan check.

Additional and/or Revised Mitigation Measures Required: None required

2. AGRICULTURAL RESOURCES

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
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 Programs 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 or timblerland zoned Timberland Production?	☐	☐	☐	☒	☐
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?	☐	☐	☐	☒	☐

(a-e) – No Impact (Same as Approved Project): The project site is not currently used for, nor zoned for, farmland or other agricultural or horticultural purpose. Neither the project site nor surrounding properties contain farmland or support agricultural activity that could be impacted by the revised project.

Additional and/or Revised Mitigation Measures Required: None required

3. AIR QUALITY

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒	☐
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒	☐

The Infill Environmental Checklist included a complete air quality analysis discussion on the approved project based on *'Air Quality and Greenhouse Gas Technical Memorandum', prepared by Environmental Science Associates (ESA).* The analysis was based on the previously-adopted 2011 thresholds of the BAAQMD to determine the potential impacts of the project. While the significance thresholds adopted by BAAQMD in 2011 are not currently recommended by the BAAQMD (based on court decision), these thresholds are based on substantial evidence identified in BAAQMD's 2009 Justification Report and are therefore used.

(a) – Less than Significant with Mitigation (Same as Approved Project): The 2010 Clean Air Plan (CAP) control strategy includes stationary source control measures to be implemented through BAAQMD regulations; mobile source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with the Metropolitan Transportation Commission (MTC), local governments, transit agencies, and others. BAAQMD guidance states that "if approval of a project would not result in significant and unavoidable air quality impacts, after the application of all feasible mitigation, the project would be considered consistent with the 2010 CAP." As discussed in the Infill Environmental

Checklist, the approved project would not result in significant and unavoidable air quality impacts. Construction-related toxic air containments (TAC) and fugitive dust emissions would be less than significant with implementation of previously adopted mitigation measures. Long-term operational emissions would be less than significant without mitigation. Since the addition of 18 units is a minor expansion of the project scope, the revised project would not conflict with or obstruct implementation of the applicable air quality plan, with incorporation of the previously adopted mitigation measures.

Additional and/or Revised Mitigation Measures Required: None required. Previous measures are applicable and sufficient.

(b) – Less than Significant with Mitigation (Same as Approved Project): The revised project would result in the generation of criteria pollutants and TACs during short-term construction activities comparable to the approved project. In regards to long-term operations, the revised project would result in criteria pollutant emissions from sources including on-road vehicles, onsite area and energy sources (e.g., natural gas combustion for space and water heating, landscape maintenance, use of consumer products such as hairsprays, deodorants, cleaning products, etc.) also comparable to the approved project. However, since the revise project consists of development of only residential land uses, it would not be a source of substantial TACs. The approved project was determined to be far below the thresholds of significance for criteria air pollutants, toxic air contaminants and PM2.5, and – criteria air pollutants. Since the addition of 18 units is a minor expansion of the project scope, the revised project would not result in impacts that would require additional mitigation measures beyond those already adopted.

Additional and/or Revised Mitigation Measures Required: None required. Previous measures are applicable and sufficient.

(c) – No Impact (Same as Approved Project): The revised project would result in the generation of criteria pollutants during short-term construction activities. In regards to long-term operations, the project would result in criteria pollutant emissions primarily from motor vehicles and area sources. According to the BAAQMD, no single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards for regional criteria pollutants. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. According to the BAAQMD Justification Report, if a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions (BAAQMD, 2009). As described above, criteria pollutant emissions generated by short-term construction and long-term operations of the revised project would not exceed the BAAQMD significance thresholds. Thus, the revised project would have a less than significant cumulative impact in relation to regional emissions. In addition, project-related traffic would not exceed CO standards and would result in a less than significant cumulative impact in relation to localized CO.

Additional and/or Revised Mitigation Measures Required: None required.

(d) – Less than Significant with Mitigation (Same as Approved Project):

Construction and Operations. As indicated in the discussion of above, the revised project would not result in significant and unavoidable localized air quality impacts associated with TACs, CO, or fugitive dust. Construction TAC and fugitive dust emissions would be less than significant with

implementation of previously adopted mitigation measures. The project consists of development of residences and would not be a source of substantial TACs that would affect sensitive receptors in the area. Long-term operational emissions of TACs and CO would be less than significant without mitigation.

Land Use Compatibility for Proposed Sensitive Receptors. As discussed in the Infill Environmental Checklist the BAAQMD method for determining health risk requires the review of health risk from permitted sources, railroads, and major streets in the vicinity of a project site (i.e., within 1,000 feet of the proposed new sensitive residential receptors on the project site), then adding the project operational impacts to determine whether the cumulative health risk thresholds are exceeded. Highway 17 is approximately 300 feet from the project site. The cumulative cancer risk from all sources within 1,000 feet of proposed sensitive receptors would be approximately 53 in one million, which would be below the BAAQMD cumulative threshold of 100 in one million and would be less than significant. The cumulative hazard index from all such sources would be approximately 0.06, which is well below the significance threshold of 10 and would be less than significant. The cumulative PM2.5 concentration would be approximately 0.3 µg/m3, which would be below the significance threshold of 0.8 µg/m3 and hence is considered less than significant. Since the addition of 18 units is a minor expansion of the project scope, the revised project would not result in impacts that would require additional mitigation measured beyond those already adopted.

Additional and/or Revised Mitigation Measures Required: None required. Previous measures are applicable and sufficient.

(d) – No Impact (Same as Approved Project): BAAQMD has identified typical sources of odor in the CEQA Air Quality Guidelines, a few examples of which include manufacturing plants, rendering plants, coffee roasters, wastewater treatment plants, sanitary landfills, and solid waste transfer stations. While sources that generate objectionable odors must comply with air quality regulations, the public's sensitivity to locally produced odors often exceeds regulatory thresholds. The revised project would not include uses that have been identified by BAAQMD as potential sources of objectionable odors; this is a less than significant impact.

4. BIOLOGICAL RESOURCES

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
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 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, or regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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	☐	☐	☐	☒	☐

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?					

The Infill Environmental Checklist included a biological resource analysis discussion based based on *'Biological Evaluation of the Dillon Property Project Site", prepared by Live Oak Associates, Inc.*

(a,d) – Less than Significant with Mitigation (Same as Approved Project): According to the California Natural Diversity Database and the City's General Plan, no species identified as a candidate, sensitive or special status species, or habitat for such species are known to occupy the project site. However, due to the site's adjacency to the Los Gatos Creek, a biological evaluation was prepared for the approved project. The evaluation determined that most special status animal species would not occur on the site, or be unlikely to occur on the site, because habitats on the site are not suitable for them, the site is located outside of the species' known range, and/or there are no known occurrences in the vicinity of the site. However, a few special status species have been documented in the immediate project vicinity. As discussed in the previous Infill Environmental Checklist, potential impacts to Cooper's Hawk, Townsend's Big-eared Bat, Pallid Bat and other bat species, and tree-nesting raptors and other nesting migratory birds, could occur as a result of the project. Such impacts would remain less than significant with adopted mitigation measures.

Additional and/or Revised Mitigation Measures Required: None required. Previous measures are applicable and sufficient.

(b-c) – Substantially Mitigated by Uniformly Applicable Development Policies (Same as Approved Project): The Los Gatos Creek riparian corridor occurs adjacent to the site, separated from the site by a cyclone fence and by the Los Gatos Creek trail, a paved recreational trail that is approximately 14 feet wide along the top of the creek bank. Native chinook salmon and steelhead, as well as other native fish species are known to occur in the creek. The creek also likely supports several species of common amphibians, such as Pacific tree frogs and western toads; and reptiles such as the western pond turtle, a California Species of Concern. Numerous small mammals also likely occur in the creek corridor from time to time including Virginia opossum, raccoon, and striped skunk.

The revised project will require grading, excavation, and vegetation removal, comparable to the approved project, thereby resulting in the project site becoming vulnerable to sheet, rill or gully erosion. Eroded soil is generally carried as sediment in surface runoff to be deposited in natural creek/river beds, canals, and adjacent wetlands. To avoid or minimize sedimentation to offsite waters, the applicant is required to comply with comply with standard erosion control measures, including preparation of an erosion control plan that employ best management practices (BMPs), develop a Storm Water Pollution Prevention Plan (SWPPP) per State Water Quality Control Board Stormwater Permit, conform with City's stormwater and grading requirements (CMC Sec. 20.80.020 and 21.16.100), and obtain all necessary permits. As a result, potential impacts to downstream waters

from erosion and polluted stormwater runoff, that could also affect riparian habitats, will continue to be substantially mitigated.

Additional and/or Revised Mitigation Measures Required: None required

(e) – Substantially Mitigated by Uniformly Applicable Development Policies (Same as Approved Project): The approved project includes removal of almost all on-site trees. The adopted Mitigated Negative Declaration found that the tree loss would be substantially mitigated by uniformly applicable development policies, and would not conflict with the City's Tree Protection Ordinance. The revised project will require removal of a protected Coast Live Oak tree. According to the arborist report (reference **Attachment 1**) the tree is improperly suited for preservation because the individual specimen is unsuited for the intended future use of the site. The City's Tree Protection Ordinance (CMC 21.32) requires a permit to remove any tree 12-inches in diameter or greater (with the exception of fruit and Eucalyptus trees). As required by CMC 21.32, this "protected trees" will be replaced at a one-to-one ratio. As such, the potential tree loss would continue to be substantially mitigated by uniformly applicable development policies with the revised project, and would not conflict with the City's Tree Protection Ordinance.

Additional and/or Revised Mitigation Measures Required: None required

(f) – No Impact (Same as Approved Project): No adopted Habitat Conservation Plan, Natural Community Conservation Plan or approved local, regional or state habitat conservation plans apply to the revised project or the project site.

Additional and/or Revised Mitigation Measures Required: None required

5. CULTURAL RESOURCES

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	☐	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	☐	☐	☐	☒	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒	☐

(a) – No Impact (Same as Approved Project): The expanded project site for the revised project does not contain known historical resources as defined in §15064.5 of the CEQA Guidelines nor is any property within the project site identified as historically significant or potentially historical significantly by the Campbell Historic Resource Inventory (HRI).

Additional and/or Revised Mitigation Measures Required: None required

(b-c) – Analyzed in Prior EIR (Same as Approved Project): The Campbell General Plan EIR recognized that construction activity could result in the exposure of undocumented paleontological and archaeological resources (Impact CULT-1, Pg. 150). This potential impact was mitigated to a less than a significant level through incorporation of the General Plan Strategy CNR-1.1b. The requirement to properly handle any discovered archeological or paleontological resources was incorporated in the approved project's conditions of approval, which will be carried over to the revised project.

Additional and/or Revised Mitigation Measures Required: None required

(d) – Substantially Mitigated by Uniformly Applicable Development Policies (Same as Approved Project): No human remains are known to exist on the project site. However, should human remains be discovered during excavation or construction for the revised project, such remains shall be handled pursuant to § 7050.5 of the California Health and Safety Code and § 5097.94 of the California Public Resources Code.

Additional and/or Revised Mitigation Measures Required: None required

6. GEOLOGY AND SOILS

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
a) Expose people or structures to 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.	☐	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	☒	☐
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?	☐	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial 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?	☐	☐	☐	☒	☐

(a,c-d) – Substantially Mitigated by Uniformly Applicable Development Policies (Same as Approved Project): The project site is located within the seismically active San Francisco Bay Area. According to maps prepared under the Alquist-Priolo Earthquake Fault Zone Act, there are no zoned active faults within the City of Campbell. Therefore, ground rupture is not likely to occur at the site. According to the State Seismic Hazard Zones Map, the project site is not located in any hazard zone and therefore does not have the potential for liquefaction or earthquake-induced landslides. However, the nearest major earthquake faults are the Monte Vista Shannon Fault, San Andreas Fault, the Hayward-Rogers Creek Fault and the Calaveras Fault, all of which pose the greatest earthquake threat because of their high quake potential. The project will likely be subjected to at least one moderate to severe earthquake that will cause moderate to severe ground shaking during the useful life of the proposed residential buildings. Ground shaking on the site could damage buildings, roads and utilities.

As required by the CMC Sec. 21.18.130 the revised project shall conform to the California Building Code provisions regarding engineering and geotechnical analysis. This project will require preparation of a geotechnical report, the conclusions and recommendations of which shall become the standards for review of the construction drawings for a building permit. A draft geotechnical report was prepared for the approved project, and supplemental geotechnical letters regarding the revised project have also been prepared (reference **Attachment 2**). Conformance with the recommendations of the geotechnical report and supplemental letters will substantially mitigate the potential for seismic damage and geologic instability and risk to future occupants.

Additional and/or Revised Mitigation Measures Required: None required

(b) – No Impact (Same as Approved Project): The potential for unstable soil conditions and erosion would not be significant because the revised project will be required to comply with the recommendations of the geotechnical analysis, as noted above. Air quality mitigation measures to control construction dust, as incorporated in the adopted Mitigated Negative Declaration, will also mitigate for wind-blown erosion.

Additional and/or Revised Mitigation Measures Required: None required

(e) – No Impact (Same as Approved Project): The revised project would not involve the use of septic tanks or alternative waste water disposal systems.

Additional and/or Revised Mitigation Measures Required: None required

7. GREENHOUSE GAS EMISSIONS

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
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 adopted plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒	☐

The Infill Environmental Checklist included a complete discussion on the approved project's greenhouse gas (GHG) emissions, based on *'Air Quality and Greenhouse Gas Technical Memorandum', prepared by Environmental Science Associates (ESA).*

(a) – No Impact (Same as Approved Project): Application of BAAQMD's project-specific GHG emissions thresholds is to include both direct emissions from a project's vehicle trip generation and onsite water and space heating and other stationary sources, as well as indirect emissions from offsite electrical generation, solid waste generation, and water conveyance and treatment. The approved project was reviewed using the CalEEMod model to estimate GHG emissions from motor vehicle trips, grid electricity usage, solid waste, and other sources (including area sources, natural gas combustion, and water/wastewater conveyance). GHG emissions associated with the approved project would be below BAAQMD's GHG threshold of 1,100 metric tons of CO2e per year. The revised project, which is 18%, larger than the approved project, would also remain under the BAAQMD's GHG threshold. As a result, the revised project would represent a cumulatively less-than-significant GHG impact.

Additional and/or Revised Mitigation Measures Required: None required

(b) – No Impact (Same as Approved Project): The City of Campbell has not established a GHG reduction plan. However, since the revised project would result in less than significant GHG emissions, as described above, the project would not conflict with any applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. This would be a less than significant impact.

Additional and/or Revised Mitigation Measures Required: None required

8. HAZARDS AND HAZARDOUS MATERIALS

		New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:						
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 it create a significant hazard to the public or the environment?	☐	☐	☐	☒	☐
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 for people residing or working in the project area?	☐	☐	☐	☒	☐
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒	☐
g)	Impair implementation of or physically interfere with an adopted emergency response	☐	☐	☐	☒	☐

		New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
	plan or emergency evacuation plan?					
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒	☐

(a) – No Impact (Same as Approved Project): No routine transport, use or disposal of hazardous materials would be associated with the revised project. A slight hazardous potential would exist during project construction when materials and construction equipment are at the site, however, long-term hazard risk is very low. Hazard risks during construction and demolition would be regulated by the City's standard conditions of approval and would be required to be performed in accordance with state and federal hazardous materials regulations and current Best Management Practices (BMPs) for construction activities as discussed in Air Quality Section of the Infill Environmental Checklist.

Additional and/or Revised Mitigation Measures Required: None required

(b-d) – Substantially Mitigated by Uniformly Applicable Development Policies (Same as Approved Project): Remediation of soil contamination, as discussed in the Infill Environmental Checklist, was conducted pursuant to the County of Santa Clara Voluntary Cleanup Program overseen by the Departmental of Environmental Health. Remediation efforts have now been completed, as noted in the California Geotracker website.

The additional properties to be included as part of the revised project are not listed on the Hazardous Waste and Substances Sites List (available at http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm). Additionally, Phase I site assessments (reference **Attachment 3**) prepared for the additional properties to did not identify any "'recognized environmental conditions"—meeting the standard set forth by American Society for Testing and Materials (ASTM)—that could be considered "significant effect" under CEQA (Guideline § 21068)

Additional and/or Revised Mitigation Measures Required: None required

(c) – No Impact (Same as Approved Project): The project site is not within ¼ mile of an existing or proposed school.

Additional and/or Revised Mitigation Measures Required: None required

(e-f) – No Impact (Same as Approved Project): The project site is not located within the Santa Clara County Airport Land Use Commission jurisdiction, within two miles of a public airport or within the vicinity of a private airstrip.

Additional and/or Revised Mitigation Measures Required: None required

(g) – No Impact (Same as Approved Project): The revised project would not interfere with emergency response or evacuation plans. Sufficient emergency access and emergency services staff would be provided for the project site in compliance with the State of California Building Code Standards and requirements of the Santa Clara County Fire and Health Departments.

Additional and/or Revised Mitigation Measures Required: None required

(h) – No Impact (Same as Approved Project): The project site is not located near any wildland areas and would not cause an increase in wildland fire hazard.

Additional and/or Revised Mitigation Measures Required: None required

9. HYDROLOGY AND WATER QUALITY

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☐	☒	☐
e) 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?	☐	☐	☐	☒	☐

		New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
f)	Otherwise substantially degrade water quality?	☐	☐	☐	☒	☐
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒	☐
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒	☐
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒	☐
j)	Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒	☐

(a,c-f) – Substantially Mitigated by Uniformly Applicable Development Policies (Same as Approved Project): The revised project would entirely alter the existing drainage pattern of the project site through demolition of all structures and re-grading to accommodate residential development in a manner comparable to the approved project. The revised project includes advanced stormwater treatment and retention that will prevent erosion, siltation, runoff related flooding, or increases in flow velocity or volume of stormwater runoff, discussed in greater detail in the Infill Environmental Checklist. The changes to the project site as a result of on-site improvements will not substantially alter the existing drainage pattern of the surrounding area, alter the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site.

Additional and/or Revised Mitigation Measures Required: None required

(b) – No Impact (Same as Approved Project): The revised project will continue to be adequately served by the existing water supplies, as confirmed in written correspondence ("will serve" letter") by San Jose Water Company (reference **Attachment 4**), the local area water utility. As such, the project will not deplete or otherwise interfere with groundwater supplies.

Additional and/or Revised Mitigation Measures Required: None required

(g-h) – No Impact (Same as Approved Project): The Federal Emergency Management Agency Flood Insurance Rate Maps, as amended by a Letter of Map Amendment (LOMA) indicates the project is located in Zone X, an area determined to be outside the 500-year (.2%) annual chance floodplain. Therefore, the revised project would not place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.

Additional and/or Revised Mitigation Measures Required: None required

(i-j) – No Impact (Same as Approved Project): The project site is located downstream of Lexington Reservoir, in an area defined by the Association of Bay Area Governments as a dam failure inundation area. As the revised project is not modifying flood protection measures or creating a condition where adjacent properties are exposed to a new significant risk of loss, injury or death involving flooding, no additional exposure to water-related hazards is expected as a result of construction or operation.

Additional and/or Revised Mitigation Measures Required: None required

10. LAND USE and PLANNING

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
a) Physically divide an established community?	☐	☐	☐	☒	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or, natural community conservation plan?	☐	☐	☐	☒	☐

(a) – No Impact (Same as Approved Project): Projects that have the potential to physically divide an established community typically include construction that would eliminate formal or informal travel ways through a property. No such pathways or other forms of informal access through the project site currently exist.

Additional and/or Revised Mitigation Measures Required: None required

(b) – No Impact (Same as Approved Project): The project site covers to land use districts as described by the Campbell General Plan. A core component of the project, the largest parcel of the former Biddle Roofing Company, is designated *High Density Residential (up to 27 units/gr. acre)*. The remainder of the project site is designated *Commercial/Medium-High Density Residential (14-27 units/gr. acre)*, which is subject to the South of Campbell Avenue (SOCA) Plan. The SOCA Plan is designed to encourage the orderly transition of the South of Campbell Avenue area from its historic industrial use to a mixed commercial/residential district, supportive and complementary to Downtown Campbell. Development of the revised project would remain consistent with the General Plan land use designations and with the SOCA Plan. The revised project is also consistent with the General Plan Housing Element, which identified the SOCA Area as an "opportunity site" for new residential development. Lastly, the revised project would also be consistent with the General Plan strategies that relate to support for high density residential development as listed in the Infill Environmental Checklist.

Additional and/or Revised Mitigation Measures Required: None required

(c) – No Impact (Same as Approved Project): No habitat conservation plan or natural community conservation plans are applicable to the project site.

Additional and/or Revised Mitigation Measures Required: None required

11. MINERAL RESOURCES

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
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?	☐	☐	☐	☒	☐
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?	☐	☐	☐	☒	☐
c) Conflict with an adopted energy conservation plan or use non-renewable resources in a wasteful and inefficient manner?	☐	☐	☐	☒	☐

(a-c) – No Impact (Same as Approved Project): No known mineral resources are present at the project site.

Additional and/or Revised Mitigation Measures Required: None required

12. NOISE

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	☒	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒	☐

(a-b) – Substantially Mitigated by Uniformly Applicable Development Policies (Same as Approved Project): The City's Noise Ordinance (CMC Sec. 21.16.070.E) provides numeric noise exposure standards for new residential development. Acoustical studies are required for all new noise-sensitive projects that may be affected by existing noise from stationary sources, including all new residential developments with a noise exposure greater than 60 dBA CNEL. In compliance with this uniformly applicable development policy, an updated acoustical analysis was prepared for the revised

project (reference **Attachment 5**). Based on the analysis, the revised project will be required to incorporate design features to reduce the ambient noise and vibration within the buildings to acceptable levels as defined by the California Building Code (CBC). Outdoor recreational areas will be shielded as necessary to comply with the noise standard. As a result, potential noise-related impacts would be substantially mitigated.

Additional and/or Revised Mitigation Measures Required: None required

(c) – No Impact (Same as Approved Project): Residential developments are classified as sensitive receptors of noise, and to this extent do not themselves generate noise of any appreciable level. As such, the revised project would not result in increase in ambient noise within the vicinity of the project site.

Additional and/or Revised Mitigation Measures Required: None required

(d) – Substantially Mitigated by Uniformly Applicable Development Policies (Same as Approved Project). Construction will eventually result in temporarily increasing ambient noise levels in the project vicinity. However, construction is governed by CMC Sec. 18.04.052, which limits construction activity from 8 AM to 5 PM., Monday through Friday, 9 AM to 4 PM on Saturday, and prohibits construction on Sunday. Additionally, loud environmentally disruptive noise over 50 dBA (e.g., air compressors without mufflers, continuously running motors or generators, loud playing musical instruments or radios) is prohibited. As such, temporary ambient noise level increases associated with construction of the revised will be substantially mitigated.

Additional and/or Revised Mitigation Measures Required: None required

(e-f) – No Impact (Same as Approved Project): The project is not located within the vicinity of an airport land use plan or within two miles of an airport. The revised project is not located within the vicinity of a private airstrip.

Additional and/or Revised Mitigation Measures Required: None required

13. POPULATION AND HOUSING

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
a) Induce substantial population growth in an area either directly or indirectly (e.g. through projects in an undeveloped area or extension of major infrastructure)?	☐	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, especially affordable housing and necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒	☐

(a) – No Impact (Same as Approved Project): The revised project of 118 residential units is consistent with the planned residential densities of the General Plan and does not represent substantial growth inducing impacts. Although the stormwater infrastructure is required to be upgraded (as discussed in Section 17 – Utilities and Service Systems of the Infill Environmental Checklist), it would not result in increased capacities that would induce substantial population growth.

Additional and/or Revised Mitigation Measures Required: None required

(b-c) – No Impact (Same as Approved Project): The revised project will require the demolition of an existing single-family residence that has been vacated, and therefore will not result in the displacement of any people or housing units, which would necessitate the construction of replacement housing elsewhere.

Additional and/or Revised Mitigation Measures Required: None required

14. PUBLIC SERVICES

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
a) 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:					
Fire protection?	☐	☐	☐	☒	☐
Police protection?	☐	☐	☐	☒	☐
Schools?	☐	☐	☐	☒	☐
Parks?	☐	☐	☐	☒	☐
Maintenance of public facilities, including roads?	☐	☐	☐	☒	☐
Other public services or facilities?	☐	☐	☐	☒	☐

(a) – No Impact (Same as Approved Project): The revised project will require public services such as fire, police services, schools, open space, and street maintenance; however, these services are currently provided to all other developments in the area. The revised project will not result in any significant changes to existing services or substantial adverse impacts to public services.

Additional and/or Revised Mitigation Measures Required: None required

15. RECREATION

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
a) 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) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒	☐

(a) – No Impact (Same as Approved Project): The revised project will result in an increase in the use of existing neighborhood and regional parks and other recreational facilities. However, the increase demand for recreational facilities would not be significant and consistent with the planned density for the project and usage of the facilities.

Additional and/or Revised Mitigation Measures Required: None required

(b) – No Impact (Same as Approved Project): The City's Subdivision Ordinance (CMC Sec. 20.24) requires the dedication of land or the payment of an in-lieu fee as a condition of approval for the Tentative Subdivision Map. The City's Standard is three acres of open space, parkland and recreational facilities and one acre of school open space and recreational facilities for every 1,000 residents. The City's Open Space Element prioritizes the acquisition and development of open space sites in neighborhoods which are deficient in open space and park acreage. The City's access standard is to provide open space, parks, or recreation facilities within one-half mile radii of all City residents. The project site is located within one half-mile of Campbell Park and the Los Gatos Creek Trail; therefore, the residents of the revised project are anticipated to use the existing facilities and the dedication of on-site parkland will not be required. The project sponsor is required to pay a Park Impact Fee for the development of the revised project and this fee will be used for the acquisition, improvement and/or expansion of parks and recreational facilities within the City.

Additional and/or Revised Mitigation Measures Required: None required

16. TRANSPORTATION and CIRCULATION

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system including, but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☐	☒	☐
c) Result in any rail, waterborne or air traffic impacts?	☐	☐	☐	☒	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	☒	☐

(a-b) – No Impact (Same as Approved Project): As required by the regional Congestion Management Program (CMP), the City contracted for preparation of a traffic impact analysis (TIA) for the approved project. The purpose of this study was to determine what affect the approved project would have on traffic along adjacent roadways and intersections. Although the approved project proposed 100 units, the TIA assumed 110 residential units to account for the potential expansion of the project. Accounting for existing traffic trips associated with current businesses on the project site, the total *additional* trips over current levels (i.e., net increase) for the approved project would be 406 daily trips, including 17 during the AM peak hour and 24 during the PM peak hour. According to the study, the increase in trips represents an incremental increase in traffic that would not result in a level of service (LOS) reduction at nearby intersections.

The revised project proposes 118 units, for a net increase of eight units over what had been analyzed by the TIA. The addition of eight units would generate an additional 42 daily trips, including 3.2 during the AM peak hour and 4.1 during the PM Peak hour, *not* accounting for existing land uses to be removed. As such, the net increase in traffic generation that would be created by the revised project is below local and regional thresholds for formal analysis, and can be considered insignificant. As a result, the revised project would not conflict with applicable congestion management program or other applicable plans, ordinances or policies establishing measures of effectiveness for the performance of the circulation system.

Additional and/or Revised Mitigation Measures Required: None required

(c) – No Impact (Same as Approved Project): The revised project would not affect any rail, waterborne, or air traffic.

Additional and/or Revised Mitigation Measures Required: None required

(d-e) – No Impact (Same as Approved Project): The TIA reviewed the project's internal vehicular circulation and emergency access and determined it to be acceptable. The revised project's circulation would remain substantially the same as the approved. The Fire Department has also determined the site circulation and roadway configuration for the revised project would provide adequate emergency access.

Additional and/or Revised Mitigation Measures Required: None required

(f) – No Impact (Same as Approved Project): The revised project is a transit-oriented development in that it will be located within ¼ mile of the Downtown Campbell light-rail station, as well as Downtown Campbell. The development of a higher density residential infill project in proximity to high quality transit and the City center is consistent with the applicable policies of the Campbell General Plan. As such, the revised project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Additional and/or Revised Mitigation Measures Required: None required

17. UTILITIES and SERVICE SYSTEMS

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒	☐
e) 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?	☐	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒	☐

(a-b,e) – No Impact (Same as Approved Project): The utilities for the revised project, including sewage disposal, would require the construction of a private sanitary system that would connect to the

existing waste water treatment system, which currently has sufficient capacity to receive the additional waste water generated from the proposed project. Therefore, the revised project would not impact the ability of the waste water treatment provider to meet its current commitments for service. The revised project would not generate significant amounts of wastewater, and would therefore not exceed wastewater treatment requirements for the Regional Water Quality Control Board. The West Valley Sanitation District has provided written correspondence ("will serve" letter) which indicates that the sewer facilities, with the construction of on- and off-site improvements, are adequate to support the revised project (reference Attachment **4**).

Additional and/or Revised Mitigation Measures Required: None required

(c) – No Impact (Same as Approved Project): As noted in the Infill Environmental Checklist, the project stormwater runoff generated by the project site would be collected and treated on-site in compliance with Provision C.3 of the National Pollution Discharge Elimination System (NPDES) requirements as discussed in Section 9 (Hydrology and Water Quality). Treated stormwater will directed either to the existing public roadway system within the street or to an existing creek outfall located on the adjacent Public Works Maintenance Corporation Yard (accessed through an easement agreement with the City).

Additional and/or Revised Mitigation Measures Required: None required

(d) – No Impact (Same as Approved Project): The revised project will be adequately served by the existing water supplies, as confirmed in written correspondence ("will serve" letter) by San Jose Water Company (reference **Attachment 4**), the local area water utility.

Additional and/or Revised Mitigation Measures Required: None required

(f-g) – No Impact (Same as Approved Project): Existing capacity at local landfills can accommodate the amount of waste generated as a result of the revised project. The project would comply with Federal, State and local statutes and regulations related to solid waste.

Additional and/or Revised Mitigation Measures Required: None required

18. MANDATORY FINDINGS OF SIGNIFICANCE

	New Potentially Significant Impact	New Less Than Significant w/ Mitigation Incorporated	New Less Than Significant Impact	Same Impact as "Approved Project"	Less Impact than "Approved Project"
Would the project:					
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) – No Impact (Same as Approved Project): Based on the findings of the Infill Environmental Checklist Form and this Addendum, construction and operation of the revised project, with previously adopted mitigation, would not substantially degrade the quality the environment; reduce the habitat, population, or range of species; nor eliminate important examples of California history or prehistory.

(b) – No Impact (Same as Approved Project): The revised project would not cause any significant cumulative impacts to the following topical issues:

Traffic congestion at study intersections. The Traffic Impact Analysis (TIA) prepared for the approved project evaluated the operating conditions of key study intersections for existing, background, project, and cumulative traffic conditions. Based on the results of the TIA, all study intersections are projected to operate at acceptable levels for each traffic condition. The addition of a net increase of eight units over what had been assumed in the TIA would represent an insignificant increase in traffic levels.

Land Use and Planning. The revised project in combination with any development activity in the vicinity would not induce growth, because the project alone would not induce growth.

Geologic Problems. Seismic and soil conditions are site-specific, and will not contribute to cumulative impacts.

Water. Water run-off and water quality are site-specific, and will not contribute to cumulative impacts.

Air Quality. Another development project in the vicinity of the project site has recently been approved. However, as both projects include mitigation measure relevant to construction activity, the cumulative air quality impact will be less than significant.

Biological Resources. The potential biological resource impacts discussed are site-specific, and will not contribute to cumulative impacts.

Energy. The revised project would have no impact on energy and mineral sources, so it would not contribute to cumulative impacts.

Hazards. All hazards discussed are site specific, and will not contribute to cumulative impacts.

Noise. Construction activity is substantially mitigated through uniform development policies on a project-by-project basis and therefore cannot result in a cumulative impact.

Public Services. Since the revised project would not make any significant demands on public services, it would not contribute to cumulative impacts to public services.

Utilities/Service Systems. Since the revised project would have less than significant or no impacts to public utilities, it would have no cumulative impact.

(C) – No Impact: Based on the findings of the Infill Environmental Checklist Form and this Addendum, there is no evidence to demonstrate that the revised project would cause a substantial adverse effect on human beings, either directly or indirectly. Additionally, based on the findings of the Infill Environmental Checklist Form and this Addendum, construction and operation of the revised project, with mitigation, the project would not substantially degrade the quality the environment; reduce the habitat, population, or range of species; nor eliminate important examples of California history or prehistory.

SUMMARY OF ADDITIONAL AND/OR REVISED MITIGATION MEASURES

1. **Aesthetics**: None Required
2. **Agricultural Resources**: None Required
3. **Air Quality**: None Required
4. **Biological Resources**: None Required
5. **Cultural Resources**: None Required
6. **Geology and Soils**: None Required
7. **Greenhouse Gas Emissions**: None Required
8. **Hazards and Hazardous Materials**: None Required
9. **Hydrology and Water Quality**: None Required
10. **Land Use and Planning**: None Required
11. **Mineral Resources**: None Required
12. **Noise**: None Required
13. **Population and Housing**: None Required
14. **Public Services**: None Required
15. **Recreation**: None Required
16. **Transportation and Traffic**: None Required
17. **Utilities and Service Systems**: None Required
18. **Mandatory Findings of Significance**: None Required

REFERENCE MATERIALS

New Attachments (May be viewed online on the City of Campbell 'Public Notices' web page (http://www.cityofcampbell.com/501/Public-Notices) under 'Environmental Notices' or at the Campbell Community Development Department office (70 N First St., Campbell, CA 95008) during normal business hours).

1. *Coast Live Oak Sustainability Assessment* by Richard Gessner, dated December 21, 2014
2. *Geotechnical Letters (2)*, by Pacific Geotechnical Engineering, dated July 27, 2015 and September 21, 2015
3. *Phase I Environmental Site Assessment and Subsurface Soil Investigations (2)* by ENVIRON International Corp., dated April 23, 2015 and May 14, 2015
4. *"Will Serve" Letters (PG&E, San Jose Water, and West Valley Sanitation District, and West Valley Collection and Recycling)*
5. *Draft Environmental Noise Feasibility Study* by Salter Associates, Inc., dated June 2, 2015

Reference Documents:

1. Bay Area Air Quality Management District (BAAQMD), June 2010, *CEQA Air Quality Guidelines*.
2. Bay Area Air Quality Management District (BAAQMD), December 2008, *Source Inventory of Bay Area Greenhouse Gas Emissions*.
3. California Environmental Protection Agency (CEPA) California Air Resources Board (CARB), April 2005, *Air Quality and Land Use Handbook: A Community Health Perspective*.
4. California Environmental Protection Agency (CEPA) California Air Resources Board (CARB), November 16, 2007, *Staff Report: California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit*.
5. California Natural Diversity Database, 2000.
6. California Office of Planning and Research (OPR), June 19, 2008, *Technical Advisory: CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*.
7. CEQA Guidelines, 2012 version.
8. City of Campbell General Plan.
9. Campbell General Plan EIR.
10. City of Campbell Zoning Code.
11. Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Community Map Number 06085C0241H, Effective Date May 18, 2009.
12. State of California, Seismic Hazard Zones Map, San Jose West Quadrangle, February 2002.
13. U.S. Environmental Protection Agency, April 15, 2009, *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2007*.

ATTACHMENT 1

COAST LIVE OAK SUSTAINABILITY ASSESSMENT

December 21, 2014

Mr. Michael Enderby
Robson Homes, LLC
2185 The Alameda, Suite 150
San Jose, CA 95126

Monarch Consulting Arborists LLC
P.O. Box 1010
Felton, CA 95018
831. 331. 8982

Regarding the coast live oak (*Quercus agrifolia*) located on 240 Dillon Avenue in Campbell (Photo 1).

On December 19, 2014 at 12:00 PM I inspected the crown, trunk, trunk flare, above ground roots, and site conditions around the coast live oak following the guidelines published in the *ANSI A300 (Part 9)-2011 Tree Risk Assessment a. Tree Structure Assessment* and *ANSI A300 (Part 5) Management of Trees and Shrubs During Site Planning, Site Development, and Construction* to assess the tree's condition and suitability for preservation. No tree risk assessment was performed.

The purpose of this report is to inform the property owners or managers about the condition of the tree and help determine whether or not it is suitable to be retained in a property development situation. The report is to be used by Robson Homes, LLC, their agents, and the City of Campbell to help make decisions about the future management of the tree.

The coast live oak has a trunk diameter of 34 inches at 4 feet above grade and is approximately 40 feet tall. The crown spreads approximately 15 feet in all directions and foliar size, color, and density are normal for the species. The tree has a live crown ratio of approximately 50 percent. All the branches have been headed back or topped to create a uniform unnatural rounded crown appearance. The crown consists primarily of adventitious branches that have sprouted from the heading or topping cuts and they all originate from three primary scaffold branches. The trunk is straight and void of foliage with several wounds, abnormal bark growth and color, and some exposed heartwood. There are two cankers on the lower trunk and some black oozing from a mechanical wound on the lower stem. The trunk flare is buried and there are no visible buttress roots, structural roots or above ground roots. The soil surface under the tree is covered in weed abatement material and medium sized cobbles. There is limited soil volume and the potential root zone, including the area within the drip line, is covered in concrete.

Photo 1: Coast Live Oak on 240 Dillon Avenue

A tree's condition is a determination of its overall health and structure based on five aspects: roots, trunk, scaffold branches, twigs, and foliage. The assessment considered both the health and structure of the tree for a combined condition rating. The crown, trunk, trunk flare, and above ground roots were inspected from the ground (Tree Care Industry Association, 2011). The tree is in fair condition with at least one structural defect or health concern. The topped branches in the crown have created the need to continually maintain the tree by arbitrarily reducing the crown size or length of branches. If the tree is retained and not continually maintained the adventitious branches will grow larger and become prone to tearing off because of there weak attachments. Conversely, a restoration pruning regime would be expensive and time consuming.

A tree's suitability for preservation is determined based on its health, structure, age, species characteristics, and longevity using a scale of good, fair, or poor. The tree is poorly suited for preservation because the individual specimen is unsuited for the intended future use of the site (Tree Care Industry Association, 2012). Because the tree has been poorly managed and the damage from arbitrarily pruning the tree to a predetermined crown size would require extensive future management, the tree is not suitable to retain. There are signs of disease with a canker on the main stem as well.

In conclusion the tree is in fair condition but poorly suited for preservation. The conditions and defects the tree processes cannot be reasonably mitigated without extensive intervention over a long period of restoration pruning. The canker on the lower stem may be an indication of greater stem or root zone issues.

If the property is to be redeveloped I recommend removing the tree and focusing resources on replanting and establishing better specimens, in desired locations, with a greater overall contribution and value to the community.

Richard J. Gessner

ASCA Registered Consulting Arborist® #496
ISA Board Certified Master Arborist® WE-4341B
ISA Tree Risk Assessor Qualified

American national standard for tree care operations: tree, shrub and other woody plant management : standard practices (Tree risk assessment a. Tree structure assessment). Londonderry, NH: Secretariat, Tree Care Industry Association, Inc., 2011. Print.

American National Standard for Tree Care Operations: Tree, Shrub and Other Woody Plant Management : Standard Practices (Management of Trees and Shrubs During Site Planning, Site Development, and Construction)(Part 5). Londonderry, NH: Secretariat, Tree Care Industry Association, 2012. Print.

ATTACHMENT 2

GEOTECHNICAL LETTERS (2)

Geo-Logic ASSOCIATES

PACIFIC GEOTECHNICAL ENGINEERING

July 27, 2015
Project 2014.0005

Richard Yee
Robson Homes
2185 The Alameda, Suite 150
San Jose, California 95126

Subject: Slope Stability Assessment for Proposed Stormwater Infiltration Systems
Dillon Avenue Project, Phase 1, Campbell, California

Dear Mr. Yee,

As requested, we have evaluated the overall stability of the western Los Gatos Creek bank adjacent to the proposed CUDO stormwater treatment systems to be installed during Phase 1 of the residential development on Dillon Avenue. We understand water will be allowed to infiltrate into the underlying soils only through the bottom of the CUDO systems. Water will not be allowed to pass through the sides of the CUDO systems.

As shown on Sheet C8 prepared by Civil Engineering Associates, dated July 17, 2015, two CUDO systems (TCM#1 and TCM#2) are proposed along the southeastern property line and north of the City of Campbell Corporation Yard. The southern chamber TCM#1 will be about 58 feet in length and 6 to 12 feet in width. The northern chamber TCM#2 will be about 54 feet in length and 4 feet in width. For both TCM#1 and TCM#2, the top of chamber will be at elevation 185.5 feet and the bottom of chamber will be at elevation 181.5 feet.

A shorter system, TCM#4, shown on Sheet C6 prepared by Civil Engineering Associates, dated July 17, 2015, is proposed in the northeastern portion of the property. This system, adjacent to Unit 24, Building 5, will be approximately 16 feet in length and 6 feet in width, with top of chamber elevation of 191 feet and bottom of chamber elevation of 187 feet. This system will be located about 45 feet from the top of the western creek bank.

STABILITY ANALYSIS

Stability analysis was performed using the 2-dimensional computer software SLIDE by Rocscience (version 6.0). This program has a built-in finite element ground water seepage analysis which we used to determine the phreatic surface for steady state groundwater conditions. Circular search routine was used, employing the simplified Bishop and Janbu methods, both of which are limit equilibrium methods.

For our analysis, we developed a cross-section through TCM#1 in the southeastern portion of the project, using topographic information shown on the civil engineering drawings. Soil properties were developed based on subsurface information we collected at the site. The soil properties used in our analysis are tabulated below.

Material Type	Elevation (feet)	Soil Property			
		Unit Weight (pcf)	Friction Angle (degrees)	Cohesion (psf)	Coefficient of Permeability (ft/sec)
Engineered Fill	187.35-189	120	33	100	$1x10^{-6}$
Silt/Clay	182-187.5	110	25	1000	$1x10^{-6}$
Clayey Sand with Gravel	173-182	122	35	50	$1x10^{-5}$
Clayey Gravel with Sand	130-173	125	35	50	$1x10^{-5}$
Gravel	CUDO system	125	35	0	$1x10^{-1}$
Rubble	177.5-185.5	100	35	0	$1x10^{-1}$

Note: A seismic coefficient of 0.15 was selected for the seismic (pseudo-static) analysis. Also, for seismic analysis, the friction angle of the silt/clay layer is set to zero for undrained condition. Seismic analysis was performed on low creek flow condition because the probability of an earthquake occurring during flood events is low (US Army Corps of Engineer).

The conditions we analyzed and the calculated factors of safety are tabulated below.

Condition Analyzed	Calculated Factor of Safety	Minimum Required Factor of Safety
Low creek flow, static	1.86	1.5
Low creek flow, seismic S=0.15	1.27	1.0-1.2(1)

Note: 1. Typical value accepted in the geotechnical profession for non-liquefaction sites. For liquefaction sites, a more detailed seismic deformation analysis is required if the seismic factor of safety is less than 1.2 (USACE EC 1110-2-6067).

CONCLUSIONS

As shown in the table above, the calculated factors of safety exceed the minimum factors of safety for both the static and seismic (pseudo-static) cases. The section analyzed is considered representative of TCM#1 and TCM#2 because the conditions are similar.

The potential for TCM#4 to significantly impact the western creek bank is low because TCM#4 is located about 45 feet from the top of the creek bank.

Based on our subsurface exploration for this project, soil at the invert of the Cudo chambers is anticipated to be clayey sand with gravel. Our percolation testing at the site measured percolation rate ranging from less than 0.07 minute per inch to 4.9 minute per inch (12 inches per hour). We understand the Cudo system was designed using a percolation rate of 5 inches per hour. At the time of construction, the geotechnical engineer should observe the exposed bottom of the Cudo system to verify the suitability of the material for percolation.

LIMITATIONS

Our services were performed using generally accepted engineering approaches and principles available at this time and the degree of care and skill ordinarily exercised under similar circumstances by reputable geotechnical engineers practicing in this area. No warranty or guarantee, express or implied, is included or intended.

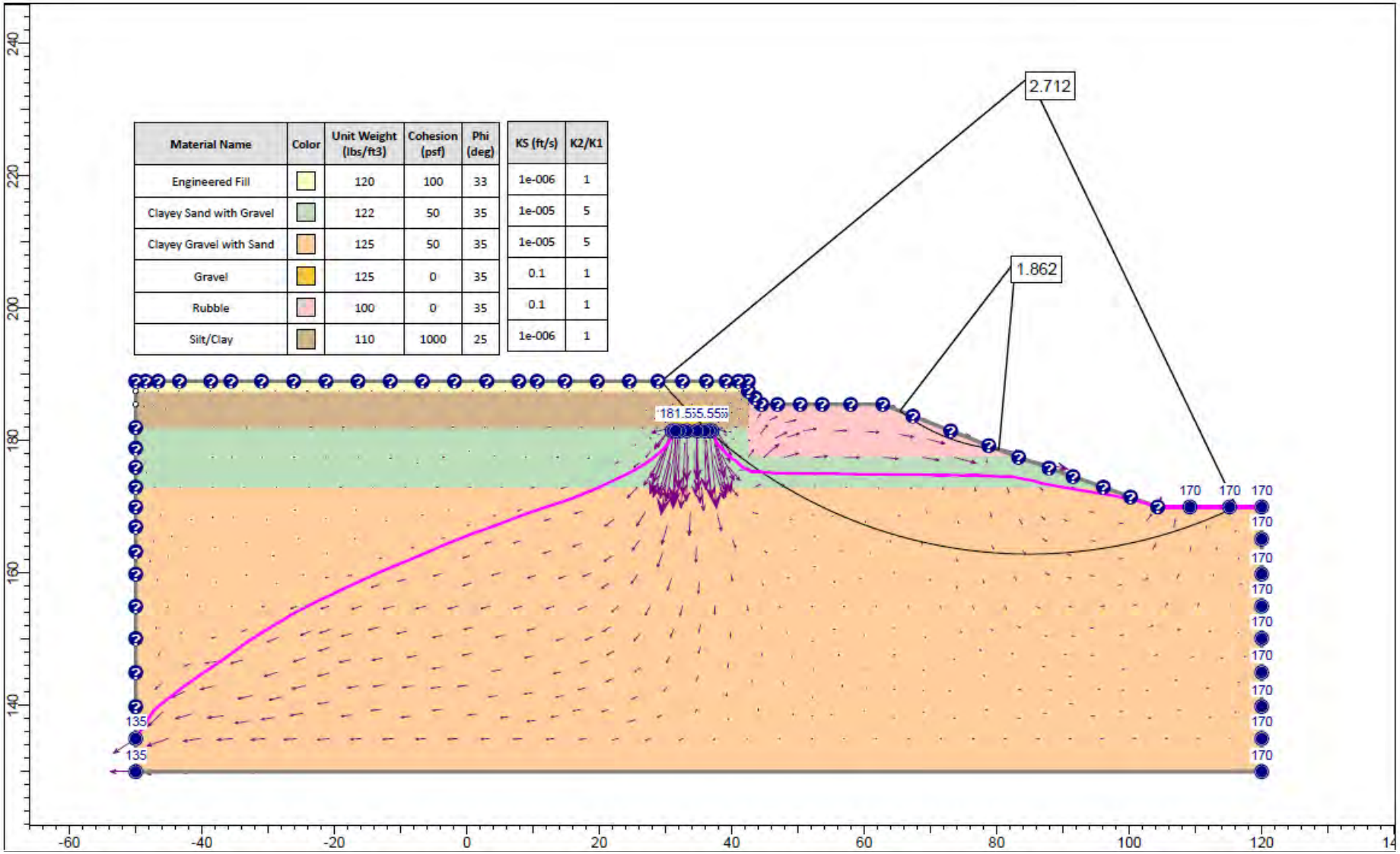
Sincerely,

Geo-Logic Associates dba Pacific Geotechnical Engineering

Chalerm (Beeson) Liang
GE 2031

Attachment: Slope Stability Analysis Results (2 sheets)

Copies: addressee (3)



Material Name	Color	Unit Weight (lbs/ft3)	Cohesion (psf)	Phi (deg)	KS (ft/s)	K2/K1
Engineered Fill		120	100	33	1e-006	1
Clayey Sand with Gravel		122	50	35	1e-005	5
Clayey Gravel with Sand		125	50	35	1e-005	5
Gravel		125	0	35	0.1	1
Rubble		100	0	35	0.1	1
Silt/Clay		110	1000	25	1e-006	1

Geo-Logic ASSOCIATES
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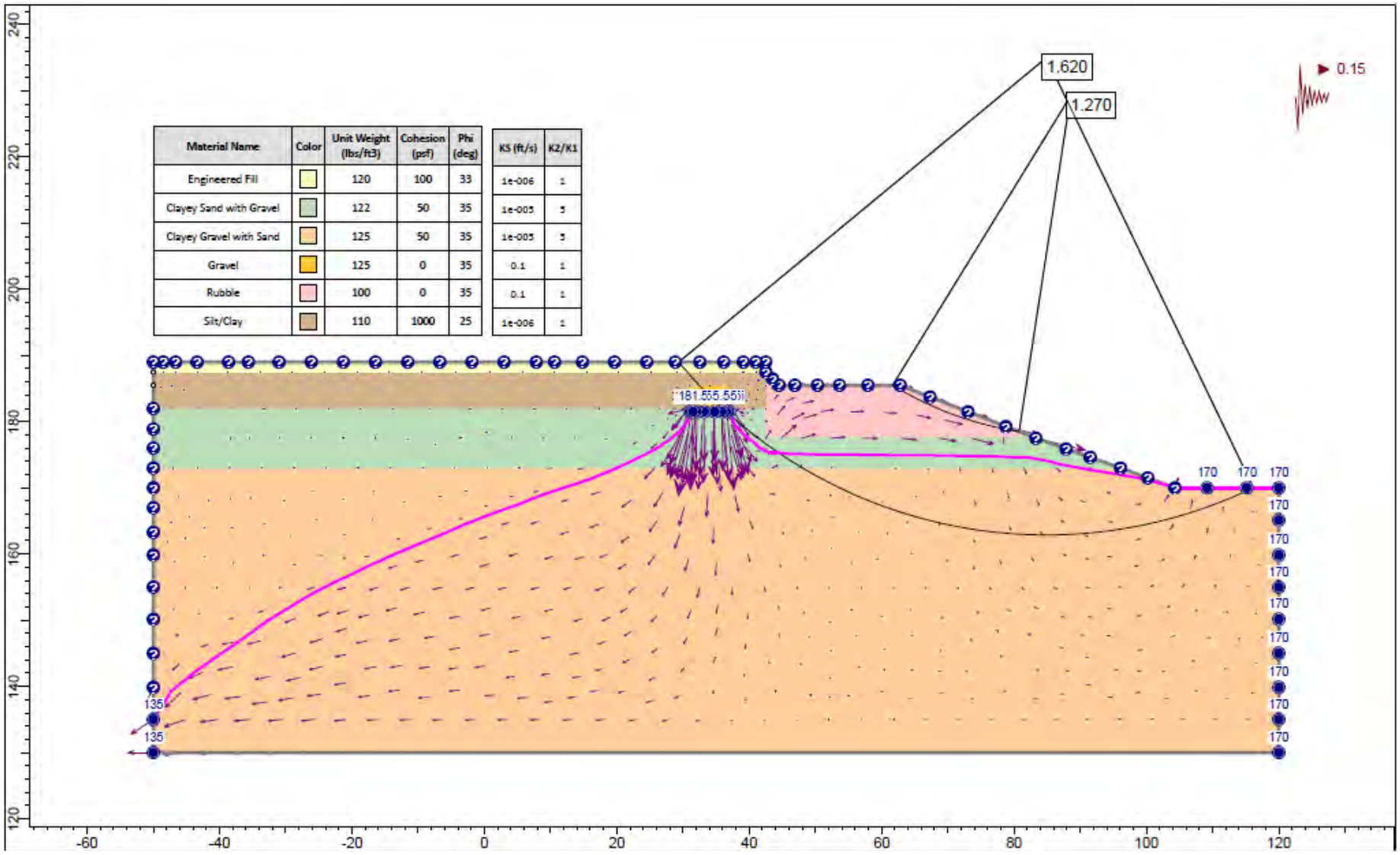
Fax (408) 779-6879

Drafted By:	
Date:	7/24/2015
Checked By:	
Revision:	

SLOPE STABILITY ASSESSMENT (STATIC CONDITION)
DILLON AVENUE PHASE I PROJECT
CAMPBELL, CALIFORNIA

FIGURE
1
PROJECT
2014.0005



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Drafted By:	
Date:	7/24/2015
Checked By:	
Revision:	

SLOPE STABILITY ASSESSMENT
(PSEUDO-STATIC CONDITION)
DILLON AVENUE PHASE I PROJECT
CAMPBELL, CALIFORNIA

FIGURE
2
PROJECT
2014.0005

Geo-Logic ASSOCIATES

PACIFIC GEOTECHNICAL ENGINEERING

September 21, 2015
Project 2014.0005

Michael Enderby
Robson Homes
2185 The Alameda, Suite 150
San Jose, California 95126

Subject: Cudo System North of Building 13
Dillon Avenue Project, Campbell, California

Dear Mr. Enderby,

As requested, we have prepared this letter to address the Cudo system to be installed north of Building 13 of the subject development, in response to the following City review comments.

Geotechnical Letter: The included letter from Pacific Geotechnical Engineering, dated May 23, 2014, does not address the new infiltration trench proposed within the expanded development. The Geotechnical Engineer needs to confirm the following: that the location adjacent to the retaining wall is appropriate and will not compromise the wall; that the soils in this area are suitable for infiltration; and finally that the location of the infiltration trench is in compliance with the requirements of Appendix A of the SCVURPPP C3 Handbook.

PROJECT UNDERSTANDING

We understand the City comments above pertain to the proposed Cudo system north of Building 13. This Building 13 is a six-unit townhouse complex east of Apartment Building B and south of an existing development on 200 Dillon Avenue. The proposed finished floor elevation of Building 13 will be at about 198.90 feet, with Apartment Building B at about 201.00 feet. Existing ground surface elevation in the southern portion of the 200 Dillon Avenue parcel is about 200 feet.

As presently planned, the Cudo system will be about 14 feet wide and 28 feet long, with its top at elevation 193.8 feet and its bottom at elevation 189.8 feet. The system will be sited about 18 feet north of Building 13, about 19 feet east of Apartment Building B, and about 6 feet from a proposed retaining wall along the south side of the 200 Dillon Avenue parcel. This retaining wall section will have a top-of-wall elevation of 200 feet and bottom-of-wall elevation ranging from 198.50 feet (west end) to 195.00 feet (east end).

RESPONSES TO CITY COMMENTS

1. Influence of Cudo System on Adjacent Structures

Based on the current design, the proposed Cudo system is outside of the influence zone of the foundations of Building 13 and Building B, but within the influence zone of the retaining wall along the south side of the 200 Dillon Avenue parcel. Foundations for this retaining wall should

consist of drilled, cast-in-place, reinforced concrete piers to transfer the foundation loads to deeper soils below the influence zone. The upper portion of the piers above an imaginary line projecting up at a 45-degree inclination from the bottom corner of the Cudo system should be ignored in the design.

2. Suitability of Soils for Infiltration

Subsurface soils in the vicinity of the Cudo system north of Building 13 consist generally of lean clay with sand to a depth of about 7 feet (roughly elevation 193 feet) and clayey sand with gravel to at least a depth of about 19½ feet (roughly elevation 180.5 feet). At an invert elevation of 189.8 feet, the Cudo system is expected to be founded on clayey sand with gravel which, in our opinion, is considered suitable for water infiltration.

3. Is Infiltration Trench Location in Compliance with Appendix A of SCVURPPP C3 Handbook

Table A-1 of SCVURPPP C3 Handbook Appendix A provides required horizontal setbacks for stormwater infiltration devices. For residential subdivision larger than 1 acre, the following setback requirements were obtained from the Table A-1. Our comments below are extracted or based on the report titled "Phase I Environmental Site Assessment and Subsurface Investigation, 240 and 250 Dillon Avenue, APN 412-08-033, Campbell, CA," prepared by Ramboll Environ, dated May 14, 2015.

Features	Required Horizontal Setbacks (feet)	Comments
Drinking Water Wells	600	18 state-registered wells and 8 federally-registered wells are present within one mile of the site; none are registered as public water supply wells.*
Septic Systems	100	There are no known current or former septic tanks at the site.*
Underground Storage Tanks	Dependent upon depth to water	A 5,000-gallon underground storage tank (UST) on the site was reportedly removed in 1987. Laboratory test results on soil samples collected beneath the former UST did not report TPH fractions of gasoline, diesel, or motor oil greater than respective laboratory reporting limits.* There are other USTs nearby, such as on the City of Campbell Corporation Yard site. Please refer to the Environ report dated May 14, 2015.*
Known Contamination Site	1,500	Please refer to the Environ report dated May 14, 2015.*
Vertical Separation from Seasonally High Groundwater	10	Groundwater is expected to be at least 50 feet below ground surface

* Comments based on Environ report dated May 14, 2015.

LIMITATIONS

Our services were performed using generally accepted engineering approaches and principles available at this time and the degree of care and skill ordinarily exercised under similar circumstances by reputable geotechnical engineers practicing in this area. No warranty or guarantee, express or implied, is included or intended.

Sincerely,

Geo-Logic Associates dba Pacific Geotechnical Engineering

Chalerm (Beeson) Liang
GE 2031

Copies: addressee (3)

ATTACHMENT 3

PHASE 1 ENVIRONMENTAL SITE ASSESSMENTS (2)



Phase I Environmental Site Assessment and Subsurface Soil Investigation

260 and 272 Dillon Avenue
APNs 412-08-032 and 412-08-031
Campbell, CA

Prepared for:

Robson Homes, LLC
San Jose, CA

Prepared by:
ENVIRON International Corporation
Emeryville, CA

Date:
April 23, 2015

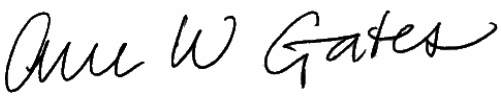
Project Number:
03-21676AA

ENVIRON

Signature and Environmental Professional Statement

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR §312.10.

Further, I have the specific qualifications based on education, training, and experience to assess a property of the nature, history and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Anne W. Gates, P.E.

ENVIRON International Corporation
2200 Powell Street, Suite 700
Emeryville, CA

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Appendices

1 Summary of Conclusions

ENVIRON International Corporation (ENVIRON) was retained by Robson Homes, LLC ("Robson Homes") to perform a Phase I Environmental Site Assessment (ESA) and subsurface soil investigation of the properties located at 260 and 272 Dillon Avenue in Campbell, California (herein referred to as the "site" or "property"). ENVIRON's assessment was conducted in connection with the purchase of the property. The ESA described in this report was performed in general conformance with the scope and limitations of the ASTM International's *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* E-1527-13 (the "ASTM Standard"), as stated in Chapter 2.0 (Introduction). Any exceptions to, or deletions from, this practice are described in Section 7.3 of this report.

1.1 Recognized Environmental Conditions

ENVIRON did not identify any "recognized environmental condition[s]" (REC[s]), as defined by ASTM (see Chapter 2.0), in connection with residential use of the property. No further investigation of the site is warranted at this time.

1.2 Other Findings

Although not considered RECs based on currently available information, ENVIRON identified the following other findings:

- **Elevated Lead and Organochlorine Pesticides (OCPs) in Localized Area at 272 Dillon**. Although there were three soil sample locations, SB-11, SB-12 and SB-13, where concentrations of lead and OCPs were slightly above regulatory screening levels (RSLs) for residential land use, additional sampling and testing showed that these areas are very limited in horizontal and vertical extent and may be related to lead-based paint and historical termite treatment on the adjacent residential building. It is anticipated that as part of site redevelopment, shallow soil in the vicinity of these samples will be stripped and deeper soil mixed as part of site grading activities. Through the stripping and grading process, the lead and OCP concentrations in this area will be decreased significantly and therefore, the lead and OCP in soil does not represent a significant hazard to future site residents.
- **Elevated Lead in Localized Area at 260 Dillon**. Although there were two soil sample locations, SB-06 and SB-08, where concentrations of lead were above RSLs for residential land use, additional sampling and testing showed that these areas are very limited in horizontal and vertical extent and may be related to historical use of lead-based paint. It is anticipated that as part of site redevelopment, shallow soil in the vicinity of these samples will be stripped and deeper soil mixed as part of site grading activities. Through the stripping and grading process, the lead concentrations in this area will be decreased significantly and therefore, the lead in soil does not represent a significant hazard to future site residents.
- **Underground Storage Tank Removal at the Site.** ENVIRON reviewed historical documents relating to the removal of a 5,000-gallon gasoline underground storage tank (UST) at the 260 Dillon Avenue parcel. The UST was installed in 1981 and located in the

northern portion of the 260 Dillon Avenue parking lot. A leak monitoring system was installed in 1986. An Inspection Notice from Santa Clara County Fire Department (SCCFD) indicates the UST and associated piping and fuel pump were removed on January 22, 1998. The UST was reportedly slightly corroded, though no discolorations or odors were observed in the soil beneath the UST and associated piping and fuel pump. Two soil samples were collected beneath the UST and one soil sample was collected beneath the associated piping. Analytical results of the soil samples did not detect TPH as gasoline (TPH-g), methyl tert-butyl ether (MTBE), or benzene, toluene, ethylbenzene, and xylenes (BTEX) above laboratory reporting limits. SCCFD issued case closure on February 10, 1998. Based on available information, the former UST located at 260 Dillon Avenue is not considered to be of concern for the site.

De minimis conditions, as defined in Chapter 2.0, along with other site conditions observed during the site visits, are discussed within relevant sections of this report and are summarized in Chapter 7.0.

2 Introduction

2.1 Purpose

ENVIRON was retained by Robson Homes to conduct a Phase I ESA and subsurface soil investigation of the properties located at 260 and 272 Dillon Avenue (Assessor's Parcel Numbers [APNs] 412-08-032 and 412-08-031, respectively) in Campbell, California. ENVIRON's assessment was conducted in connection with the purchase of the property. The purpose of the assessment was to identify RECs, which are defined in the ASTM Standard as:

> "The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not recognized environmental conditions."

2.2 Scope of the Phase I ESA

ENVIRON completed the following tasks, consistent with the ASTM Standard, during its Phase I ESA of the property:

- A visit to the site by Jason Kane of ENVIRON on March 13, 2015 to observe the features of the site and to identify the uses and conditions specified in the ASTM Standard. During the site visits, ENVIRON observed the adjoining properties from the site or adjacent public thoroughfares. Photographs taken during the site visits are presented in Appendix A.
- Personal interviews during the site visit on March 13, 2015 with John Haines, owner of 260 Dillon Avenue since approximately 2013, and Gabriel Young, co-owner of 272 Dillon Avenue since approximately 2010. Mr. Haines and Mr. Young are herein referred to as "site personnel". The site personnel interviewed by ENVIRON were identified as having good knowledge of the current and historical uses and physical characteristics of the site.
- A review of information contained in federal and state environmental databases, as obtained from the sources noted below:
  - A radius report prepared by Environmental Data Resources, Inc. (EDR) on September 2, 2014 for the site and off-site properties in the vicinity of the site. The search was performed as part of a similar ESA conducted for Robson Homes at a nearby property (290 Dillon Avenue, located approximately 50 feet to the south of the site). A copy of the EDR radius report is included as Appendix B. The databases and the radius searched for each database were selected in accordance with the ASTM Standard and are identified in the EDR database report. The dates of the most recent updates of the environmental databases are also listed in the database report.
  - The United States Environmental Protection Agency's (USEPA's) Envirofacts database, which provides site information contained in multiple USEPA regulatory databases.
  - The USEPA's Enforcement and Compliance History Online (ECHO) database, which provides information on sites' enforcement and compliance history.

- The State of California's Regional Water Quality Control Board (RWQCB) Geotracker online database and the California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC) Envirostor online database.

- A review of the EDR Environmental Lien Search Report dated March 16, 2015 to identify environmental liens or activity use limitations (AULs) imposed by judicial authorities with respect to the property.
- A review of standard historical sources (included as Appendix C) and local agency inquiries, as defined in the ASTM Standard. The following resources were reviewed:
  - Readily available historical sources, including (where available) historical topographic maps and aerial photographs, city directories, and Sanborn Maps, to develop a history of the previous uses of the site and surrounding area.
  - Historical and site-specific information obtained from the following local agencies: Santa Clara County Assessor's Office (Assessor), SCCFD, and the City of Campbell Building Division (Building Division). ENVIRON also requested files from the Santa Clara County Environmental Health Department (SCCDEH) and the Santa Clara Valley Water District (SCVWD).
  - Telephone interview with a representative of the SCCFD regarding historical records available for the site. ENVIRON was informed that records were found for the property and could be provided through a file review, which ENVIRON performed.
  - A review of microfiche files was performed by ENVIRON on March 13, 2015 at the Building Division office. ENVIRON also performed an online review of additional Building Division records.
- A review of physical setting sources, as defined in the ASTM Standard, including:
  - The current USGS 7.5-minute topographic map that shows the area on which the site is located.
  - Geologic, hydrogeologic, or hydrologic sources as provided in the EDR report.
- Information gathered as part of the following ESAs conducted by ENVIRON for Robson Homes at properties adjacent to and in the vicinity of the site:
  - *Phase I Environmental Site Assessment and Subsurface Soil Investigation, 240 Dillon Avenue, Campbell, California, February 5, 2015.* 240 Dillon Avenue is located adjacent to the north of the site.
  - *Phase I Environmental Site Assessment, 230, 280, and 282 Dillon Avenue, Campbell, California, November 24, 2014.* 230 Dillon Avenue is located approximately 100 feet north of the site. 280 and 282 Dillon Avenue are located adjacent to the south and east of the site.
  - *Phase I Environmental Site Assessment and Soil Investigation, Portion of 290 Dillon Avenue, Campbell, California, November 25, 2014.* 290 Dillon Avenue is located approximately 50 feet to the south of the site.

  - *Phase I Environmental Site Assessment and Subsurface Soil Investigation, 190 Dillon Avenue, Campbell, California, June 2014.* 190 Dillon Avenue is located approximately 300 feet to the northeast of the site.
  - *Phase I Environmental Site Assessment and Subsurface Soil Investigation, Haig Precision Manufacturing Corporation, 186 Gilman Avenue, 186 Dillon Avenue, and 426 Sam Cava Lane, Campbell, California,* February 11, 2015. The Haig properties are located approximately 350 feet to the northeast of the site.
  - *Phase I Environmental Site Assessment and Subsurface Soil Investigation, 466, 472, 482, 488, Sam Cava Lane, Campbell, California, May 23, 2014.* The Sam Cava Lane properties are located approximately 450 feet to the northeast of the site.
- A review of the results of a geophysical investigation conducted by JR Associates in March 2015.
- Visits to the site on March 10 and 27, 2015 for collection of environmental samples.
- A review of the following documents provided by Robson Homes:
  - The *ALTA/ASCM Land Title Survey for 280 Dillon Avenue*, prepared by Civil Engineering Associates (CEA), dated April 17, 2013.
  - Preliminary Title Report prepared by First American Title Company for 260 Dillon Avenue, dated January 22, 2015.
  - Preliminary Title Report prepared by First American Title Company for 272 Dillon Avenue, dated January February 4, 2015.
  - Home Inspection Report for 260 Dillon Avenue, prepared by Thompson Home Inspection dated December 17, 2012.
  - Robson Homes Geotechnical Investigation 240 Dillon Avenue, Campbell, California. Prepared by Geo-Logic Associates dated February 18, 2015 and follow-up email from geotechnical engineer dated March 5, 2015.
  - Building Survey Report for Suspect Asbestos Containing Material and Lead in Paint, 240, 250, 260 and 272 Dillon Avenue prepared by Sierra Environmental, Inc. dated March 20, 2015.
  - Magnetic Investigation at 260 and 272 Dillon Avenue prepared by JR Associates dated March 9, 2015.
- A review of any information provided by the user of this assessment, including information consistent with Appendix X3 of the ASTM Standard. Pertinent information, if any, is discussed in the appropriate sections of this report.

This assessment was conducted in accordance with ASTM Standard E1527-13, as agreed upon by ENVIRON and Robson Homes in February 2015. Certain “non-scope considerations,” as

defined in the ASTM Standard (i.e., asbestos-containing materials [ACM], radon, lead-based paint, mold) are not directly addressed in this Phase I ESA.

2.3 Significant Assumptions

In conducting this review, no significant assumptions were made, except for the following:

- Site-specific field measurements of groundwater gradient are not available. Groundwater flow directions at nearby sites (available in closure documentation for leaking underground storage tank [LUST] cases posted to the RWQCB Geotracker website) indicated a range of groundwater flow directions in the area, ranging from south-southeast to north-northwest, with a depth to groundwater greater than 50 feet bgs. Based on these measurements, the local topographic gradient (generally to the northeast), and the presence of Los Gatos Creek (flowing to the northeast) located to the southeast of the site, ENVIRON has assumed that the groundwater flow direction beneath the site is approximately to the northeast. In evaluating potential on-site impacts from off-site sources, those off-site facilities not located adjacent to or within one-quarter mile upgradient of the subject site are not considered to represent a significant concern to the subject site. This interpretation is based on the assumption that a hazardous material released to the subsurface generally does not migrate laterally within the unsaturated soil for a significant distance, although a hazardous material can migrate in the groundwater in a generally downgradient direction.

2.4 Reliance and General Limitations

This environmental review has been prepared exclusively without limitation for use by Robson Homes, LLC and affiliated entities including Santa Clara Development Company, Sun Lakes Construction Company of California, and Vesta Real Estate Company Inc., and such other persons or entities whose reliance is explicitly authorized in writing by ENVIRON.

The report is considered current only for a period of 180 days from ENVIRON's most recent site visit which was conducted on March 27, 2015. The conclusions presented in this report represent ENVIRON's best professional judgment based upon the information available and conditions existing as of the date of the review. In performing its assignment, ENVIRON must rely upon publicly available information, information provided by the client, and information provided by third parties. Accordingly, the conclusions in this report are valid only to the extent that the information provided to ENVIRON was accurate and complete.

The scope of work for this assessment did not include an asbestos survey or inspection. According to federal OSHA regulations (29 CFR §1910.1001) and the Model Accreditation Plan (MAP; 40 CFR Part 763, Subpart E, Appendix C), the inspection, testing, evaluation, and/or sampling of suspect asbestos-containing materials must be conducted by an accredited inspector; these activities were not performed as part of this environmental review. Comments in this report regarding the condition of building materials at the site, including presumed or suspect ACM, represent only ENVIRON's observations at the time of the site visit and are not intended to be consistent with definitions regarding ACM condition in the Asbestos Hazard Emergency Response Act (AHERA) or in other federal or state asbestos regulations or industry standards.

Other issues considered outside the scope of the ASTM Standard and this review include radon, lead-based paint, lead in drinking water, wetlands, polychlorinated biphenyls (PCBs) in building materials, cultural and historic resources, ecological resources, endangered species, and high voltage power lines.

3 Site Description

3.1 Site Setting

The properties at 260 and 272 Dillon Avenue comprise an area of approximately 8,000 square-feet in Campbell, Santa Clara County, California (the "site"). According to the Santa Clara County Assessor's Office, the APNs for 260 and 272 Dillon Avenue are 412-08-032 and 412-08-031, respectively. The site is located approximately 0.5 mile southeast of downtown Campbell (Figure 1).

The eastern portion of the 260 Dillon Avenue parcel is developed with a rectangular-shaped, two-story commercial building. The 260 Dillon Avenue building is occupied by a construction company that uses the building for the storage of construction equipment and supplies. The remaining portion of the 260 Dillon Avenue parcel is developed with a concrete parking lot and small covered storage area. The 272 Dillon Avenue parcel is developed with a one-story, single-family residence. Landscaping surrounds the house to the east and west and a small storage shed is located on the eastern portion of the 272 Dillon Avenue parcel. Concrete driveways connect the site to Dillon Avenue along the western site boundary. There are no on-site surface water bodies.

Table A provides an overview of physical setting and utility information for the site.

Table A: Physical Setting and Utility Information

Conditions	Source	Description
Topography		
Elevation (above mean sea level)	USGS topographic map; Google Earth	Ranging from approximately 204 to 206 feet across the site.
Topographic Gradient	USGS topographic map; visual observations	Relatively flat across the site. Regional topography slopes gently downward to the northeast toward San Francisco Bay.
Hydrology		
Surface Water Runoff	Visual observations; site personnel	**260 Dillon Avenue.** Storm water from parking lot and the roof of the building collects in the center of the parking lot where it infiltrates into a storm water catch basin. The storm water catch basin may not be connected to the municipal storm sewer system. Excess storm water flows off-site to the northwest into the street gutter along Dillon Avenue which is connected to the municipal storm sewer system. **272 Dillon Avenue.** Storm water infiltrates into the unpaved areas located to the east and west of the house. Excess storm water flows off-site to the northwest into the street gutter along Dillon Avenue which is connected to the municipal storm sewer system.
Nearest Surface Water Body	USGS topographic map; visual observations	Los Gatos Creek is located approximately 350 feet southeast of site. Los Gatos Creek joins with other creeks in the San Jose area and ultimately drains to San Francisco Bay, located approximately 9.5 miles north-northwest of the site.

Table A: Physical Setting and Utility Information		
Conditions	**Source**	**Description**
Flood Plain	FEMA*; site personnel	Site personnel did not report flooding at the site during significant precipitation events. The site is not located within a 500-year flood zone.
Wetlands	NWI*	There are no federally-designated wetlands on-site. Los Gatos Creek, approximately 350 feet to the southeast of the site, contains federally-designated wetland areas.
Geology and Hydrogeology		
Presumed Direction of Shallow Groundwater Flow	LUST case closure documentation for sites within approximately 0.5 mile of the site, reviewed on RWQCB Geotracker online database	Site-specific field measurements of groundwater gradient are not available. Groundwater flow directions at nearby sites (available in closure documentation for LUST cases posted to the RWQCB Geotracker website) indicate a range of groundwater flow directions in the area, varying from south-southeast to north-northwest. Based on these measurements, the local topographic gradient (generally to the northeast), and the presence of Los Gatos Creek (flowing to the northeast) located approximately 350 feet to the southeast of the site, ENVIRON has assumed that the groundwater flow direction beneath the site is approximately to the northeast.
Depth to Groundwater	2014 geotechnical investigation at nearby site; LUST case closure documentation for sites within approximately 0.5 mile of the site, reviewed on RWQCB Geotracker online database	Boring logs generated during a 2014 geotechnical investigation at the Haig Precision Manufacturing Corporation property, located approximately 350 feet to the northeast of the site, reported that groundwater was not encountered at the depth of boring termination at approximately 45 feet bgs. Groundwater depth data reviewed in LUST case closure documentation for sites within approximately 0.5 mile of the site indicate that the depth to groundwater in the area typically ranges from approximately 70 to 100 feet below ground surface.
On-site Wells	Site personnel; visual observations	There are no on-site monitoring wells.
Nearest Groundwater Supply Wells	EDR database report	18 state-registered wells and 8 federally-registered wells are present within one mile of the site; none are registered as public water supply wells.
Geologic Conditions	Shallow soil sampling conducted at the site; 2014 geotechnical investigation at nearby site; EDR database report	Shallow soil sampling conducted by ENVIRON at the site in March 2015 indicated sandy fill in paved areas up to a depth of approximately 1 foot bgs and clayey silts site-wide to a depth of 3 feet bgs. Boring logs generated during a 2015 geotechnical investigation at the 240 Dillon Avenue location reported clayey sand fill materials from ground surface to approximately 2 feet bgs followed by clayey sand to approximately 10 feet bgs, and sands and gravels to approximately 45 feet bgs (Geo-Logic Associates, 2015). The EDR physical setting report indicates that surface soil types in the area consist of clay loam, silty clay loam, and sandy clay loam, with moderate infiltration rates. Underlying sediments are reported to be quaternary stratified sequences.

Table A: Physical Setting and Utility Information		
Conditions	**Source**	**Description**
Site Utility Information		
Electricity Supplier	Site personnel	Pacific Gas & Electric (PG&E)
Natural Gas Supplier	Site personnel	PG&E
Use of Fuel Oil for Building Heat	Site personnel	No current or former use of fuel oil reported.
Water Supplier	Site personnel	San Jose Water Company
Sanitary Sewer	Site personnel	West Valley Collections
Septic Systems	Site personnel	There are no known current or former septic tanks or leach fields at the site.

Notes:
FEMA = Federal Emergency Management Agency; NCCS = National Cooperative Soil Survey ; NWI = National Wetlands Inventory
* - Source was provided in the EDR database report.

3.2 Current Use of Property

The approximately 8,000 square-feet site is developed with a rectangular-shaped, two-story commercial building on the 260 Dillon Avenue parcel and a one-story, single-family residence on the 272 Dillon Avenue parcel. The remainder of the 260 Dillon Avenue parcel is developed with a concrete parking lot and small covered storage area. Landscaping surrounds the house at 272 Dillon Avenue to the east and west and a small storage shed is located on the eastern portion of the 272 Dillon Avenue parcel (Figure 2). According to site personnel, the 260 Dillon Avenue building was constructed in the late 1970's or early 1980's and the 272 Dillon Avenue building was constructed in approximately 1942.

The 260 Dillon Avenue building is leased by a construction company that uses the building for the storage of construction equipment, including various woodworking machines, and supplies, including paint, drywall materials, and gasoline that are all stored in containers approximately 5 gallon or less in volume. An office used by the construction company is also located inside the 260 Dillon Avenue building. The construction company has occupied the 260 Dillon Avenue building for approximately 2 years.

The 272 Dillon Avenue parcel is owned and occupied by Gabriel and Virginia Young. Mr. and Mrs. Young only use the 272 Dillon Avenue parcel for residential purposes. A small storage shed located on the eastern portion of the 272 Dillon Avenue parcel is reportedly used for household storage.

3.3 Current Uses of Adjoining Properties

The site is located in a mixed commercial/industrial/residential land use area. The nearest residential area is located to the northwest of the site, across Dillon Avenue. Based on discussions with site personnel, ENVIRON's visual observations from the property boundary and public rights-of-way, and a limited review of publicly available information, a general determination of the current use of adjacent properties was developed, as described Table B.

Table B: Current Use of Adjacent Properties

Direction	Property/Land Use	ENVIRON's Observations
North	Undeveloped lot used by landscaping company, located across Dillon Avenue; Edna's Success (a bakery) and commercial space occupied by recording and artist studios located at 240/250 Dillon Avenue.	ENVIRON conducted an ESA of 240 Dillon Avenue for Robson Homes in February 2015. Additional details regarding the findings of ENVIRON's ESA at 240 Dillon Avenue are provided in Section 4.3. No concerns were noted during the 2015 investigation. No apparent exterior manufacturing or chemical storage operations were observed at the landscaping company yard, which is used to park company trucks and store equipment inside sheds. No concerns were noted.
East and south	Undeveloped land parcel (280/282 Dillon Avenue)	ENVIRON conducted an ESA of 280/282 Dillon Avenue and an ESA a small portion of the City of Campbell Corporation Yard at 290 Dillon Avenue for Robson Homes in November 2014. Robson Homes acquired the 280/282 Dillon Avenue property shortly thereafter. The 280/282 Dillon Avenue parcel is currently vacant and recently completed grading activities in preparation for residential development. One small wooden storage shed remains in place on the northernmost portion of the 280/282 Dillon Avenue parcel, and is not currently used. Additional details regarding the findings of ENVIRON's ESA at the 280/282 Dillon Avenue parcel are provided in Section 4.1.2. No apparent exterior manufacturing or chemical storage operations were observed.
West	Commercial building occupied by McLean Electric (265 Dillon Avenue); multi-tenant commercial building, occupants include Mark's Guitar Repair and The Amp Lab (279 Dillon Avenue). Both properties located across Dillon Avenue.	No apparent exterior manufacturing or chemical storage operations were observed at either 265 or 279 Dillon Avenue. No concerns were noted.

Notes:
During the site visit, ENVIRON walked or drove by the borders of these properties that are shared with the subject site. ENVIRON did not enter the neighboring properties with the exception of the 280/282 Dillon Avenue parcels which are owned by Robson Homes and for which ENVIRON conducted an ESA in November 2014, and the property located at 240 Dillon Avenue which ENVIRON investigated for Robson Homes in February 2015.

4 Review of Public Records and Other Information Sources

4.1 Environmental Regulatory Database Review

ENVIRON conducted an ESA for Robson Homes in November 2014 at 290 Dillon Avenue, located approximately 50 feet to the south of the site. As part of this previous ESA, ENVIRON contracted with EDR to prepare a summary of listings in federal and state agency databases within applicable radii of the site as specified by the ASTM standard.[1] Based on the location of 290 Dillon Avenue in close proximity to the site, a September 2014 EDR report for 290 Dillon Avenue was used for the site. A copy of the EDR report is presented in Appendix B.

4.1.1 Database Review for Site

ENVIRON reviewed the results of the state and federal environmental database searches performed by EDR (see Appendix B) and also searched the Geotracker and Envirostor databases. The site was listed on the Historical Substance Storage Container Database (HIST UST), Facility Inventory Database (CA FID UST), and Statewide Environmental Evaluation and Planning System UST Listing (SWEEPS UST) databases. The listings are for an 8,000-gallon gasoline UST historically associated with Draeger Construction Inc./Stinson Construction Inc. at the 260 Dillon Avenue parcel.

Based on documents reviewed by ENVIRON at SCCFD, the UST was actually 5,000 gallons in volume and used to store gasoline. The UST was installed in 1981 and located in the northern portion of the parking lot at the property (see Figure 3). A leak monitoring system was installed in 1986. An Inspection Notice from SCCFD indicates the UST and associated piping and fuel pump were removed on January 22, 1998. The UST was reportedly slightly corroded, though no discolorations or odors were observed in the soil beneath the UST and associated piping and fuel pump. Two soil samples were collected beneath the UST and one soil sample was collected beneath the associated piping. Analytical results of the soil samples did not detect TPH-g, MTBE, or BTEX above laboratory reporting limits. SCCFD issued case closure on February 10, 1998. Based on available information, the former UST located at 260 Dillon Avenue is not considered to be of concern for the site.

ENVIRON collected shallow soil samples in March 2015 in the approximate vicinity of the former piping and fuel pump associated with the former UST. The investigation and analytical results of the soil sampling are discussed in Chapter 6.0.

4.1.2 Database Review for Adjoining Properties

There are several listings in the EDR database report for off-site properties located adjoining to the site. A summary of the pertinent listings is provided below. ENVIRON's analysis of adjoining properties was based on observations made during the site reconnaissance (as discussed in Table B) and location information for off-site listings as presented in the EDR report. The discussion of adjoining sites does not include listings for certain databases that are

[1] EDR uses the term "radii" to refer to the ASTM terminology "approximate minimum search distance" in the environmental database report.

(by themselves) not necessarily indicative of a contamination concern (e.g., compliance listings beyond those specified in Section 8.2.1 of the ASTM Standard). Also, for purposes of this analysis, ENVIRON considers "adjoining" properties to be immediately adjacent, even if separated by a road or other physical barrier.

- **280/282 Dillon Avenue.** 280/282 Dillon Avenue property is an undeveloped parcel adjoining to the east and south of the site. The property is listed on the RWQCB Geotracker online database as "Completed – Case Closed as of November 18, 2014". ENVIRON discovered buried waste materials at the property during excavation of test pits to investigate geophysical anomalies as part of a Phase I ESA and subsurface soil investigation conducted at the property for Robson Homes in 2013. During subsequent trenching and environmental sampling investigations, discolored soil, concrete, ash, metal debris and other waste materials were discovered buried across the central portion of the site. Soil samples collected from within the waste debris and adjacent areas had concentrations of lead, arsenic, total petroleum hydrocarbons (TPH) and PCBs above environmental regulatory screening levels for residential land use. In addition, lead concentrations exceeded California Hazardous Waste Levels and Federal Hazardous Waste Levels in several samples.

  In August 2013, the property was entered into a Voluntary Cleanup Agreement (VCA) under regulatory oversight by SCCDEH. Site Cleanup Goals (SCGs) for specific contaminants of concern (COCs) were established for the property and soil excavation and debris removal was conducted at the property from July to September 2014. Excavated soil was sampled and transported off-site for appropriate landfill disposal. Debris segregated from soil during excavation was also transported off-site for appropriate landfill disposal. Concrete was crushed and stockpiled for reuse. Following excavation, confirmation soil samples were collected from the bases and sidewalls of excavation areas and analyzed for site COCs. Results of confirmation soil sampling indicated that the soil excavation had successfully removed impacted soil and SCGs for site COCs had been achieved. SCCDEH issued a case closure letter approving soil and debris removal activities at the property in a letter dated November 18, 2014.

  The property was previously listed on the Facility and Manifest Data (HAZNET) database, which reported that contaminated soil was removed from the site for disposal after a site cleanup in 1997. The incident contact is listed as EH Canfield and Sons, which is a trucking company out of Eugene, Oregon. According to facility personnel, the cleanup was conducted after the fuel tank of a delivery truck hit the road curb while exiting the site after delivering wooden roofing materials. A fuel spill of less than 20 gallons of fuel resulted from the truck tank contacting the curb. Emergency services were immediately notified and the soil removal was conducted in order to address contaminated soil resulting from the fuel spill.

4.1.3 Database Review for Non-Adjoining Properties

There are several listings in the EDR database report for off-site non-adjoining properties. A summary of the pertinent listings is provided below. As noted in Table A, shallow groundwater beneath the site likely flows to the northeast. Within this section, ENVIRON did not discuss

certain listings for off-site non-adjoining properties that are (by themselves) not necessarily indicative of a contamination concern (e.g., hazardous waste generators, registered storage tanks, compliance listings). Also, ENVIRON did not discuss herein any off-site non-adjoining property that is listed on a database indicative of a contamination concern but for which regulatory closure has been issued, as the issuance of regulatory closure suggests that impacts to the subject site from the noted off-site property are unlikely. Finally, ENVIRON did not discuss herein any off-site non-adjoining property that is presumed to be downgradient or crossgradient of the subject site. This analysis was based on the assumption that a hazardous material released to the subsurface generally does not migrate laterally within the unsaturated soil for a significant distance, but a hazardous material can migrate in the groundwater in a generally downgradient direction; however, the direction of groundwater flow may be affected by localized topographic, hydraulic, and hydrogeologic conditions.

- **City of Campbell Service Center.** The City of Campbell Service Center, also known as the Corporate Yard, is located at 290 Dillon Avenue in Campbell, California, approximately 50 feet to the south of the site. The property is listed on the Hazardous Waste and Substance Site List (HIST CORTESE), Leaking Underground Storage Tank Incident Reports (LUST), Fuel Leak Site Activity Report (HIST LUST), Historical Substance Storage Container Database (HIST UST), CA FID UST, Certified Unified Program Agency (CUPA Listings) database, SWEEPS UST, Recovered Government Archive LUST (RGA LUST), Emissions Inventory Data (EMI), and HAZNET databases. ENVIRON conducted a Phase I ESA and soil investigation on a small portion of the Corporate Yard for Robson Homes in 2014.

  The LUST listings refer to a closed underground fuel leak case. Other UST database listings refer to fuel or waste USTs currently or historically in use at the Corporate Yard. According to SCCFD and one of the environmental databases (SWEEPS UST), five USTs are known to have been installed at the central portion of the 290 Dillon property between 1969 and 1975, including one 10,000-gallon and one 1,000-gallon gasoline UST, a 1,000-gallon diesel UST, and a 250-gallon waste oil UST. A second environmental database pertaining to USTs (HIST UST) indicated that in addition to the USTs listed above, a 200-gallon “waste” UST was also installed at the Corporate Yard in 1970. No confirmation for this UST was found in the available SCCFD records or other sources.

  The 10,000-gallon gasoline UST and the 1,000-gallon diesel UST were removed in 1987 and were the subject of a LUST case. The LUST case was closed in 1999 after soil sampling indicated that any residual impacts to soil appeared to have been naturally attenuated, and groundwater did not appear to have been impacted. According to case closure documentation, the 1,000-gallon diesel UST may have previously been used as a gasoline UST, suggesting that the reported 1,000-gallon gasoline UST could have been the same tank as the 1,000-gallon diesel UST that was removed.

  The 250-gallon waste oil UST and associated underground piping were removed under fire department oversight in 1998 and a closure letter was issued by the fire department. Fuel dispensers and associated underground fuel piping were removed and replaced under fire department oversight in 1999.

No further UST installation or removal documentation was available, and it is not known if either of the other two reported USTs (i.e., the reported 1,000-gallon gasoline UST and the reported 200-gallon "waste" UST) ever existed at the Corporate Yard, and if they did, whether they have been abandoned in place or removed. There is no current LUST case at the Corporate Yard.

The Corporate Yard is currently permitted to operate a double-chambered UST for gasoline and diesel storage, which is equipped with leak monitoring systems and inspected annually, with leak monitoring system testing performed every three years. The Vehicle and Equipment Maintenance Supervisor of the City of Campbell Public Works Maintenance Division indicated that there are no other USTs currently in use at the Corporate Yard.

The CUPA Listings and HIST CORTESE database listings are related to the prior LUST case. The EMI listing indicates that the site holds a permit from the Bay Area Air Quality Management District (BAAQMD) for emission of particulate matter, carbon monoxide, oxides of nitrogen, reactive organic gases, and/or total organic hydrocarbon gases. The listing indicates that permits were issued from 2009 through 2012.

The HAZNET listings are related to hazardous wastes historically generated by the Corporate Yard, which generally have included waste oil, waste hydrocarbon solvent (i.e., benzene), unspecified mixed solvent, off-specification or surplus organic liquids, and unspecified alkaline solutions. There is no indication that any chlorinated solvents were used or disposed from the property.

However, the HAZNET listings also include two disposals of PCBs or materials containing PCBs in 2009. Based on information from facility personnel, the PCB waste disposal events in 2009 were related to the removal of a hydraulic lift from the southern portion of the garage building at the Corporate Yard site. Facility personnel indicated that while the lift was being removed, the hydraulic cylinder was found to be leaking oil into an underground concrete vault. A sample of the oil was removed from the cylinder and analytical testing indicated that the oil contained PCBs. A hazardous materials contractor performed removal of the oil and all oil-containing equipment, and performed cleaning of the underground concrete vault into which the oil had leaked. After completion of cleaning, a rinsate sample was collected and analytical results indicated that PCBs were not detected. The vault was subsequently sealed with concrete, and all of the PCB-containing oil, related equipment, decontamination solutions, and other related wastes potentially contaminated with PCBs were disposed at Evergreen oil recycling facility in Newark, California.

In September and October 2014, ENVIRON conducted a Phase I ESA and limited soil investigation on a portion of the Corporate Yard site. No RECs were identified. The investigation at the Corporate Yard included the collection of soil samples at a depth of approximately 2 feet bgs and the observation of three test pits that were excavated to approximately 9 to 11 feet bgs. Soil samples were also collected from the base of the test pits and from the soil excavated from the test pits. Soil samples were analyzed for metals, TPH, organochlorine pesticides (OCPs), and PCBs. Analytical results of the soil samples

did not report any concentrations that were of concern. Based on available information, the Corporate Yard property is not considered to be of concern for the site.

- **300 Railway Avenue.** The 300 Railway Avenue property is located approximately 300 feet to the southwest of the site. The property is listed on the HIST CORTESE, LUST, HIST LUST, CUPA Listings, RCRA-SQG, FINDS, HAZNET, and EDR US Historical Auto Stations databases for multiple auto repair businesses including Swedish Auto Service, B&J Automotive Repair, Mike's Auto Body, and Stan Nilsson Incorporated. The LUST database indicates that Swedish Auto Service was responsible for a LUST cleanup case. Information obtained from the Geotracker online database indicates that a 500-gallon waste oil UST was removed from the property in March 1987. The tank was noted to have no holes upon removal. The soil underneath the tank was observed to have no petroleum odor or staining. Soil samples collected underneath the tank contained low concentrations of TPH as diesel (TPH-d), oil and grease, and dichlorobenzene. Due to the low concentrations of the contaminants, SCVWD determined that the beneficial uses of groundwater should not be threatened by the residual soil contamination if left in place. The case was granted closure by SCVWD in November 1995. The remaining database listings for the site are consistent with the operation of auto repair businesses and do not necessarily indicate a release at the site. Based on available information, the 300 Railway Avenue property is not considered to be of concern for the site.
- **Son Label, Inc.** The Son Label, Inc. listing is located at 297 Dillon Avenue in Campbell, California, approximately 150 feet to the southwest of the site. The property is listed on the Resource Conservation and Recovery Act (RCRA) Small Quantity Generators (RCRA-SQG) and Facility Index System/Facility Registry System (FINDS) databases. The RCRA-SQG from 1988 indicates the property generated more than 100 and less than 1,000 kilograms (kg) of hazardous waste during any calendar month and accumulated less than 6,000 kg of hazardous waste at any time; or generated 100 kg or less of hazardous waste during any calendar month, and accumulated more than 1000 kg of hazardous waste at any time. Listing indicates no violations found. Based on available information, the Son Label, Inc. property is not considered to be of concern for the site.
- **Railway Distributing, Inc.** The Railway Distributing, Inc. listing is located at 264 Railway Avenue in Campbell, California, approximately 250 feet to the southwest of the site. The property is listed on the CA FID UST, SWEEPS UST, and HIST UST databases for a 1,000-gallon waste tank used for number 6 fuel oil. No LUST case or any documentation was available on the RWQCB Geotracker online database. Based on available information, the Railway Distributing property is not considered to be of concern for the site at this time.
- **Henry Little Tractor Service.** The Henry Little Tractor Service listing is located at 310 Dillon Avenue in Campbell, California, approximately 450 feet to the southwest of the site. The property is listed on the HIST CORTESE, LUST, CUPA Listings, LUST, and HIST LUST databases. The LUST database and review of the Geotracker online database indicate one 4,000-gallon gasoline UST, one 4,000-gallon diesel UST, one 2,000-gallon gasoline UST and associated piping were removed from the property in November 1990. Soil samples collected at a depth of 8 feet bgs below the fill end of the 2,000-gallon

gasoline UST reported concentrations of TPH-d and TPH-g to be 1,100 and 150 parts per million (ppm), respectively. Soil was excavated from the location underneath the fill area of the 2,000-gallon UST. A confirmation sample collected following the excavation at a depth of 12 feet bgs did not report any contaminant concentrations greater than the laboratory reporting limits. Minor concentrations of contaminants (6.6 ppm TPH-d) were reportedly left in place in soil beneath the former location of the 4,000-gallon gasoline UST. SCVWD granted the site case closure in January 1995. Based on available information, the property is not considered to be of concern for the site.

500 Railway Avenue. The 500 Railway Avenue property is located approximately 800 feet to the southwest of the site. The property is listed on the RCRA-SQG, FINDS, LUST, CA FID UST, HIST LUST, SWEEPS UST, HIST UST, and HIST CORTESE database as the Department of Food and Agriculture Pest Detection [sic], Western Gravel, and U-Save Rockery properties. The LUST database and review of the Geotracker online database indicate that nine USTs, ranging in size between 290 and 10,000 gallons, were removed from the site between approximately 1987 and 1992. The tanks were reportedly used to store gasoline, diesel, waste oil, and kerosene. Contaminated soil was observed during the removal of the USTs and soil samples collected underneath the former locations of the USTs reported concentrations of TPH-g, TPH-d, and TPH as motor oil (TPH-mo) to be 1,765, 119, and 15,000 ppm, respectively. Groundwater samples collected from on-site monitoring wells reported minor concentrations (<1 ppm) of TPH-d and BTEX. Approximately 38,000 cubic yards of soil at the property was excavated and approximately 150,000 gallons of groundwater at the property was extracted and treated. Following soil and groundwater remediation, concentrations of TPH-g, TPH-d, and TPH-mo in soil were 39.3, 22, and 26 ppm, respectively, and concentrations of TPH-d and BTEX in groundwater were not detected above laboratory reporting limits. SCVWD granted the site case closure in January 1994. Based on available information, the property is not considered to be of concern for the site.

4.2 Historical Uses of the Site and Adjacent Sites

4.2.1 Past Uses of the Site

The 260 Dillon Avenue parcel was residential with small, likely residential structures, until the current commercial building was constructed in approximately the late 1970's or early 1980's. Various businesses including an automobile repair business, construction company, and painting and drywall company have historically occupied the 260 Dillon Avenue parcel. The 272 Dillon Avenue parcel was likely undeveloped until the current house was constructed in approximately 1942. In addition to residential tenants, the 272 Dillon Avenue parcel was also historically occupied by a painting business and auto wrecking company, although given the small size of the property, the businesses likely only used the property for administrative purposes.

A summary of ENVIRON's key observations from the available historical sources is presented in Table C.

Table C: Summary of Key Observations from Historical Sources for the Subject Site	
Historical Source	**Key Observations Regarding Site History**
Aerial Photographs and Satellite Imagery[1] (1939, 1948, 1950, 1956, 1968, 1974, 1982, 1993, 1998, 2000 – 2014)	Early photographs appear to show small residential structures at the site, although photo quality is poor. The current building at 260 Dillon Avenue is first clearly shown on the 1982 photograph. A structure approximately the same size as the current residence located at 272 Dillon Avenue first appears in the 1948 photograph. No concerns are noted.
Topographic Maps (1899, 1953, 1961, 1968, 1973, 1980)	No development is depicted at the site until 1961, although no individual structures are ever depicted on the maps. No concerns are noted.
City Directory Abstracts (1957, 1963, 1970, 1974, 1975,1980, 1985, 1986, 1991, 1996, 2008, 2013)	**260 Dillon Avenue.** Listings include private residents (1957 and 1963), auto service and repair business and Stinson Construction (1985 and 1986), Promac Painting and Drywall and Pacific Weathershield, a roofing company (2008 and 2013). **272 Dillon Avenue.** Campbell Auto Wreckers (1957), private residents (1963, 1970, 1974, 1975, 1980, 1985, and 1986), and Picasso Painting (1991).
[1] In addition to aerial photographs provided by EDR, ENVIRON viewed historical satellite imagery provided via Google Earth. Printed copies were not obtained, and imagery dates were not independently verified. ENVIRON requested a search of Sanborn maps for the property and vicinity from EDR. The search report indicated that Sanborn maps were available for 1920, 1928, 1935, and 1950. However, the maps do not show the subject site.	

4.2.2 Past Uses of Adjacent Sites

ENVIRON conducted a Phase I ESA for Robson Homes in 2014 for the properties located at 230, 280, and 282 Dillon Avenue, as discussed in Section 4.1.2. The commercial building located at 240/250 Dillon Avenue, located adjacent to the north of the site, has been occupied by various businesses including construction companies, bakeries, and an optical supply company. ENVIRON conducted a Phase I ESA for Robson Homes in 2015 for the 240/250 Dillon Avenue propoerty. As discussed below in Table D, files reviewed at SCCFD as part of the 2015 ESA for the 240/250 Dillon Avenue parcel indicated that a 5,000-gallon UST was removed from the property in 1987. The commercial building located at 265 Dillon Avenue, adjacent to the site across Dillon Avenue and currently occupied by McLean Electric, was formerly occupied by insurance brokers, a roofing company, and a construction company. The commercial building located at 279 Dillon Avenue, adjacent to the site across Dillon Avenue (current occupants include The Amp Lab and Mark's Guitar Repair), was formerly occupied by a woodworking company, a roofing company, a graphic arts company, and machine shops.

4.3 Review of Local and State Agency Information

ENVIRON visited or otherwise contacted local governmental agencies and regulatory bodies for information relating to the site. An overview of the findings of this review is presented in Table D.

Table D: Local Agency Information for the Site	
Agency Contacted / Document Reviewed	**Information Obtained**
Santa Clara County Tax Assessor	Documents reviewed online using the Santa Clara County Tax Assessor's website included assessment roll information and a tax map. The map indicates that the APNs for the site are 412-08-032 and 412-08-031.
City of Campbell Building Division	ENVIRON reviewed available public records maintained in an online database by the City of Campbell Building Division. Online building department records indicate John Draeger was the owner of 260 Dillon Avenue in 2005. ENVIRON also reviewed available records in person at the Building Division office. Records indicate site addresses 260, 260 ½, and 270 ½ were demolished then burned by the Campbell Fire Department in 1966. Permits for electrical, plumbing, and mechanical were obtained by 260 Dillon Avenue owner Art Stinson in 1981.
Santa Clara County Fire Department	ENVIRON reviewed available public records maintained in the SCCFD computer system. Records pertaining to the site, primarily for the 260 Dillon Avenue parcel, were available dating back to the 1960s when the site was residential. Consistent with Building Division records, SCCFD records from 1965 and 1966 indicate structures at addresses 260, 260 ½, and 270 ½ were demolished then burned by the Campbell Fire Department. Records detailing the installation and removal of a 5,000-gallon gasoline UST at 260 Dillon Avenue are discussed in Section 4.1.1. Records also indicate an auto repair business occupied the 260 Dillon Avenue building in approximately 1993. Records indicate the auto repair business stored two 55-gallon waste oil drums, two 55-gallon new engine oil drums, one 16-gallon cleaning solvent drum, one 16-gallon transmission fluid drum, and a solvent tank for parts cleaning in northeast corner of the property building. No violations were noted. Records from 1990 through 1997 indicate the construction companies Prestige Restoration and Draeger Construction were tenants at the site and stored quantities of paint totaling less than 50 gallons and various chemicals including muriatic acid, kerosene, and epoxies in volumes of less than 5 gallons each. No violations were noted.
Santa Clara County Department of Environmental Health (SCCDEH)	ENVIRON requested records from SCCDEH for information regarding soil or groundwater investigations, USTs, LUSTs, hazardous materials inspections, or violations/permits for the property. No response to the request has been received at this time. ENVIRON also searched SCCDEH's online database of LUST, solvent release, and cleanup cases. The database contained no records for the site.
Santa Clara Valley Water District (SCVWD)	ENVIRON requested records from the Santa Clara Valley Water District and was referred to the SCVWD online database of files prior to 2004, at which time local agency oversight was transferred to the Department of Environmental Health. No records related to the site addresses were found on the online database.

4.3.1 Interviews with Site Personnel

ENVIRON conducted personal interviews during the site visit on March 13, 2015 with John Haines, owner of 260 Dillon Avenue since approximately 2013, and Gabriel Young, co-owner of 272 Dillon Avenue since approximately 2010.

Mr. Haines reported that Pacific Weathershield, a roofing company, occupied the 260 Dillon Avenue building from approximately 2005 or 2006 until 2013 when Mr. Haines purchased the

260 Dillon Avenue parcel. The site was vacant for approximately 3 or 4 months until the current construction company moved into the 260 Dillon Avenue building, as discussed in Section 3.2.

According to Mr. Young, the 272 Dillon Avenue house was constructed in approximately 1942 and occupied by workers who were employed by various canneries that were historically located in Campbell. At the time Mr. Young and his wife purchased the 272 Dillon Avenue parcel in 2010, the parcel was used for residential purposes. Mr. Young and his wife currently live in the 272 Dillon Avenue house with their infant child.

4.4 Environmental Lien Record Search

A review of EDR Environmental Lien Search Report dated March 16, 2015 to identify environmental liens or activity use limitations (AULs) imposed by judicial authorities with respect to the property. No environmental liens or AULs were found.

4.5 Previous Environmental Assessments and Activities

Mr. Haines, owner of the 260 Dillon Avenue parcel, reported that a Phase I ESA was conducted for 260 Dillon Avenue in approximately 2013. ENVIRON was unable to obtain a copy of the report for review. As discussed in Section 4.1.1, a 5,000-gallon UST was removed from the site in January 1998. Analytical results of soil samples collected underneath the UST and associated piping did not detect TPH-g, MTBE, or BTEX above laboratory reporting limits. SCCFD issued case closure on February 10, 1998.

4.6 User-Provided Information

ENVIRON provided the client with a User Questionnaire (consistent with Appendix X3 of the ASTM Standard) that requested information relating to environmental liens, AULs, specialized knowledge of the property, property value diminution, chain-of-title, or any other commonly known or obvious indications of site contamination, that was not otherwise provided to ENVIRON. Responses from the User Questionnaire are discussed in the relevant sections of this report.

5 Site Reconnaissance

5.1 Methodology and Limiting Conditions

Jason Kane of ENVIRON conducted a site reconnaissance visit on March 13, 2015. During the site visit, observations of the site were made to evaluate if any RECs, as defined in Chapter 2.0, are present.

5.2 General Site Setting and Observations

ENVIRON made observations during the site visit concerning all of the interior and exterior issues specified in Sections 9.4.2 through 9.4.4 of the ASTM E1527-13 Standard. The presence or absence of each issue of environmental interest or concern is noted in Table E. Only those areas of environmental interest or concern that were observed at the site are discussed further in the text below.

Table E: Summary of Site Reconnaissance Observations

Issue	ASTM Section	Observation
Interior and Exterior Issues		
Current use(s) of the property	9.4.2.1	See Section 3.2
Past use(s) of the property	9.4.2.2	See Section 3.2 and 4.2
Hazardous substances and petroleum products used, treated, stored, disposed of, or generated on the property in connection with identified present or past uses	9.4.2.3	**Historically Present, Currently Present** (see Section 5.2.1)
Storage tanks: Underground storage tanks (fill ports, vent pipes, manholes) Aboveground storage tanks (ASTs)	9.4.2.4	 **Historically Present** Absent (see Section 5.2.2)
Odors (strong, pungent or noxious)	9.4.2.5	Absent
Pools of liquid, standing surface water or sumps	9.4.2.6	Absent
Drums of hazardous substances or petroleum products (for example, five-gallon, 55-gallon or totes)	9.4.2.7	**Historically Present, Currently Present** (see Section 5.2.1)
Hazardous substance and petroleum product containers (not necessarily in connection with identified uses)	9.4.2.8	Absent

Table E: Summary of Site Reconnaissance Observations		
Issue	**ASTM Section**	**Observation**
Unidentified substance containers suspected of containing hazardous substances or petroleum products	9.4.2.9	Absent
Polychlorinated biphenyls (PCBs) Electrical equipment on-site (e.g., transformers, capacitors) Electrical equipment known or likely to contain PCBs Hydraulic equipment on-site (e.g., elevators, truck dock lifts) Hydraulic equipment known or likely to contain PCBs	9.4.2.10	Absent
Interior Issues		
Heating/cooling systems	9.4.3.1	**Present** (see Section 5.2.3)
Stains or corrosion on interior floors, walls or ceilings (except for staining from water)	9.4.3.2	Absent
Floor drains and interior sumps	9.4.3.3	Absent
Exterior Issues		
Pits, ponds or lagoons on property or adjacent sites	9.4.4.1	Absent
Stained soil or pavement	9.4.4.2	Absent
Stressed vegetation (from other than insufficient water)	9.4.4.3	Absent
On-site solid waste disposal; areas apparently filled or graded by non-natural causes; or mounds or depressions suggesting solid waste disposal	9.4.4.4	Absent
Wastewater or other liquid (including storm water) or any discharge into a drain, ditch, underground injection system or stream on or adjacent to the property	9.4.4.5	Absent
Wells (including dry wells, irrigation wells, injection wells, abandoned wells, or other wells)	9.4.4.6	**Present** (see Section 5.2.4)
Septic systems or cesspools	9.4.4.7	Absent
Notes: Observations noted in this table and discussed further below are based on information obtained during the site visits and from a review of the sources summarized in Chapter 4.0. See the ASTM Standard for a detailed description of the issues included in each referenced ASTM section. Per the ASTM Standard, fluorescent light ballasts likely to contain PCBs do not need to be noted.		

5.2.1 Hazardous Substances and Petroleum Products

SCCFD records indicate an auto repair business occupied the 260 Dillon Avenue building in approximately 1993. Records indicate the auto repair business stored two 55-gallon waste oil drums, two 55-gallon new engine oil drums, one 16-gallon cleaning solvent drum, one 16-gallon transmission fluid drum, and a solvent tank for parts cleaning in northeast corner of the property building. No violations were noted. Records from 1990 through 1997 indicate that the

construction companies Prestige Restoration and Draeger Construction were tenants at the 260 Dillon Avenue building and stored quantities of paint totaling less than 50 gallons and various chemicals including muriatic acid, kerosene, and epoxies in volumes of less than 5 gallons each. No violations were noted. A 5,000-gallon gasoline UST was also located in northern portion of the 260 Dillon Avenue parking lot until its removal in 1998, as discussed in Section 4.1.1 and below in Section 5.2.2.

The construction company currently occupying the 260 Dillon Avenue building stores small amounts of construction materials including paint and drywall materials in containers approximately 1 gallon or less in volume as well as gasoline in containers approximately 5 gallons or less in volume. Small amounts of typical household cleaning products are stored in the 272 Dillon Avenue house occupied by Mr. and Mrs. Young.

5.2.2 Underground Storage Tank

According to documents reviewed at SCCFD, a 5,000-gallon gasoline UST formerly located at the site was removed in 1998. Two soil samples were collected beneath the UST and one soil sample was collected beneath the associated piping. Analytical results of the soil samples did not detect TPH-g, MTBE, or BTEX above laboratory reporting limits. SCCFD issued case closure on February 10, 1998. Based on available information, the former UST located at 260 Dillon Avenue is not considered to be of concern for the site.

5.2.3 Heating and Cooling systems

Centrally-provided air conditioning and natural gas-supplied heating is present at the 272 Dillon Avenue household. ENVIRON did not observe air conditioning or heating units at the 260 Dillon Avenue parcel.

5.2.4 Parking Lot Catch Basin

ENVIRON observed a catch basin located in the center of the 260 Dillon Avenue site parking lot. Although Mr. Haines did not have knowledge of the construction of the catch basin, the catch basin appeared to be similar to catch basins observed by ENVIRON at 240 and 290 Dillon Avenue as part of prior Phase I ESAs conducted for Robson Homes. The catch basins observed at 240 and 290 Dillon contain gravel and are not connected to the municipal storm sewer system.

6 Soil Sampling and Analysis

ENVIRON conducted shallow soil sampling at the site on March 10 and 27, 2015. Figure 3 shows the locations of the soil samples and Tables 1 through 3 summarize the results of soil sample analyses.

6.1 Pre-Field Activities

ENVIRON prepared a site-specific health and safety plan (HASP) and notified Underground Service Alert (USA) of the sampling activities at least two working days prior to the start of intrusive sampling, as required by law. ENVIRON contracted with Subdynamic Locating Services, Inc., a private utility locating company located in San Jose, California, to clear proposed boring locations of underground utilities. ENVIRON also contracted with Penecore Drilling of Woodland, California (Penecore) to perform direct-push technology (DPT) drilling activities and with McCampbell Analytical Inc., of Pittsburg, California (MAI) to perform soil analyses.

6.2 Collection of Soil Samples for Chemical Analysis

On March 10, 2015, soil samples were collected for chemical analyses at locations SB06 through SB13 (see Figure 3). Samples were collected with a hand auger from depths of 1.0 or 1.5 feet bgs and observations were recorded to document any indications of staining or other visual evidence of impacts. Soil was screened for VOCs using a calibrated photoionization detector (PID). Soil screened by the PID for VOCs during sampling read less than 1.0 parts per million by volume (ppmv) as isobutylene at all sampling locations. Soil borings SB06 and SB07 were located in the approximate locations of the former piping and fuel pump associated with the former UST on the 260 Dillon Avenue parcel. SB08 and SB09 were located to provide general coverage of the 260 Dillon Avenue parcel during soil sampling. SB10 through SB13 were located adjacent to the 272 Dillon Avenue house to provide general coverage.

All soil samples were collected in laboratory-provided glass jars, labeled, placed in doubled zip-closure bags, and stored on ice in an insulated cooler. Samples were transported to McCampbell Analytical Inc. (MAI) with chain-of-custody documentation for chemical analysis on a five-day turnaround. All soil samples were analyzed for CAM17 metals by US Environmental Protection Agency (EPA) Method 6020, organochlorine pesticides (OCPs) by EPA Method 8081A, and PCBs by EPA Method 8082. Samples SB06 and SB07 were also analyzed for TPH (gasoline, diesel, motor oil ranges) by EPA Method 8015B.

6.3 Soil Analytical Results – Chemical Analyses

With the exception of lead concentrations in samples SB06, SB08, SB11, SB12, and SB13, metal concentrations in soil samples were below Cal-Modified or EPA Regional Screening Levels (RSLs) for residential land use or, in the case of arsenic, consistent with typical naturally-occurring concentrations,. The reported lead concentrations in samples SB06, SB08, SB11, SB12, and SB13 were greater than the residential Cal-Modified RSL of 80 milligram per kilogram (mg/kg) but less than the industrial Cal-Modified RSL of 320 mg/kg. Analytical results for metals are summarized in Table 1. The laboratory analytical report is provided in Appendix D.

Low concentrations of OCPs were present in localized areas across the site. At 272 Dillon in sample SB06, the toxaphene concentration was reported to be 0.51 mg/kg, slightly above the residential RSL of 0.48 mg/kg but below the industrial RSL of 2.1 mg/kg. At 260 Dillon in sample SB11, the chlordane (technical) and heptachlor epoxide concentrations were reported to be 3.6 and 0.068 mg/kg, respectively, above residential RSLs but below industrial RSLs. Sample SB12 had a reported dieldrin concentration of 0.040 mg/kg, slightly above the residential RSL of 0.033 mg/kg but below the industrial RSL of 0.14 mg/kg. Finally, sample SB13 had a reported chlordane (technical) concentration of 2.3 mg/kg, slightly above the residential RSL of 1.8 mg/kg but below the industrial RSL of 8.0 mg/kg. No other OCP concentrations exceeded industrial or residential land use RSLs. Concentrations of total PCBs were not detected above laboratory reporting limits. Analytical results for OCPs are summarized in Table 2. The laboratory analytical report is provided in Appendix D.

Concentrations of TPH-g were not detected above the laboratory reporting limit of 1.0 mg/kg. At 272 Dillon, TPH-d was not detected above the laboratory reporting limit of 1.0 mg/kg in sample SB06 but was reported at a concentration of 29 mg/kg in sample SB07. TPH-mo was reported at concentrations of 9.0 and 810 mg/kg in samples SB06 and SB07, respectively. No reported TPH concentrations exceeded industrial or residential land use RSLs. Analytical results TPH are summarized in Table 3. The laboratory analytical report is provided in Appendix D.

6.4 Step-out Soil Sampling and Analytical Results

On March 27, 2015 step-out soil samples were collected in the vicinity of SB06, SB08, and SB11 through SB13 to delineate elevated lead and/or OCP concentrations. Samples were collected by Penecore, under the direction of ENVIRON, at step-out locations SB14 through SB23 (see Figure 3) from depths ranging between 1.0 and 3.0 feet bgs.

All soil samples were collected in acetate drilling liners or laboratory-provided glass jars, labeled, placed in doubled zip-closure bags, and stored on ice in an insulated cooler. Samples were transported to MAI with chain-of-custody documentation for chemical analysis on a five-day turnaround. Samples collected from 3.0 feet bgs at locations SB11 through SB13 and samples collected from 1.0 foot bgs at locations SB14 through SB17 were analyzed for OCPs by EPA Method 8081A. Samples collected from 3.0 feet bgs at locations SB06, SB08, and SB11 through SB13 as well as samples collected from 1.0 foot bgs at locations SB14 through SB23 were analyzed for lead by EPA Method 6020. All other samples were placed on hold by MAI.

At 272 Dillon, the lead concentration in sample SB14 at a depth of 1.0 foot bgs was reported to be 100 mg/kg, slightly greater than the residential Cal-Modified RSL of 80 mg/kg but less than the industrial Cal-Modified RSL of 320 mg/kg. All other reported lead and OCP concentrations in the step-out samples were less than respective industrial and residential RSLs. The laboratory analytical report is provided in Appendix D.

At 272 Dillon, given their limited extent, the elevated lead and OCP concentrations in shallow soil at the site appear to be localized and are possibly the result of historical lead-based paint use on the structure and historical pesticide use to treat termites.

At 260 Dillon, given their limited extent, the elevated lead concentrations in soil are likely also related to prior use of lead-based paint. The TPH analytical results for samples SB06 and SB07 collected in the vicinity of the former UST piping and fuel pump locations indicate that shallow soil was not impacted by the former UST at 260 Dillon Avenue, consistent with the results of previous soil sampling conducted at the time of the UST removal in 1998.

No further investigation is recommended at this time.

7 Findings, Opinion, and Conclusions

ENVIRON has performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM Practice E1527-13, as well as a shallow soil investigation, at the properties located at 260 and 272 Dillon Avenue in Campbell, California. Any exceptions to, or deletions from, this practice are described in Section 7.3.

7.1 Findings and Opinion

7.1.1 Recognized Environmental Conditions

ENVIRON did not identify any "recognized environmental condition[s]" (REC[s]), as defined by ASTM (see Chapter 2.0), in connection with residential use of the property.

7.1.2 Other Findings

ENVIRON identified the following additional findings that are not considered RECs based on available information:

- **Elevated Lead and OCPs in Localized Area at 272 Dillon**. Although there were three soil sample locations, SB-11, SB-12 and SB-13, where concentrations of lead and OCPs were slightly above RSLs for residential land use, additional sampling and testing showed that these areas are very limited in horizontal and vertical extent and may be related to lead-based paint and historical termite treatment on the adjacent residential building. It is anticipated that as part of site redevelopment, shallow soil in the vicinity of these samples will be stripped and deeper soil mixed as part of site grading activities. Through the stripping and grading process, the lead and OCP concentrations in this area will be decreased significantly and therefore, the lead and OCP in soil does not represent a significant hazard to future site residents.
- **Elevated Lead in Localized Area at 260 Dillon**. Although there were two soil sample locations, SB-06 and SB-08, where concentrations of lead were above RSLs for residential land use, additional sampling and testing showed that these areas are very limited in horizontal and vertical extent and may be related to historical use of lead-based paint. It is anticipated that as part of site redevelopment, shallow soil in the vicinity of these samples will be stripped and deeper soil mixed as part of site grading activities. Through the stripping and grading process, the lead concentrations in this area will be decreased significantly and therefore, the lead in soil does not represent a significant hazard to future site residents.
- **Underground Storage Tank Removal at the Site.** ENVIRON reviewed historical documents relating to the removal of a 5,000-gallon gasoline UST at the 260 Dillon Avenue parcel. The UST was installed in 1981 and located in the northern portion of the 260 Dillon Avenue parking lot. A leak monitoring system was installed in 1986. An Inspection Notice from SCCFD indicates the UST and associated piping and fuel pump was removed on January 22, 1998. The UST was reportedly slightly corroded, though no discolorations or odors were observed in the soil beneath the UST and associated piping and fuel pump. Two soil samples were collected beneath the UST and one soil sample was collected beneath the associated piping. Analytical results of the soil samples did not detect TPH-g,

MTBE, or BTEX above laboratory reporting limits. SCCFD issued case closure on February 10, 1998. Based on available information, the former UST located at 260 Dillon Avenue is not considered to be of concern for the site.

7.1.3 De Minimis Conditions

De minimis conditions are those that do not represent a material risk of harm to public health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies. ENVIRON did not identify any *de minimis* conditions during the course of this assessment.

7.2 Conclusions

ENVIRON has performed this Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM Practice E 1527-13, of the properties located at 260 and 272 Dillon Avenue in Campbell, California. Any exceptions to, or deletions from, this practice are described in Section 7.3 of this report. This assessment has revealed evidence of no recognized environmental conditions at the site. No further investigation is recommended at this time.

7.3 Analysis of Data Gaps

The ASTM Standard defines a data gap as “a lack of or inability to obtain information required by the practice despite good faith efforts by the environmental professional to gather such information.” A data gap is only significant if other information obtained during the ESA, or professional experience, raises reasonable concerns and affects the ability of the environmental professional to identify whether a given issue is a REC. The ASTM Standard requires that the ESA report identify and comment on significant data gaps. Limiting conditions and deviations to the ASTM Standard for the assessment are discussed below.

- ENVIRON was unable to observe a small shed located in the backyard of the 272 Dillon Avenue parcel. The shed is reportedly used for household storage and is unlikely to be of concern for the site.

None of the exceptions, deletions, deviations, or site reconnaissance limitations noted above are considered to represent significant data gaps.

8 References

8.1 Documents

Civil Engineering Associates (CEA). 2013. *ALTA/ACSM Land Title Survey, 280 Dillon Avenue*. April 17.

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Sierra Environmental, Inc. 2015. *Building Survey Report for Suspect Asbestos-Containing Material and Lead in Paint 240, 250, 260 and 272 Dillon Avenue, Campbell, Ca*. March 20.

Thompson Home Inspection, Inc. 2012. Home Inspection Report for 260 Dillon Avenue, Campbell, Ca. December 17.

8.2 Interviews

John Haines. Owner of 260 Dillon Avenue. 2015. Personal interview. March 13.

Gabriel Young. Owner of 272 Dillon Avenue. 2015. Personal interview. March 13.

Tables

Table 1: Metals in Soil Samples
Results of Soil Sampling
260 and 272 Dillon Avenue, Campbell, California

Sample ID	Sample Depth (feet bgs)	Sample Date	Antimony	Arsenic*	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
260 Dillon Ave																			
SB06_1.5	1.5	3/10/2015	**1.2**	**7.0**	**320**	**0.57**	**0.69**	**53**	**13**	**38**	**210**	**0.083**	**1.1**	**73**	ND<0.50	ND<0.50	ND<0.50	**46**	**350**
SB06_3.0	3.0	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**15**	NA	NA	NA	NA	NA	NA	NA	NA
SB07_1.5	1.5	3/10/2015	**0.51**	**6.1**	**260**	ND<0.50	**0.36**	**120**	**21**	**37**	**20**	**0.27**	**0.95**	**260**	ND<0.50	ND<0.50	ND<0.50	**71**	**77**
SB08_1.5	1.5	3/10/2015	**2.3**	**8.7**	**300**	**0.63**	**1.3**	**64**	**16**	**56**	**250**	**0.18**	**1.1**	**84**	ND<0.50	**0.52**	ND<0.50	**50**	**470**
SB08_3.0	3.0	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**9.9**	NA	NA	NA	NA	NA	NA	NA	NA
SB09_1.5	1.5	3/10/2015	**0.73**	**9.0**	**240**	**0.90**	**0.34**	**76**	**18**	**45**	**14**	**0.072**	**1.7**	**110**	**0.88**	ND<0.50	ND<0.50	**65**	**100**
SB18_1.5	1.5	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**53**	NA	NA	NA	NA	NA	NA	NA	NA
SB19_1.5	1.5	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**69**	NA	NA	NA	NA	NA	NA	NA	NA
SB20_1.5	1.5	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**10**	NA	NA	NA	NA	NA	NA	NA	NA
SB21_1.5	1.5	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**50**	NA	NA	NA	NA	NA	NA	NA	NA
SB22_1.5	1.5	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**45**	NA	NA	NA	NA	NA	NA	NA	NA
SB23_1.5	1.5	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**40**	NA	NA	NA	NA	NA	NA	NA	NA
272 Dillon Ave																			
SB10_1.5	1.5	3/10/2015	**0.56**	**7.4**	**210**	**0.82**	**0.32**	**60**	**15**	**34**	**18**	**0.084**	**1.3**	**84**	**0.53**	ND<0.50	ND<0.50	**52**	**97**
SB11_1.0	1.0	3/10/2015	**3.4**	**4.9**	**1,000**	ND<0.50	**1.1**	**63**	**17**	**46**	**96**	**0.69**	**1.0**	**83**	**0.69**	ND<0.50	ND<0.50	**62**	**420**
SB11_3.0	3.0	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**11**	NA	NA	NA	NA	NA	NA	NA	NA
SB12_1.0	1.0	3/10/2015	**1.9**	**8.5**	**290**	**0.82**	**1.2**	**69**	**15**	**55**	**140**	**0.19**	**1.4**	**86**	**0.51**	ND<0.50	ND<0.50	**57**	**300**
SB12_3.0	3.0	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**7.4**	NA	NA	NA	NA	NA	NA	NA	NA
SB13_1.0	1.0	3/10/2015	**1.3**	**6.3**	**210**	ND<1.0	**0.94**	**49**	**12**	**39**	**110**	**0.19**	**0.88**	**61**	ND<0.50	ND<0.50	ND<0.50	**45**	**330**
SB13_3.0	3.0	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**8.4**	NA	NA	NA	NA	NA	NA	NA	NA
SB14_1.0	1.0	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**100**	NA	NA	NA	NA	NA	NA	NA	NA
SB15_1.0	1.0	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**22**	NA	NA	NA	NA	NA	NA	NA	NA
SB16_1.0	1.0	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**50**	NA	NA	NA	NA	NA	NA	NA	NA
SB17_1.0	1.0	3/27/2015	NA	NA	NA	NA	NA	NA	NA	NA	**24**	NA	NA	NA	NA	NA	NA	NA	NA
Industrial/Commercial RSL			470	3.0	220,000	180[1]	6.4[1]	1,800,000[2]	350	47,000	320[1]	40	5,800	22,000	5,800	5,800	12	5,800	350,000
Residential RSL			31	0.67	15,000	15[1]	4.6[1]	120,000[2]	23	3,100	80[1]	9.4	390	1,500	390	390	0.78	390	23,000

Notes:
Detected compounds are shown in **bold**.
All data are reported in milligrams per kilogram (mg/kg), unless noted otherwise
*Arsenic is naturally-occurring in soil at concentrations up to 20 mg/kg.
Blue shading denotes detection above regulatory screening criteria or typical background concentration.
Green shading indicates data from most recent sampling event on March 27, 2015.

California Assessment Manual 17 (CAM17) metals analyzed by EPA Method 6020

[1] DTSC HHRA Note 3 value. July 14, 2014
[2] RSLs reported for chromium(III), insoluble salts
bgs = below ground surface
DTSC = Department of Toxic Substances Control
HHRA = Human Health Risk Assessment
ND = not detected at or above the laboratory reporting limit shown
RSL = regional screening level
Source : USEPA Screening Levels for Chemical Contaminants, January 2015 update. Regional Screening Level (RSL) Summary Table (TR=1E-6, HQ=1).
STLC Source: California Code of Regulations, Title 22, Chapter 11, Article 3
TCLP Source: 40 CFR 261, appendix II, 1993 ed., as amended by 58 FR 46040, Aug 31, 1993

Table 2: Organochlorine Pesticides Detected in Soil Samples
Results of Soil Sampling
260 and 272 Dillon Avenue, Campbell, California

Sample ID	Sample Depth (feet bgs)	Sample Date	Chlordane (Technical)	a-Chlordane	g-Chlordane	p,p-DDD	p,p-DDE	p,p-DDT	Dieldrin	Heptachlor Epoxide	Toxaphene
260 Dillon Ave											
SB06_1.5	1.5	3/10/2015	ND<0.050	**0.0039**	**0.0041**	ND<0.0020	**0.0073**	**0.013**	ND<0.0020	ND<0.0020	**0.51**
SB07_1.5	1.5	3/10/2015	ND<5.0	ND<0.20	ND<0.20	ND<0.20	ND<0.20	ND<0.20	ND<0.20	ND<0.20	ND<10
SB08_1.5	1.5	3/10/2015	**0.28**	**0.030**	**0.029**	ND<0.0050	**0.043**	**0.068**	**0.010**	ND<0.0050	ND<0.25
SB09_1.5	1.5	3/10/2015	ND<0.025	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.050
272 Dillon Ave											
SB10_1.5	1.5	3/10/2015	**0.11**	**0.012**	**0.0046**	ND<0.0010	**0.0011**	**0.0035**	**0.0018**	**0.0016**	ND<0.050
SB11_1.0	1.0	3/10/2015	**3.6**	**0.39**	**0.35**	**0.082**	**0.72**	**0.99**	ND<0.010	**0.068**	ND<0.50
SB11_3.0	3.0	3/27/2015	**0.058**	**0.0063**	**0.0046**	**0.0081**	**0.034**	**0.022**	ND<0.0010	**0.0013**	ND<0.050
SB12_1.0	1.0	3/10/2015	**0.68**	**0.076**	**0.063**	ND<0.020	**0.032**	**0.21**	**0.040**	ND<0.020	ND<1.0
SB12_3.0	3.0	3/27/2015	ND<0.025	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.050
SB13_1.0	1.0	3/10/2015	**2.3**	**0.25**	**0.20**	**0.035**	**0.34**	**0.25**	ND<0.010	**0.019**	ND<0.50
SB13_3.0	3.0	3/27/2015	ND<0.025	**0.0012**	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.0010	ND<0.050
SB14_1.0	1.0	3/27/2015	**0.029**	**0.0024**	**0.0023**	**0.0037**	**0.034**	**0.043**	ND<0.0010	**0.0010**	ND<0.050
SB15_1.0	1.0	3/27/2015	ND<0.025	**0.0020**	**0.0011**	**0.0016**	**0.0063**	**0.010**	**0.0037**	ND<0.0010	ND<0.050
SB16_1.0	1.0	3/27/2015	**0.036**	**0.0039**	**0.0017**	**0.0014**	**0.0095**	**0.0081**	ND<0.0010	ND<0.0010	ND<0.050
SB17_1.0	1.0	3/27/2015	ND<0.025	**0.0014**	ND<0.0010	ND<0.0010	**0.0021**	**0.0020**	ND<0.0010	ND<0.0010	ND<0.050
Industrial/Commercial RSL			8.0	8.0	8.0	9.6	6.8	8.6	0.14	0.25	2.1
Residential RSL			1.8	1.8	1.8	2.2	1.6	1.9	0.033	0.059	0.48

Notes:
*Analysis for PCBs reported no concentrations above analytical reporting limits.

Only compounds detected above the laboratory reporting limit are included in the table.
Detected compounds are shown in **bold**.
All data are reported in milligrams per kilogram (mg/kg).
Blue shading denotes detection above regulatory screening criteria or typical background concentration.
Green shading indicates data from most recent sampling event on March 27, 2015.

Organochlorine pesticides (OCPs) analyzed by EPA Method 8081A
Polychlorinated biphenyls (PCBs) analyzed by EPA Method 8082

bgs = below ground surface
DDE = dichlorodiphenylethylene
DDT = dichlorodiphenyltrichloroethane
EPA = Environmental Protection Agency
ND = not detected at or above the laboratory reporting limit shown
PCB = polychlorinated biphenyls
RSL = regional screening level
Source : USEPA Screening Levels for Chemical Contaminants, January 2015 update. Regional Screening Level (RSL) Summary Table (TR=1E-6, HQ=1).

Table 3: Total Petroleum Hydrocarbons in Soil Samples
Results of Soil Sampling
260 Dillon Avenue, Campbell, California

Sample ID	Sample Depth (feet bgs)	Sample Date	TPH-G	TPH-D	TPH-MO
260 Dillon Ave					
SB06_1.5	1.5	3/10/2015	ND<1.0	ND<1.0	**9.0**
SB07_1.5	1.5	3/10/2015	ND<1.0	**29**	**810**
Commercial/Industrial RSL			420	440	33,000
Residential RSL			82	96	2,500

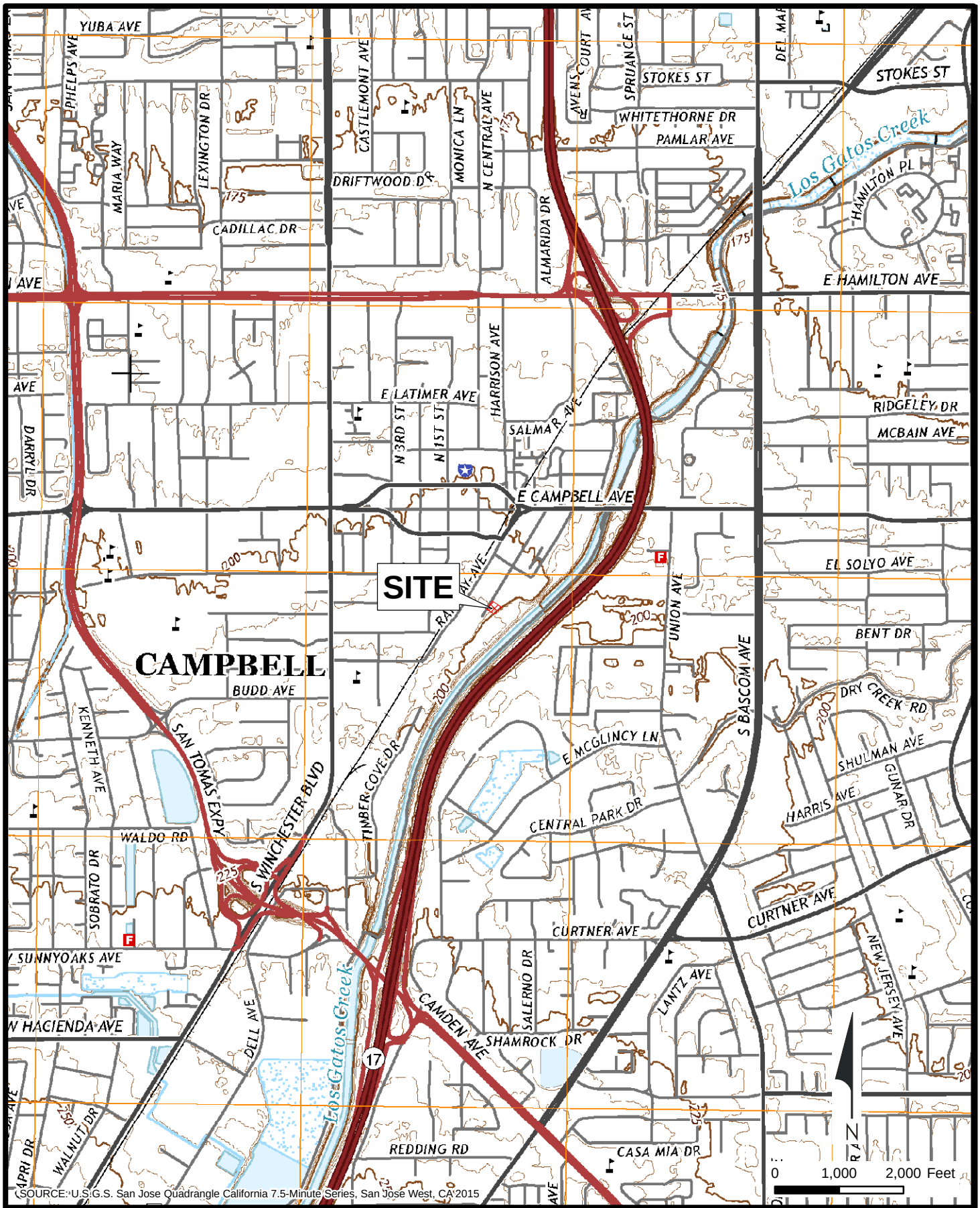
Notes:
Detected compounds are shown in **bold**.
All data are reported in milligrams per kilogram (mg/kg).

Total Petroleum Hydrocarbons analyzed by EPA Method 8015B

bgs = below ground surface
EPA = Environmental Protection Agency

RSL = regional screening level
Source : USEPA Screening Levels for Chemical Contaminants, January 2015 update. Regional Screening Level (RSL) Summary Table (TR=1E-6, HQ=1).
ND = not detected at or above the laboratory reporting limit shown
TPH-G = Total Petroleum Hydrocarbons as Gasoline (C6-C12)
TPH-D = Total Petroleum Hydrocarbons as Diesel (C10-C23)
TPH-MO = Total Petroleum Hydrocarbons as Motor Oil (C18-C36)

Figures



(SOURCE: U.S.G.S. San Jose Quadrangle California 7.5-Minute Series, San Jose West, CA 2015

ENVIRON

Site Location Map
260 and 272 Dillon Avenue
Campbell, California

Figure
1

Drafter:	RS	Date: 4/7/2015	Contract Number:	03-21676AA	Approved:	Revised:

Path: Q:\DRAWINGS\0321676AA\0321676AA-campbell-locmap.mxd

ENVIRON

Site Layout
260 and 272 Dillon Avenue
Campbell, California

Figure
2

Drafter: RS | Date: 4/7/2015 | Contract Number: 03-21676AA | Approved: | Revised:

Path: Q:\DRAWINGS\0321676AA\0321676AA-campbell-layout.mxd

ENVIRON

Sampling Location Map
260 and 272 Dillon Avenue
Campbell, California

Figure
3

Drafter: RS | Date: 4/17/2015 | Contract Number: 03-21676Z | Approved: | Revised:

Path: Q:\DRAWINGS\0321676AA\0321676AA-campbell-samploc.mxd



Phase I Environmental Site Assessment and Subsurface Investigation

240 and 250 Dillon Avenue
APN 412-08-033
Campbell, CA

Prepared for:

Robson Homes, LLC
San Jose, CA

Prepared by:
Ramboll Environ US Corportation
Emeryville, CA

Date:
May 14, 2015

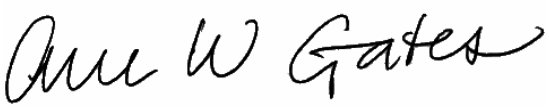
Project Number:
03-21676Z

RAMBOLL ENVIRON

Signature and Environmental Professional Statement

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR §312.10.

Further, I have the specific qualifications based on education, training, and experience to assess a property of the nature, history and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Anne W. Gates, P.E.

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Emeryville, CA

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Appendices

1 Summary of Conclusions

Ramboll Environ US Corporation (Environ) was retained by Robson Homes, LLC ("Robson Homes") to perform a Phase I Environmental Site Assessment (ESA) and subsurface soil investigation of the property located at 240 and 250 Dillon Avenue in Campbell, California (herein referred to as the "site" or "property"). Environ's assessment was conducted in connection with the purchase of the property. The ESA described in this report was performed in general conformance with the scope and limitations of the ASTM International's *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* E-1527-13 (the "ASTM Standard"), as stated in Chapter 2.0 (Introduction). Any exceptions to, or deletions from, this practice are described in Section 8.3 of this report.

1.1 Recognized Environmental Conditions

Environ did not identify any "recognized environmental condition[s]" (REC[s]), as defined by ASTM (see Chapter 2.0), in connection with residential use of the property. No further investigation of the site is warranted at this time.

1.2 Other Findings

Although not considered RECs based on currently available information, Environ identified the following other findings:

- **Underground Storage Tank Removal at the Site.** Environ reviewed historical documents relating to the removal of a 5,000-gallon gasoline underground storage tank (UST) at the site. The UST was reportedly installed by a concrete contracting business in approximately 1974 when the site building was constructed. The UST, which was removed in 1987, was formerly located on the southern portion of the site and used to store fuel for company vehicles. Documents provided by the site owner and reviewed at Santa Clara County Fire Department (SCCFD) indicate the UST was removed on December 22, 1987. Two soil samples were collected 2 feet beneath the base of the UST at a depth of 16 feet below ground surface (bgs). Analytical results of the soil samples did not detect total petroleum hydrocarbons as gasoline (TPH-G) or benzene, toluene, ethylbenzene, or xylenes (BTEX) above laboratory reporting limits. During Environ's subsurface investigation in January 2015, soil and soil gas samples collected at and in the vicinity of the former UST location also did not show evidence of a release from the UST. Specifically, results of the soil sample collected beneath the location of the former UST did not report TPH fractions of gasoline, diesel, or motor oil greater than respective laboratory reporting limits.

- **Naturally-Occurring Asbestos in Aggregate Base.** Sample analytical results for naturally-occurring asbestos (NOA) in one three-point composite sample collected from aggregate base rock beneath the concrete-paved parking lot at the site reported the asbestos type chrysotile was present in the sample at a concentration of 0.50%. Since this one sample is above 0.25%, the level at which compliance with Bay Area Air Quality Management District (BAAQMD) guidelines are triggered, an asbestos dust mitigation

plan may need to be implemented if the aggregate base rock layer is disturbed during construction.

De minimis conditions, as defined in Chapter 2.0, along with other site conditions observed during the site visits, are discussed within relevant sections of this report and are summarized in Chapter 8.0.

2 Introduction

2.1 Purpose

Environ was retained by Robson Homes to conduct a Phase I ESA and subsurface soil investigation of the property located at 240 and 250 Dillon Avenue (APN 412-08-033) in Campbell, California. Environ's assessment was conducted in connection with the purchase of the property. The purpose of the assessment was to identify RECs, which are defined in the ASTM Standard as:

> "The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not recognized environmental conditions."

2.2 Scope of the Phase I ESA

Environ completed the following tasks, consistent with the ASTM Standard, during its Phase I ESA of the property:

- Visits to the site by Jason Kane of Environ on January 16 and January 20, 2015 to observe the features of the site and to identify the uses and conditions specified in the ASTM Standard. During the site visits, Environ observed the adjoining properties from the site or adjacent public thoroughfares. Photographs taken during the site visits are presented in Appendix A.
- A telephone interview on January 15, 2015 with Bob Stedman, who owns the site through Jildar, Inc.,and has been owner of site since approximately 1976. Mr. Stedman is herein referred to as the "site owner". An interview was also conducted during the site visit on January 20, 2015 with David Posey, co-owner of Edna's Success, who has operated Edna's Success at the site since approximately 2008. Mr. Posey is herein referred to as "site personnel." The site owner and site personnel interviewed by Environ were identified as having good knowledge of the current and historical uses and physical characteristics of the site.
- A review of information contained in federal and state environmental databases, as obtained from the sources noted below:
  - A radius report prepared by Environmental Data Resources, Inc. (EDR) on May 14, 2015 for the site and off-site properties in the vicinity of the site.). A copy of the EDR radius report is included as Appendix B. The databases and the radius searched for each database were selected in accordance with the ASTM Standard and are identified in the EDR database report. The dates of the most recent updates of the environmental databases are also listed in the database report.
  - The United States Environmental Protection Agency's (USEPA's) Envirofacts database, which provides site information contained in multiple USEPA regulatory databases.

- The USEPA's Enforcement and Compliance History Online (ECHO) database, which provides information on sites' enforcement and compliance history.
- The State of California's Regional Water Quality Control Board (RWQCB) Geotracker online database and the California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC) Envirostor online database.

- A review of the EDR Environmental Lien Search Report dated January 30, 2015 and the First American Title Company Preliminary Title Report dated May 12, 2015 to identify environmental liens or activity use limitations (AULs) imposed by judicial authorities with respect to the property.
- A review of standard historical sources (included as Appendix C) and local agency inquiries, as defined in the ASTM Standard. The following resources were reviewed:
  - Readily available historical sources, including (where available) historical topographic maps and aerial photographs, city directories, and Sanborn Maps, to develop a history of the previous uses of the site and surrounding area.
  - Historical and site-specific information obtained from the following local agencies: Santa Clara County Assessor's Office (Assessor), Santa Clara County Fire Department (SCCFD), and the City of Campbell Building Division (Building Division). Environ also requested files from the Santa Clara County Environmental Health Department (SCCDEH) and the Santa Clara Valley Water District (SCVWD).
  - Telephone interview with a representative of the SCCFD regarding historical records available for the site. Environ was informed that records were found for the property and could be provided through a file review, which Environ performed.
  - A review of microfiche files was performed by Environ on January 20, 2015 at the Building Division office. Environ also performed an online review of additional Building Division records.
- A review of physical setting sources, as defined in the ASTM Standard, including:
  - The current USGS 7.5-minute topographic map that shows the area on which the site is located.
  - Geologic, hydrogeologic, or hydrologic sources as provided in the EDR report.
- A review of documents provided to Environ by the site owner related to the removal of a 5,000-gallon UST formerly located in site parking lot.
- Information gathered as part of the following ESAs conducted by Environ for Robson Homes at properties adjacent to and in the vicinity of the site:
  - *Phase I Environmental Site Assessment, 230, 280, and 282 Dillon Avenue, Campbell, California, November 24, 2014.* 230, 280, and 282 Dillon Avenue are located adjacent to the north and east of the site.

  - *Phase I Environmental Site Assessment and Soil Investigation, Portion of 290 Dillon Avenue, Campbell, California, November 25, 2014.* 290 Dillon Avenue is located approximately 150 feet to the south of the site.
  - *Phase I Environmental Site Assessment and Subsurface Soil Investigation, 190 Dillon Avenue, Campbell, California, June 2014.* 190 Dillon Avenue is located approximately 200 feet to the southeast of the site.
  - *Phase I Environmental Site Assessment and Subsurface Soil Investigation, Haig Precision Manufacturing Corporation, 186 Gilman Avenue, 186 Dillon Avenue, and 426 Sam Cava Lane, Campbell, California,* January 2015. The Haig properties are located approximately 250 feet to the northeast of the site.
  - *Phase I Environmental Site Assessment and Subsurface Soil Investigation, 466, 472, 482, 488, Sam Cava Lane, Campbell, California, May 23, 2014.* The Sam Cava Lane properties are located approximately 350 feet to the northeast of the site.
- A review of the geophysical survey report for the site titled *Magnetic Investigation at 240 Dillon Avenue in Campbell, California*, prepared by JR Associates, January 13, 2015.
- A review of the draft geotechnical report for the site titled *Geotechnical Investigation, 240 Dillon Avenue, Campbell, California,* prepared by Geo-Logic Associates, February 18, 2015.
- A review of the *Building Survey Report for Suspect Asbestos-Containing Material and Lead in Paint, 240, 250, 260, 272 Dillon Avenue, Campbell, California,* prepared by Sierra Environmental, Inc., March 20, 2015.
- A review of the *ALTA/ASCM Land Title Survey and Topographic Map*, prepared by Civil Engineering Associates (CEA), dated April 17, 2013.
- Visits to the site January 16 and 20, 2015 for collection of environmental samples.
- A review of any information provided by the user of this assessment, including information consistent with Appendix X3 of the ASTM Standard. Pertinent information, if any, is discussed in the appropriate sections of this report.

This assessment was conducted in accordance with ASTM Standard E1527-13, as agreed upon by Environ and Robson Homes in January 2015. Certain “non-scope considerations,” as defined in the ASTM Standard (i.e., asbestos-containing materials [ACM], radon, lead-based paint, mold) are not directly addressed in this Phase I ESA.

2.3 Significant Assumptions

In conducting this review, no significant assumptions were made, except for the following:

- Site-specific field measurements of groundwater gradient are not available. Groundwater flow directions at nearby sites (available in closure documentation for leaking underground storage tank [LUST] cases posted to the RWQCB Geotracker website) indicated a range of groundwater flow directions in the area, ranging from south-southeast to north-northwest, with a depth to groundwater greater than 50 feet bgs. Based on these measurements, the

local topographic gradient (generally to the northeast), and the presence of Los Gatos Creek (flowing to the northeast) located to the southeast of the site, Environ has assumed that the groundwater flow direction beneath the site is approximately to the northeast. In evaluating potential on-site impacts from off-site sources, those off-site facilities not located adjacent to or within one-quarter mile upgradient of the subject site are not considered to represent a significant concern to the subject site. This interpretation is based on the assumption that a hazardous material released to the subsurface generally does not migrate laterally within the unsaturated soil for a significant distance, although a hazardous material can migrate in the groundwater in a generally downgradient direction.

2.4 Reliance and General Limitations

This environmental review has been prepared exclusively without limitation for use by Robson Homes, LLC and affiliated entities including Santa Clara Development Company, Sun Lakes Construction Company of California, and Vesta Real Estate Company Inc., and such other persons or entities whose reliance is explicitly authorized in writing by Environ.

The report is considered current only for a period of 180 days from Environ's most recent site visit which was conducted on January 20, 2015. The conclusions presented in this report represent Environ's best professional judgment based upon the information available and conditions existing as of the date of the review. In performing its assignment, Environ must rely upon publicly available information, information provided by the client, and information provided by third parties. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Environ was accurate and complete. This review is not intended as legal advice, nor is it an exhaustive review of site conditions or facility compliance.

The scope of work for this assessment did not include an asbestos survey or inspection. According to federal OSHA regulations (29 CFR §1910.1001) and the Model Accreditation Plan (MAP; 40 CFR Part 763, Subpart E, Appendix C), the inspection, testing, evaluation, and/or sampling of suspect asbestos-containing materials must be conducted by an accredited inspector; these activities were not performed as part of this environmental review. Comments in this report regarding the condition of building materials at the site, including presumed or suspect ACM, represent only Environ's observations at the time of the site visit and are not intended to be consistent with definitions regarding ACM condition in the Asbestos Hazard Emergency Response Act (AHERA) or in other federal or state asbestos regulations or industry standards.

Other issues considered outside the scope of the ASTM Standard and this review include radon, lead-based paint, lead in drinking water, wetlands, PCBs in building materials, cultural and historic resources, ecological resources, endangered species, and high voltage power lines.

3 Site Description

3.1 Site Setting

The approximately 0.25-acre property is located in Campbell, Santa Clara County, California (the "site" or "property"). According to the Santa Clara County Assessor's Office, the APN for the site is 412-08-033. The site is located approximately 0.5 mile southeast of downtown Campbell (Figure 1).

The site is developed with an "L"-shaped, one-story commercial building. The northern portion of the site building (240 Dillon Avenue) is occupied by Edna's Success, a bakery (herein referred to as "the bakery"). The southern portion of the site building (250 Dillon Avenue) is occupied by two recording studios and two artist studios. The remainder of the site is a concrete-paved parking lot. A concrete driveway connects the site to Dillon Avenue along the northwestern site boundary. There are no on-site surface water bodies.

Table A provides an overview of physical setting and utility information for the site.

Table A: Physical Setting and Utility Information

Conditions	Source	Description
Topography		
Elevation (above mean sea level)	USGS topographic map; Google Earth	Ranging from approximately 204 to 205 feet across the site.
Topographic Gradient	USGS topographic map; visual observations	Relatively flat across the site. Regional topography slopes gently downward to the northeast toward San Francisco Bay.
Hydrology		
Surface Water Runoff	Visual observations; site personnel	Storm water from parking lot and the roof of the site building collects in the center of the parking lot where it infiltrates into a storm water catch basin. The storm water catch basin is not connected to the municipal storm sewer system. Excess storm water flows off-site to the northwest into the street gutter along Dillon Avenue which is connected to the municipal storm sewer system.
Nearest Surface Water Body	USGS topographic map; visual observations	Los Gatos Creek is located approximately 350 feet southeast of site. Los Gatos Creek joins with other creeks in the San Jose area and ultimately drains to San Francisco Bay, located approximately 9.5 miles north-northwest of the site.
Flood Plain	FEMA*; site personnel; site owner	Site personnel reported flooding in the parking lot of the site during significant precipitation events. The flooding is reportedly due to clogging of the storm water catch basin and does not impact the interior of the site building. The site is not located within a 500-year flood zone.
Wetlands	NWI*	There are no federally-designated wetlands on-site. Los Gatos Creek, approximately 350 feet to the southeast of the site, contains federally-designated wetland areas.

Table A: Physical Setting and Utility Information		
Conditions	**Source**	**Description**
Geology and Hydrogeology		
Presumed Direction of Shallow Groundwater Flow	LUST case closure documentation for sites within approximately 0.5 mile of the site, reviewed on RWQCB Geotracker online database	Site-specific field measurements of groundwater gradient are not available. Groundwater flow directions at nearby sites (available in closure documentation for LUST cases posted to the RWQCB Geotracker website) indicate a range of groundwater flow directions in the area, varying from south-southeast to north-northwest. Based on these measurements, the local topographic gradient (generally to the northeast), and the presence of Los Gatos Creek (flowing to the northeast) located approximately 350 feet to the southeast of the site, Environ has assumed that the groundwater flow direction beneath the site is approximately to the northeast.
Depth to Groundwater	2015 geotechnical investigation at the site; 2014 geotechnical investigation at nearby site; LUST case closure documentation for sites within approximately 0.5 mile of the site, reviewed on RWQCB Geotracker online database	Boring logs generated during a 2015 geotechnical investigation at the site reported that groundwater was not encountered at the depth of boring termination at approximately 20 feet bgs. Boring logs generated during a 2014 geotechnical investigation at the Haig Precision Manufacturing Corporation property, located approximately 250 feet to the northeast of the site, reported that groundwater was not encountered at the depth of boring termination at approximately 45 feet bgs. Groundwater depth data reviewed in LUST case closure documentation for sites within approximately 0.5 mile of the site indicate that the depth to groundwater in the area typically ranges from approximately 70 to 100 feet below ground surface.
On-site Wells	Site personnel; site owner; visual observations	There are no on-site monitoring wells.
Nearest Groundwater Supply Wells	EDR database report	18 state-registered wells and 8 federally-registered wells are present within one mile of the site; none are registered as public water supply wells.
Geologic Conditions	Shallow soil sampling conducted at the site; 2015 geotechnical investigation at the site; EDR database report	Shallow soil sampling conducted by Environ at the site in January 2015 indicated sandy fill to a depth of approximately 1 to 2 feet bgs and clayey silts to a depth of 5 feet bgs. Boring logs generated during a 2015 geotechnical investigation at the site reported clayey sand fill materials from ground surface to approximately 2 feet bgs followed by clayey sand and sandy clay to approximately 10 feet bgs, and sands with gravel and clay to approximately 20 feet bgs. The EDR physical setting report indicates that surface soil types in the area consist of clay loam, silty clay loam, and sandy clay loam, with moderate infiltration rates. Underlying sediments are reported to be quaternary stratified sequences.
Site Utility Information		
Electricity Supplier	Site personnel	Pacific Gas & Electric (PG&E)
Natural Gas Supplier	Site personnel	PG&E

Table A: Physical Setting and Utility Information		
Conditions	**Source**	**Description**
Use of Fuel Oil for Building Heat	Site owner; site personnel	No current or former use of fuel oil reported.
Water Supplier	Site personnel	San Jose Water Company
Sanitary Sewer	Site personnel	West Valley Collections
Septic Systems	Site owner; site personnel	There are no known current or former septic tanks or leach fields at the site.
Notes: FEMA = Federal Emergency Management Agency; NCCS = National Cooperative Soil Survey ; NWI = National Wetlands Inventory * - Source was provided in the EDR database report.		

3.2 Current Use of Property

The approximately 0.25-acre site is developed with an "L"-shaped, one-story commercial building. According to the site owner, the site building was constructed in approximately 1974. The remainder of the site is a concrete-paved parking lot (Figure 2).

The northern portion of the site building (240 Dillon Avenue) is occupied by Edna's Success, a bakery. Site personnel report the bakery has been at the site since approximately 2008. The bakery produces cookies and cakes for sale at local grocery stores and markets.

The southern portion of the site building (250 Dillon Avenue) is occupied by two recording studios and two artist studios. According to the site owner, the recording studios are utilized in the evening hours for recreational recording sessions and the artist studios are used by painters.

3.3 Current Uses of Adjoining Properties

The site is located in a mixed commercial/industrial/residential land use area. The nearest residential area is located adjacent to the northwest of the site, across Dillon Avenue. Based on discussions with the site owner and site personnel, Environ's visual observations from the property boundary and public rights-of-way, and a limited review of publicly available information, a general determination of the current use of adjacent properties was developed, as described Table B.

Table B: Current Use of Adjacent Properties		
Direction	**Property/Land Use**	**Environ's Observations**
North and northwest	Residential, located across Dillon Avenue	No apparent exterior manufacturing or chemical storage operations were observed. Residential areas consist of single family homes. No concerns were noted.

Table B: Current Use of Adjacent Properties

Direction	Property/Land Use	Environ's Observations
Northeast	Vacant lot (230 Dillon Avenue)	Environ conducted an ESA of 230 Dillon Avenue for Robson Homes in November 2014. Robson Homes acquired the property shortly thereafter. The most recent tenant at 230 Dillon Avenue was West Valley Arborists, who used the parcel for vehicle and equipment storage between 2012 and 2014. No apparent exterior manufacturing or chemical storage operations were observed. No concerns were noted.
East and south	Undeveloped land parcel (280/282 Dillon Avenue)	Environ conducted an ESA of 280/282 Dillon Avenue for Robson Homes in November 2014. Robson Homes acquired the property shortly thereafter. The 280/282 Dillon Avenue parcel is currently vacant and recently completed grading activities in preparation for residential development. One small wooden storage shed remains in place on the northernmost portion of the 280/282 Dillon Avenue parcel, and is not currently used. Additional details regarding the findings of Environ's ESA at the 280/282 Dillon Avenue parcel are provided in Section 4.1.2. No apparent exterior manufacturing or chemical storage operations were observed.
Southeast	Two-story commercial building (260 Dillon Avenue)	The building located at 260 Dillon Avenue appears recently vacated. Scaffolding and construction debris is stacked in the parking lot. According to previous ESAs conducted by Environ for Robson Homes in the vicinity of the site, 260 Dillon was most recently occupied by a roofing company. No apparent exterior manufacturing or chemical storage operations were observed. No concerns were noted.
West	Two-story commercial building occupied by McLean Electric (265 Dillon Avenue); undeveloped lot used by landscaping company. Both properties located across Dillon Avenue.	No apparent exterior manufacturing or chemical storage operations were observed at either 265 Dillon Avenue or the landscaping company yard. The landscaping company yard is used to park company trucks and store equipment inside sheds. No concerns were noted.

Notes:
During the site visit, Environ walked or drove by the borders of these properties that are shared with the subject site. Environ did not enter the neighboring properties with the exception of the 230, 280, and 282 Dillon Avenue parcels which are owned by Robson Homes and for which Environ conducted an ESA in November 2014 and the 260 and 272 Dillon Avenue parcels which Environ investigated on behalf of Robson Homes in April 2015.

4 Review of Public Records and Other Information Sources

4.1 Environmental Regulatory Database Review

Environ contracted with EDR to prepare a summary of listings in federal and state agency databases within applicable radii of the site as specified by the ASTM standard.[1] A copy of the EDR report, dated May 14, 2015, is presented in Appendix B.

4.1.1 Database Review for Site

Environ reviewed the results of the state and federal environmental database searches performed by EDR (see Appendix B) and also searched the Geotracker and Envirostor databases. The site was not listed on any of the databases searched.

4.1.2 Database Review for Adjoining Properties

There are several listings in the EDR database report for off-site properties located adjoining to the site. A summary of the pertinent listings is provided below. Environ's analysis of adjoining properties was based on observations made during the site reconnaissance (as discussed in Table B) and location information for off-site listings as presented in the EDR report. The discussion of adjoining sites does not include listings for certain databases that are (by themselves) not necessarily indicative of a contamination concern (e.g., compliance listings beyond those specified in Section 8.2.1 of the ASTM Standard). Also, for purposes of this analysis, Environ considers "adjoining" properties to be immediately adjacent, even if separated by a road or other physical barrier.

- **280/282 Dillon Avenue.** 280/282 Dillon Avenue property is an undeveloped parcel adjoining to the east and south of the site. The property is listed on the RWQCB Geotracker online database as "Completed – Case Closed as of November 18, 2014". Environ discovered buried waste materials at the property during excavation of test pits to investigate geophysical anomalies as part of a Phase I ESA and subsurface soil investigation conducted at the property for Robson Homes in 2013. During subsequent trenching and environmental sampling investigations, discolored soil, concrete, ash, metal debris and other waste materials were discovered buried across the central portion of the site. Soil samples collected from within the waste debris and adjacent areas had concentrations of lead, arsenic, total petroleum hydrocarbons (TPH) and PCBs above environmental regulatory screening levels for residential land use. In addition, lead concentrations exceeded California Hazardous Waste Levels and Federal Hazardous Waste Levels in several samples.

  In August 2013, the property was entered into a Voluntary Cleanup Agreement (VCA) under regulatory oversight by Santa Clara County Department of Environmental Health (SCCDEH). Site Cleanup Goals (SCGs) for specific contaminants of concern (COCs) were established for the property and soil excavation and debris removal was conducted at

[1] EDR uses the term "radii" to refer to the ASTM terminology "approximate minimum search distance" in the environmental database report.

the property from July to September 2014. Excavated soil was sampled and transported off-site for appropriate landfill disposal. Debris segregated from soil during excavation was also transported off-site for appropriate landfill disposal. Concrete was crushed and stockpiled for reuse. Following excavation, confirmation soil samples were collected from the bases and sidewalls of excavation areas and analyzed for site COCs. Results of confirmation soil sampling indicated that the soil excavation had successfully removed impacted soil and SCGs for site COCs had been achieved. SCCDEH issued a case closure letter approving soil and debris removal activities at the property in a letter dated November 18, 2014.

The property was previously listed on the Facility and Manifest Data (HAZNET) database, which reported that contaminated soil was removed from the site for disposal after a site cleanup in 1997. The incident contact is listed as EH Canfield and Sons, which is a trucking company out of Eugene, Oregon. According to facility personnel, the cleanup was conducted after the fuel tank of a delivery truck hit the road curb while exiting the site after delivering wooden roofing materials. A fuel spill of less than 20 gallons of fuel resulted from the truck tank contacting the curb. Emergency services were immediately notified and the soil removal was conducted in order to address contaminated soil resulting from the fuel spill. Based on available information, the 280/282 Dillon Avenue property is not considered to be of concern for the site at this time.

- **Draeger Construction Inc./Stinson Construction Inc.** The Draeger Construction/Stinson Construction listing is located at 260 Dillon Avenue, adjoining to the southwest of the site. The property is listed on the Historical Substance Storage Container Database (HIST UST), Facility Inventory Database (CA FID UST), and Statewide Environmental Evaluation and Planning System UST Listing (SWEEPS UST) for an 8,000-gallon gasoline UST historically associated with the property. No LUST case or any case closure documentation was available on the RWQCB Geotracker online database.

  Based on documents reviewed at SCCFD, the UST was 5,000 gallons in volume and used to store gasoline. The UST was installed in 1981 and located in the northern portion of the parking lot at the property. A leak monitoring system was installed in 1986. An Inspection Notice from SCCFD indicates the UST and associated piping was removed on January 22, 1998. The UST was reportedly slightly corroded, though no discolorations or odors were observed in the soil beneath the UST and associated piping. Two soil samples were collected beneath the UST and one soil sample was collected beneath the associated piping. Analytical results of the soil samples did not detect TPH as gasoline (TPH-G), methyl tert-butyl ether (MTBE), or benzene, toluene, ethylbenzene, and xylenes (BTEX) above laboratory reporting limits. SCCFD issued case closure on February 10, 1998. Based on available information, the 260 Dillon Avenue property is not considered to be of concern for the site at this time.

4.1.3 Database Review for Non-Adjoining Properties

There are several listings in the EDR database report for off-site non-adjoining properties. A summary of the pertinent listings is provided below. As noted in Table A, shallow groundwater beneath the site likely flows to the northeast. Within this section, Environ did not discuss certain listings for off-site non-adjoining properties that are (by themselves) not necessarily indicative of

a contamination concern (e.g., hazardous waste generators, registered storage tanks, compliance listings). Also, Environ did not discuss herein any off-site non-adjoining property that is listed on a database indicative of a contamination concern but for which regulatory closure has been issued, as the issuance of regulatory closure suggests that impacts to the subject site from the noted off-site property are unlikely. Finally, Environ did not discuss herein any off-site non-adjoining property that is presumed to be downgradient or crossgradient of the subject site. This analysis was based on the assumption that a hazardous material released to the subsurface generally does not migrate laterally within the unsaturated soil for a significant distance, but a hazardous material can migrate in the groundwater in a generally downgradient direction; however, the direction of groundwater flow may be affected by localized topographic, hydraulic, and hydrogeologic conditions.

- **City of Campbell Service Center.** The City of Campbell Service Center, also known as the Corporate Yard, is located at 290 Dillon Avenue in Campbell, California, approximately 150 feet to the south of the site. The property is listed on the Hazardous Waste and Substance Site List (HIST CORTESE), Leaking Underground Storage Tank Incident Reports (LUST), Fuel Leak Site Activity Report (HIST LUST), Historical Substance Storage Container Database (HIST UST), CA FID UST, Certified Unified Program Agency (CUPA Listings) database, SWEEPS UST, Recovered Government Archive LUST (RGA LUST), Emissions Inventory Data (EMI), and HAZNET databases. Environ conducted a Phase I ESA and soil investigation on a small portion of the Corporate Yard for Robson Homes in 2014.

  The LUST listings refer to a closed underground fuel leak case. Other UST database listings refer to fuel or waste USTs currently or historically in use at the Corporate Yard. According to SCCFD and one of the environmental databases (SWEEPS UST), five USTs are known to have been installed at the central portion of the 290 Dillon property between 1969 and 1975, including one 10,000-gallon and one 1,000-gallon gasoline UST, a 1,000-gallon diesel UST, and a 250-gallon waste oil UST. A second environmental database pertaining to USTs (HIST UST) indicated that in addition to the USTs listed above, a 200-gallon “waste” UST was also installed at the Corporate Yard in 1970. No confirmation for this UST was found in the available SCCFD records or other sources.

  The 10,000-gallon gasoline UST and the 1,000-gallon diesel UST were removed in 1987 and were the subject of a LUST case. The LUST case was closed in 1999 after soil sampling indicated that any residual impacts to soil appeared to have been naturally attenuated, and groundwater did not appear to have been impacted. According to case closure documentation, the 1,000-gallon diesel UST may have previously been used as a gasoline UST, suggesting that the reported 1,000-gallon gasoline UST could have been the same tank as the 1,000-gallon diesel UST that was removed.

  The 250-gallon waste oil UST and associated underground piping were removed under fire department oversight in 1998 and a closure letter was issued by the fire department. Fuel dispensers and associated underground fuel piping were removed and replaced under fire department oversight in 1999.

No further UST installation or removal documentation was available, and it is not known if either of the other two reported USTs (i.e., the reported 1,000-gallon gasoline UST and the reported 200-gallon "waste" UST) ever existed at the Corporate Yard, and if they did, whether they have been abandoned in place or removed. There is no current LUST case at the Corporate Yard.

The Corporate Yard is currently permitted to operate a double-chambered UST for gasoline and diesel storage, which is equipped with leak monitoring systems and inspected annually, with leak monitoring system testing performed every three years. The Vehicle and Equipment Maintenance Supervisor of the City of Campbell Public Works Maintenance Division indicated that there are no other USTs currently in use at the Corporate Yard.

The CUPA Listings and HIST CORTESE database listings are related to the prior LUST case. The EMI listing indicates that the site holds a permit from the Bay Area Air Quality Management District (BAAQMD) for emission of particulate matter, carbon monoxide, oxides of nitrogen, reactive organic gases, and/or total organic hydrocarbon gases. The listing indicates that permits were issued from 2009 through 2012.

The HAZNET listings are related to hazardous wastes historically generated by the Corporate Yard, which generally have included waste oil, waste hydrocarbon solvent (i.e., benzene), unspecified mixed solvent, off-specification or surplus organic liquids, and unspecified alkaline solutions. There is no indication that any chlorinated solvents were used or disposed from the property.

However, the HAZNET listings also include two disposals of PCBs or materials containing PCBs in 2009. Based on information from facility personnel, the PCB waste disposal events in 2009 were related to the removal of a hydraulic lift from the southern portion of the garage building at the Corporate Yard site. Facility personnel indicated that while the lift was being removed, the hydraulic cylinder was found to be leaking oil into an underground concrete vault. A sample of the oil was removed from the cylinder and analytical testing indicated that the oil contained PCBs. A hazardous materials contractor performed removal of the oil and all oil-containing equipment, and performed cleaning of the underground concrete vault into which the oil had leaked. After completion of cleaning, a rinsate sample was collected and analytical results indicated that PCBs were not detected. The vault was subsequently sealed with concrete, and all of the PCB-containing oil, related equipment, decontamination solutions, and other related wastes potentially contaminated with PCBs were disposed at Evergreen oil recycling facility in Newark, California.

In September and October 2014, Environ conducted a Phase I ESA and limited soil investigation on a portion of the Corporate Yard site. No RECs were identified. The investigation at the Corporate Yard included the collection of soil samples at a depth of approximately 2 feet bgs and the observation of three test pits that were excavated to approximately 9 to 11 feet bgs. Soil samples were also collected from the base of the test pits and from the soil excavated from the test pits. Soil samples were analyzed for metals, TPH, OCPs, and PCBs. Analytical results of the soil samples did not report any

concentrations that were of concern. Based on available information, the Corporate Yard property is not considered to be of concern for the site.

- **300 Railway Avenue.** The 300 Railway Avenue property is located approximately 250 feet to the southwest of the site. The property is listed on the HIST CORTESE, LUST, HIST LUST, CUPA Listings, RCRA-SQG, FINDS, HAZNET, and EDR US Historical Auto Stations databases for multiple auto repair businesses including Swedish Auto Service, B&J Automotive Repair, Mike's Auto Body, and Stan Nilsson Incorporated. The LUST database indicates that Swedish Auto Service was responsible for a LUST cleanup case. Information obtained from the Geotracker online database indicates that a 500-gallon waste oil UST was removed from the property in March 1987. The tank was noted to have no holes upon removal. The soil underneath the tank was observed to have no petroleum odor or staining. Soil samples collected underneath the tank contained low concentrations of TPH as diesel (TPH-D), oil and grease, and dichlorobenzene. Due to the low concentrations of the contaminants, SCVWD determined that the beneficial uses of groundwater should not be threatened by the residual soil contamination if left in place. The case was granted closure by SCVWD in November 1995. The remaining database listings for the site are consistent with the operation of auto repair businesses and do not necessarily indicate a release at the site. Based on available information, the 300 Railway Avenue property is not considered to be of concern for the site.
- **Son Label, Inc.** The Son Label, Inc. listing is located at 297 Dillon Avenue in Campbell, California, approximately 250 feet to the southwest of the site. The property is listed on the Resource Conservation and Recovery Act (RCRA) Small Quantity Generators (RCRA-SQG) and Facility Index System/Facility Registry System (FINDS) databases. The RCRA-SQG from 1988 indicates the property generated more than 100 and less than 1,000 kilograms (kg) of hazardous waste during any calendar month and accumulated less than 6,000 kg of hazardous waste at any time; or generated 100 kg or less of hazardous waste during any calendar month, and accumulated more than 1000 kg of hazardous waste at any time. Listing indicates no violations found. Based on available information, the Son Label, Inc. property is not considered to be of concern for the site.
- **Railway Distributing, Inc.** The Railway Distributing, Inc. listing is located at 264 Railway Avenue in Campbell, California, approximately 300 feet to the southwest of the site. The property is listed on the CA FID UST, SWEEPS UST, and HIST UST databases for a 1,000-gallon waste tank used for number 6 fuel oil. No LUST case or any documentation was available on the RWQCB Geotracker online database. Based on available information, the Railway Distributing property is not considered to be of concern for the site at this time.
- **Henry Little Tractor Service.** The Henry Little Tractor Service listing is located at 310 Dillon Avenue in Campbell, California, approximately 500 feet to the southwest of the site. The property is listed on the HIST CORTESE, LUST, CUPA Listings, LUST, and HIST LUST databases. The LUST database and review of the Geotracker online database indicate one 4,000-gallon gasoline UST, one 4,000-gallon diesel UST, one 2,000-gallon gasoline UST and associated piping were removed from the property in November 1990. Soil samples collected at a depth of 8 feet bgs below the fill end of the 2,000-gallon

gasoline UST reported concentrations of TPH-D and TPH-G to be 1,100 and 150 parts per million (ppm), respectively. Soil was excavated from the location underneath the fill area of the 2,000-gallon UST. A confirmation sample collected following the excavation at a depth of 12 feet bgs did not report any contaminant concentrations greater than the laboratory reporting limits. Minor concentrations of contaminants (6.6 ppm TPH-D) were reportedly left in place in soil beneath the former location of the 4,000-gallon gasoline UST. SCVWD granted the site case closure in January 1995. Based on available information, the property is not considered to be of concern for the site.

- **500 Railway Avenue.** The 500 Railway Avenue property is located approximately 900 feet to the southwest of the site. The property is listed on the RCRA-SQG, FINDS, LUST, CA FID UST, HIST LUST, SWEEPS UST, HIST UST, and HIST CORTESE database as the Department of Food and Agriculture Pest Detection [sic], Western Gravel, and U-Save Rockery properties. The LUST database and review of the Geotracker online database indicate that nine USTs, ranging in size between 290 and 10,000 gallons, were removed from the site between approximately 1987 and 1992. The tanks were reportedly used to store gasoline, diesel, waste oil, and kerosene. Contaminated soil was observed during the removal of the USTs and soil samples collected underneath the former locations of the USTs reported concentrations of TPH-G, TPH-D, and TPH as motor oil (TPH-MO) to be 1,765, 119, and 15,000 ppm, respectively. Groundwater samples collected from on-site monitoring wells reported minor concentrations (<1 ppm) of TPH-D and BTEX. Approximately 38,000 cubic yards of soil at the property was excavated and approximately 150,000 gallons of groundwater at the property was extracted and treated. Following soil and groundwater remediation, concentrations of TPH-G, TPH-D, and TPH-MO in soil were 39.3, 22, and 26 ppm, respectively, and concentrations of TPH-D and BTEX in groundwater were not detected above laboratory reporting limits. SCVWD granted the site case closure in January 1994. Based on available information, the property is not considered to be of concern for the site.

4.2 Historical Uses of the Site and Adjacent Sites

4.2.1 Past Uses of the Site

The site was residential with small single-family homes until the current building was constructed in approximately 1974. Various businesses including construction companies, optical supply companies, and bakeries have occupied the site building since its construction.

A summary of Environ's key observations from the available historical sources is presented in Table C.

Table C: Summary of Key Observations from Historical Sources for the Subject Site

Historical Source	Key Observations Regarding Site History
Sanborn Maps (1920, 1928, 1935, 1950)	The maps from 1928 and onward show a small dwelling on the northern corner of the property and a small garage located behind the dwelling along the northern property boundary. Beginning in the 1935 map, a small dwelling with attached garage is shown on the central portion of the site. No concerns are noted.

Table C: Summary of Key Observations from Historical Sources for the Subject Site	
Historical Source	**Key Observations Regarding Site History**
Aerial Photographs and Satellite Imagery[1] (1939, 1948, 1950, 1956, 1968, 1974, 1982, 1993, 1998, 2000 – 2014)	Early photographs appear to show small residential structures at the site, although photo quality is poor. The current site building is first clearly shown on the 1982 photograph. No concerns are noted.
Topographic Maps (1899, 1953, 1961, 1968, 1973, 1980)	No development is depicted at the site until 1961, although no individual structures are ever depicted on the maps. No concerns are noted.
City Directory Abstracts (1980, 1985, 1986, 1991, 1996, 2008, 2013)	The occupants of 240 Dillon are listed as: construction company (1980), cabinet company (1985), Soda Butler of San Jose (1986), Tri-Con Optical Supply Company (1991), and multiple bakeries (1996 to 2013). The occupants of 250 Dillon are listed as: Rexroad MC (1985), Plastic Craft (1986), and Pro Mac Painting and Drywall (2008 and 2013).
[1] In addition to aerial photographs provided by EDR, Environ viewed historical satellite imagery provided via Google Earth. Printed copies were not obtained, and imagery dates were not independently verified.	

4.2.2 Past Uses of Adjacent Sites

Environ conducted Phase I ESAs for Robson Homes in 2014 for the properties located at 230, 280, and 282 Dillon Avenue, as discussed in Section 4.1.2. The property adjacent to the south of the site (260 Dillon Avenue) was developed at approximately the same time as the site. Tenants at 260 Dillon Avenue property have included an automobile repair business, construction company, and painting and drywall company. The properties adjacent to the site across Dillon Avenue have primarily been residential with the exception of 265 Dillon Avenue (currently McLean Electric), which was formerly occupied by insurance brokers, a roofing company, and a construction company.

4.3 Review of Local and State Agency Information

Environ visited or otherwise contacted local governmental agencies and regulatory bodies for information relating to the site. An overview of the findings of this review is presented in Table D.

Table D: Local Agency Information for the Site	
Agency Contacted / Document Reviewed	**Information Obtained**
Santa Clara County Tax Assessor	Documents reviewed online using the Santa Clara County Tax Assessor's website included assessment roll information and a tax map. The map indicates that the APN for the site is 412-08-033.

Table D: Local Agency Information for the Site	
Agency Contacted / Document Reviewed	**Information Obtained**
City of Campbell Building Division	Environ reviewed available public records maintained in an online database by the City of Campbell Building Division. Online building department records reported the 240 Dillon address was improved to be a bakery in 1995 and a 2001 complaint stated the 250 Dillon address was being used as a residence. Environ also reviewed available records in person at the Building Division office. Records indicate the property was single-family residential in 1966. Building permits were issued in 1974 and 1980 for both 240 and 250 Dillon Avenue, which were listed as industrial use. Permits issued to current site owner Bob Stedman in 1985 list the 240 Dillon Avenue address as undergoing repairs due to fire damage.
Santa Clara County Fire Department	Environ reviewed available public records maintained in the SCCFD computer system. Records pertaining to the site were available dating back to the 1960s when the site was residential. Records from 1965 indicate two residential structures at the site were deemed uninhabitable by Campbell Fire Department and burned. A 1972 letter from the site owner states the date of construction for the current site building was anticipated to be November 1973 and would serve as a warehouse and offices for Verne Buckle Plumbing. However, Building Division permits for the site building were not issued until August 1974. A May 1977 letter to the Campbell Building Department from site owner R.J. Stedman asks permission for a change of use for the site building in order to operate a sheet metal fabrication company (Jildar Inc.) at the site. Tenant improvement plans for the 240 Dillon Avenue portion of the site building were submitted in 1995 for Marjolaine French Pastries. The tenant improvement plans in 1995 are generally similar to the current layout of 240 Dillon Avenue. Records pertaining to the December 1987 removal of a 5,000-gallon gasoline UST at the site were also available, though the documents had already been provided to Environ by the property owner, as discussed in Section 4.3.1. Hazardous material inspections from 2004 through 2006 for the 250 Dillon Avenue portion of the site building are for ProMac Painting. Records indicate ProMac Painting stored up to 400 gallons of latex paints, 30 gallons of oil base paints, 5 gallons of paint thinners, 20 gallons of propane, and 55 gallons of waste paint and thinner in a drum. Within the 250 Dillon Avenue portion of the site building, the waste drum was stored in the northeast corner, the paint was stored along the east side, and the propane was stored outside to the south of the building. No violations were noted. Hazardous materials inspections from 2007 and 2009 indicate HMI Enterprises, a painting and drywall company, occupied the 250 Dillon Avenue portion of the site building. Records indicate 25 gallons of latex paint and 25 gallons of oil base paint were stored on-site. No hazardous waste was reported. No violations were noted. Records detailing the installation and removal of a 5,000-gallon gasoline UST at 260 Dillon Avenue are discussed in Section 4.1.2. Records also indicate an auto repair business occupied the 260 Dillon Avenue property in approximately 1993. Records indicate the auto repair business stored two 55-gallon waste oil drums, two 55-gallon new engine oil drums, one 16-gallon cleaning solvent drum, one 16-gallon transmission fluid drum, and a solvent tank for parts cleaning in northeast corner of 260 Dillon Avenue property building. No violations were noted.

Table D: Local Agency Information for the Site	
Agency Contacted / Document Reviewed	**Information Obtained**
Santa Clara County Department of Environmental Health (SCCDEH)	Environ requested records from SCCDEH for information regarding soil or groundwater investigations, USTs, LUSTs, hazardous materials inspections, or violations/permits for the property. Environ was informed that no records were found for the 240 Dillon Avenue address. Records provided for 250 Dillon Avenue indicate HMI Enterprises moved from 250 Dillon Avenue in May 2012. Upon vacating the site, HMI Enterprises closed their hazardous materials permit for generating between 5 and 100 kilograms per year of hazardous waste. Environ also searched SCCDEH's online database of LUST, solvent release, and cleanup cases. The database contained no records for the site.
Santa Clara Valley Water District (SCVWD)	Environ requested records from the Santa Clara Valley Water District and was referred to the SCVWD online database of solvent files prior to 2004, at which time local agency oversight was transferred to the Department of Environmental Health. No records related to the site addresses were found on the online database.

4.3.1 Interviews with Site Owner and Site Personnel

On January 15, 2015,Environ conducted a telephone interview with Mr. Stedman, who owns the site through Jildar, Inc. Mr. Stedman, (through Jildar, Inc.), purchased the site in approximately 1976. The current site building was constructed in approximately 1974. Prior to 1974, small single-family homes were located at the site. A concrete contracting business reportedly constructed the site building and also installed a 5,000-gallon UST at the site. The UST, which was removed in 1987, was formerly located on the southern portion of the site and used to store fuel for company vehicles. Upon purchasing the property, Mr. Stedman began operating a sheetmetal fabrication business out of the site building. The sheetmetal business utilized numerical control (NC) and computer numerical control (CNC) machines and electronic presses to fabricate sheetmetal parts for the aerospace industry. After the site owner closed his sheetmetal fabrication business, a painting contractor, trophy and podium manufacturer, and optical supply warehouse occupied the 240 Dillon Avenue and/or 250 Dillon Avenue portions of the site building. In approximately 1995, a bakery began occupying the 240 Dillon Avenue portion of the site building and the current recording and artist studios were constructed at the 250 Dillon Avenue portion of the site building in approximately 2011.

The site owner reported the 5,000-gallon UST formerly located at the site was removed in 1987 because it was not being used. Documents provided by the site owner and reviewed at SCCFD indicate the UST was removed on December 22, 1987. Two soil samples were collected 2 feet beneath the base of the UST at a depth of 16 feet bgs. Analytical results of the soil samples did not detect TPH-G or BTEX above laboratory reporting limits.

An interview was also conducted during the site visit on January 20, 2015 with David Posey, co-owner of Edna's Success, who has operated Edna's Success at the site since approximately 2008. No chemical use or storage, with the exception of common household cleaners, was observed by Environ or reported by Mr. Posey. According to Mr. Posey, a drywall contractor

occupied the 250 Dillon Avenue portion of the building from approximately 2008 to 2011, at which time the current recording and artist studios were constructed. Mr. Posey reported the site parking lot floods during heavy rains due to lack of drainage from the catch basin located in the center of the site parking lot. The flooding reportedly does not enter the site building.

Environ conducted a walkthrough of the 250 Dillon Avenue portion of the site building on January 16, 2015. One recording studio and two artist studios were observed, although Environ was unable to gain access to a second recording studio which was locked. The artist studios are apparently used by oil painters. No concerns were noted.

4.4 Environmental Lien Record Search

A review of EDR Environmental Lien Search Report dated January 30, 2015 to identify environmental liens or activity use limitations (AULs) imposed by judicial authorities with respect to the property. No environmental liens or AULs were found.

4.5 Previous Environmental Assessments and Activities

Environ is not aware of any previous environmental site assessments conducted at the site. As discussed in Section 4.3.1, a 5,000-gallon UST was removed from the site in December 1987. Analytical results of soil samples collected underneath the UST did not detect TPH-G or BTEX above laboratory reporting limits.

4.6 User-Provided Information

Environ provided the client with a User Questionnaire (consistent with Appendix X3 of the ASTM Standard) that requested information relating to environmental liens, AULs, specialized knowledge of the property, property value diminution, chain-of-title, or any other commonly known or obvious indications of site contamination, that was not otherwise provided to Environ. Responses from the User Questionnaire are discussed in the relevant sections of this report.

5 Site Reconnaissance

5.1 Methodology and Limiting Conditions

Jason Kane of Environ conducted site reconnaissance visits on January 16 and January 20, 2015. During the site visits, observations of the site were made to evaluate if any RECs, as defined in Chapter 2, are present.

5.2 General Site Setting and Observations

Environ made observations during the site visits concerning all of the interior and exterior issues specified in Sections 9.4.2 through 9.4.4 of the ASTM E1527-13 Standard. The presence or absence of each issue of environmental interest or concern is noted in Table E. Only those areas of environmental interest or concern that were observed at the site are discussed further in the text below.

Table E: Summary of Site Reconnaissance Observations

Issue	ASTM Section	Observation
Interior and Exterior Issues		
Current use(s) of the property	9.4.2.1	See Section 3.2
Past use(s) of the property	9.4.2.2	See Section 3.2 and 4.2
Hazardous substances and petroleum products used, treated, stored, disposed of, or generated on the property in connection with identified present or past uses	9.4.2.3	**Historically Present** (see Section 5.2.1)
Storage tanks: Underground storage tanks (fill ports, vent pipes, manholes) Aboveground storage tanks (ASTs)	9.4.2.4	 **Historically Present** Absent (see Section 5.2.2)
Odors (strong, pungent or noxious)	9.4.2.5	Absent
Pools of liquid, standing surface water or sumps	9.4.2.6	**Historically Present** (see Section 5.2.3)
Drums of hazardous substances or petroleum products (for example, five-gallon, 55-gallon or totes)	9.4.2.7	**Historically Present** (see Section 5.2.1)
Hazardous substance and petroleum product containers (not necessarily in connection with identified uses)	9.4.2.8	Absent

Table E: Summary of Site Reconnaissance Observations		
Issue	**ASTM Section**	**Observation**
Unidentified substance containers suspected of containing hazardous substances or petroleum products	9.4.2.9	Absent
Polychlorinated biphenyls (PCBs) Electrical equipment on-site (e.g., transformers, capacitors) Electrical equipment known or likely to contain PCBs Hydraulic equipment on-site (e.g., elevators, truck dock lifts) Hydraulic equipment known or likely to contain PCBs	9.4.2.10	Absent
Interior Issues		
Heating/cooling systems	9.4.3.1	**Present** (see Section 5.2.4)
Stains or corrosion on interior floors, walls or ceilings (except for staining from water)	9.4.3.2	Absent
Floor drains and interior sumps	9.4.3.3	**Present** (see Section 5.2.5)
Exterior Issues		
Pits, ponds or lagoons on property or adjacent sites	9.4.4.1	Absent
Stained soil or pavement	9.4.4.2	Absent
Stressed vegetation (from other than insufficient water)	9.4.4.3	Absent
On-site solid waste disposal; areas apparently filled or graded by non-natural causes; or mounds or depressions suggesting solid waste disposal	9.4.4.4	Absent
Wastewater or other liquid (including storm water) or any discharge into a drain, ditch, underground injection system or stream on or adjacent to the property	9.4.4.5	Absent
Wells (including dry wells, irrigation wells, injection wells, abandoned wells, or other wells)	9.4.4.6	**Present** (see Section 5.2.6)
Septic systems or cesspools	9.4.4.7	Absent
Notes: Observations noted in this table and discussed further below are based on information obtained during the site visits and from a review of the sources summarized in Chapter 4. See the ASTM Standard for a detailed description of the issues included in each referenced ASTM section. Per the ASTM Standard, fluorescent light ballasts likely to contain PCBs do not need to be noted.		

5.2.1 Hazardous Substances and Petroleum Products

From 2004 through 2006, hazardous material inspections were performed at ProMac Painting, which was located in the 250 Dillon Avenue portion of the site building. Records indicate ProMac Painting stored up to 400 gallons of latex paints, 30 gallons of oil base paints, 5 gallons

of paint thinners, 20 gallons of propane, and 55 gallons of waste paint and thinner in a drum. Within the 250 Dillon Avenue portion of the site building, the waste drum was stored in the northeast corner, the paint was stored along the east side, and the propane was stored outside to the south of the building. No violations were noted. Hazardous materials inspections from 2007 and 2009 indicate HMI Enterprises, a painting and drywall company, occupied the 250 Dillon Avenue portion of the site building. Records indicate 25 gallons of latex paint and 25 gallons of oil base paint were stored on-site. No hazardous waste was reported and no violations were noted for ProMac Painting or HMI Enterprises. A 5,000-gallon gasoline UST was also located at the site from approximately the time of the site building's construction in 1974 until 1987. The historical uses of hazardous substances and petroleum products are not considered to be of concern for the site.

5.2.2 Underground Storage Tank

A 5,000-gallon gasoline UST formerly located at the site was removed in 1987. Documents provided by the site owner and reviewed at SCCFD indicate the UST was removed on December 22, 1987. Two soil samples were collected 2 feet beneath the base of the UST at a depth of 16 feet bgs. Analytical results of the soil samples did not detect TPH-G or BTEX above laboratory reporting limits. The former UST is not considered to be a concern for the site.

5.2.3 Historical Flooding

Site personnel reported the site parking lot floods during heavy rains due to lack of drainage from the catch basin located in the center of the site parking lot. The flooding reportedly does not enter the site building.

5.2.4 Heating and Cooling systems

Natural gas-supplied heating units are located on the roof of the site building and inside the bakery. Roof-mounted cooling and refrigeration units are also located on the roof and inside the bakery. The cooling and refrigeration units use refrigerant 404a (R-404A).

5.2.5 Floor drains

Environ observed floor drains in the bakery associated with the dishwashing equipment, sinks, and wall-mounted refrigeration equipment. The floor drains were observed to be in good condition.

5.2.6 Parking Lot Catch Basin

Environ observed a catch basin located in the center of the site parking lot. According to site personnel, the catch basin contains gravel and is not connected to the municipal storm sewer system. As discussed in Seciton 5.2.3, site personnel reported the site parking lot floods during heavy rains due to lack of drainage from the catch basin. The flooding reportedly does not enter the site building.

6 Soil Sampling and Analysis

Environ conducted shallow soil sampling at the site on January 16, 2015. Figure 3 shows the locations of the soil samples and Tables 1 through 4 summarize the results of soil sample analyses.

6.1 Pre-Field Activities

Environ prepared a site-specific health and safety plan (HASP) and notified Underground Service Alert (USA) of the sampling activities at least two working days prior to the start of intrusive sampling, as required by law. Environ contracted with Subdynamic Locating Services, Inc., a private utility locating company located in San Jose, California, to clear proposed boring locations of underground utilities. Environ also contracted with Penecore Drilling of Woodland, California (Penecore) to perform direct-push technology (DPT) drilling activities and construct semi-permanent soil gas wells, and with analytical laboratories to perform soil and soil gas sample analyses.

6.2 Collection of Soil Samples for Chemical Analysis

On January 16, 2015, soil samples were collected for chemical analyses at locations SB01 through SB05 and SG01 through SG04 (see Figure 3). At locations except SG03, a soil boring was advanced to a depth of approximately 5 feet bgs and soil was screened for VOCs using a calibrated photoionization detector (PID). The soil boring at location SG03 was advanced to a depth of approximately 20 feet bgs. Soil screened by the PID for VOCs during sampling read less than 1.0 parts per million by volume (ppmv) as hexane though at all sampling locations. Observations were recorded at each borehole to document soil lithology and any indications of staining or other visual evidence of impacts.

Soil borings SB01 and SB03 were located in the approximate locations of former residential structures at the site. SB02, SB04, and SB05 were located to provide general coverage during soil sampling. Soil boring SG01 was located in the approximate former location of a fuel pump associated with a 5,000-gallon UST that was formerly located at the site. SG02 was located in the approximate location of the piping that connected said former fuel pump and UST. SG03 was located in the approximate former location of the UST and was advanced to a depth of 20 feet bgs in order to sample soil located below the former UST. The base of the former UST was reportedly located at 14 feet bgs. SG04 was located approximately 15 feet to the northwest and downgradient of the former UST.

All soil samples were collected in laboratory-provided glass jars, labeled, placed in doubled zip-closure bags, and stored on ice in an insulated cooler. Samples were transported to McCampbell Analytical Inc. with chain-of-custody documentation for chemical analysis on a five-day turnaround. All soil samples were analyzed for CAM17 metals by Environmental Protection Agency (EPA) Method 6020, OCPs by EPA Method 8081A, and PCBs by EPA Method 8082. Samples SG01 through SG04 were also analyzed for TPH (gasoline, diesel, motor oil ranges) by EPA Method 8015B.

6.3 Collection of Samples for Naturally Occurring Asbestos Analysis

Samples of base rock material beneath concrete-paved areas were collected for naturally-occurring asbestos (NOA) analysis at locations SB03, SB04, and SG03. The samples were collected in labeled zip-closure bags and were transported to McCampbell Analytical Inc. under chain-of-custody documentation for NOA analysis by California Air Resources Board (CARB) Method 435. The samples were requested to be combined into one (1) three-point composite sample prior to analysis.

6.4 Soil Analytical Results – Chemical Analyses

Sample analytical results for metals indicated that metal concentrations in all samples are below Cal-Modified or USEPA Regional Screening Levels (RSLs) for residential land use or, in the case of arsenic, consistent with typical naturally-occurring concentrations. Analytical results for metals are summarized in Table 1. The laboratory analytical report is provided in Appendix D.

Sample analytical results for OCPs indicated that localized areas of the site contain very low concentrations of pesticides, but none of the concentrations exceeded industrial/commercial or residential land use RSLs. Concentrations of total PCBs were not detected above laboratory screening levels. Analytical results for OCPs are summarized in Table 2. The laboratory analytical report is provided in Appendix D.

Concentrations of TPH-G and TPH-D were not detected above the laboratory reporting limit of 1.0 milligram per kilogram (mg/kg). TPH-MO was not detected above the laboratory reporting limit of 5.0 mg/kg except in SG02 where the reported concentration was 12 mg/kg, well below the residential RSL of 2,500 mg/kg. Analytical results TPH are summarized in Table 3. The laboratory analytical report is provided in Appendix D.

6.5 Soil Analytical Results – NOA Analyses

One (1) three-point composite soil sample was collected and submitted for NOA analysis, as described in Section 6.3. The results of the analysis indicated that 0.50% of chrysotile-type asbestos was detected in the composite sample. Since this one sample is above 0.25%, the level at which compliance with Bay Area Air Quality Management District (BAAQMD) guidelines is required, compliance with BAAQMD guidelines may be needed if the aggregate base beneath the concrete and asphalt is disturbed. Analytical results for NOA are provided in Table 4. The laboratory analytical report is provided in Appendix D.

6.6 Soil Sampling During Potholing Activities and Geophysical Investigation

A geophysical survey of the site was performed by JR Associates Inc. in January 2015. The purpose of this survey was to confirm that the former 5,000-gallon UST was no longer present at the Dillon parcel and to determine if any subsurface metallic anomalies are present at the site. The results of the survey indicated two locations at the site had subsurface metallic anomalies, referred to as A1 and A2 in Figure 3. On January 16, 2015 Robson Homes' contractor, Phase 3 Communications, used a pressure washer and vacuum truck to excavate approximately 6-inch diameter potholes in the locations of the metallic anomalies. Environ observed no visual evidence of USTs or other metallic objects during potholing excavation activities.

During potholing excavation activities, Environ also collected soil samples for laboratory analysis. The soil samples were collected using a hand auger and at a depth of approximately 5.0 feet bgs at locations A1 and A2. The samples were collected in laboratory-provided glass jars, labeled, placed in doubled zip-closure bags, and stored on ice in an insulated cooler. Samples were transported to McCampbell Analytical Inc. with chain-of-custody documentation and analyzed CAM17 metals by EPA Method 6020, OCPs by EPA Method 8081A, and PCBs by EPA Method 8082.

Sample analytical results for metals indicated that metal concentrations in samples A1 and A2 are below Cal-Modified or USEPA Regional Screening Levels (RSLs) for residential land use or, in the case of arsenic, consistent with typical naturally-occurring concentrations. Analytical results for metals are summarized in Table 1. The laboratory analytical report is provided in Appendix D.

Concentrations of OCPs and PCBs were not detected above laboratory screening levels. Analytical results for OCPs are summarized in Table 2. The laboratory analytical report is provided in Appendix D. Based on the results of soil sampling conducted at the site, no additional investigation is recommended at this time.

7 Soil Gas Sampling and Analysis

Environ constructed semi-permanent soil gas wells at the site as part of shallow soil sampling on January 16, 2015. Figure 3 shows the locations of the soil gas samples collected January 20, 2015. Table 5 presents the results of soil gas sample analyses.

7.1 Soil Gas Probe Construction

As described in Section 6.2, Penecore advanced soil borings SG01 through SG04 on January 16, 2015 to a depth of approximately 5 feet bgs, with the exception of SG03 which was advanced to a depth of 20[2] feet bgs. Following soil sampling activities, soil gas probes were installed at locations SG01, SG02, and SG04 at a depth of approximately 4.5 feet bgs and at location SG03 at a depth of approximately 18 feet bgs in accordance with the RWQCB and DTSC Advisory on Active Soil Gas Investigations, dated April 2012. The locations of the soil gas probes (SG01 through SG04) are shown in Figure 3.

7.2 Soil Gas Sampling

Soil gas sampling was conducted by Environ personnel on January 20, 2015. Individually-cleaned and certified 1-liter stainless steel Summa canisters and flow controller assemblies provided by Eurofins Calscience were used to sample each soil gas well. A GilAir low flow pump was used to purge three volumes of air from each soil gas probe in accordance with the RWQCB and DTSC Advisory on Active Soil Gas Investigations. Purging proceeded at a rate approximately 190 cubic centimeters per minute (cc/min). A plastic container was placed over the top of each probe and a paper towel sprayed with 1,1-difluoroethane (1,1-DFA) was placed inside the container in order to provide an atmosphere of leak check compound around the top of each probe to check for ambient air intrusion during sampling. After completion of purging, the valve on the Summa canister was opened, allowing sample air to fill the canister at a rate no greater than 200 cc/min. The canister valve was closed when approximately -2 to -3 inches of mercury in vacuum remained inside the canister. Each canister was labeled and shipped to Eurofins Calscience via overnight Fedex under chain-of-custody documentation for chemical analysis of VOCs by EPA Method TO-15 (including 1,1-DFA) on standard turnaround time.

7.3 Soil Gas Sampling Analytical Results

The results of analysis indicate that all concentrations detected at or above laboratory reporting limits were below established Cal-modified or USEPA residential and industrial/commercial RSLs for each analyte. Acetone was detected in all four samples at concentrations ranging between 12 and 21 microgram per liter (µg/m^3), well below the residential land use RSL of 32,000,000 µg/m^3. Tetrachlorethylene (PCE) was detected in samples SG01 and SG03 at concentrations of 4.5 and 13 µg/m^3, respectively, below the residential land use RSL of 410 µg/m^3. The leak check compound 1,1,-DFA was not detected in any of the samples with the exception of SG04, which reported a 1,1-DFA concentration of 31 µg/m^3. The analytical results

[2] This probe was advanced to a deeper depth to confirm that no releases of VOCs had occurred from the former UST, which had been located nearby SG03.

of the soil gas sampling are summarized in Table 5. The laboratory analytical report is provided in Appendix D. Based on the results of soil gas sampling conducted at the site, no additional investigation is recommended at this time.

8 Findings, Opinion, and Conclusions

Environ has performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM Practice E1527-13, as well as a shallow soil and soil gas investigation, at the property located at 240 and 250 Dillon Avenue in Campbell, California. Any exceptions to, or deletions from, this practice are described in Section 8.3.

8.1 Findings and Opinion

8.1.1 Recognized Environmental Conditions

Environ did not identify any "recognized environmental condition[s]" (REC[s]), as defined by ASTM (see Chapter 2.0), in connection with residential use of the property. No further investigation of the site is warranted at this time.

8.1.2 Other Findings

Environ identified the following additional findings that are not considered RECs based on available information:

- **Underground Storage Tank Removal at the Site.** Environ reviewed historical documents relating to the removal of a 5,000-gallon gasoline UST at the site. The UST was reportedly installed by a concrete contracting business in approximately 1974 when the site building was constructed. The UST, which was removed in 1987, was formerly located on the southern portion of the site and used to store fuel for company vehicles. Documents provided by the site owner and reviewed at SCCFD indicate the UST was removed on December 22, 1987. Two soil samples were collected 2 feet beneath the base of the UST at a depth of 16 feet bgs. Analytical results of the soil samples did not detect TPH-G or BTEX above laboratory reporting limits. During Environ's subsurface investigation in January 2015, soil and soil gas samples collected at and in the vicinity of the former UST location also did not show evidence of a release from the UST. Specifically, results of the soil sample collected beneath the location of the former UST did not report TPH fractions of gasoline, diesel, or motor oil greater than respective laboratory reporting limits.
- **Naturally-Occurring Asbestos in Aggregate Base.** Sample analytical results for NOA in one three-point composite sample collected from aggregate base rock beneath the concrete-paved parking lot at the site reported the asbestos type chrysotile was present in the sample at a concentration of 0.50%. Since this one sample is above 0.25%, the level at which compliance with Bay Area Air Quality Management District (BAAQMD) guidelines are triggered, an asbestos dust mitigation plan may need to be implemented if the aggregate base rock layer is disturbed during construction.

8.1.3 *De Minimis* Conditions

De minimis conditions are those that do not represent a material risk of harm to public health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies. Environ identified the following *de minimis* conditions related to the site:

- **Flooding in Site Parking Lot.** Site personnel reported the site parking lot floods during heavy rains due to lack of drainage from the catch basin located in the center of the site parking lot. The catch basin reportedly contains gravel and is not connected to the municipal storm sewer system.

8.2 Conclusions

Environ has performed this Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM Practice E 1527-13, of the property located at 240 and 250 Dillon Avenue in Campbell, California. Any exceptions to, or deletions from, this practice are described in Section 8.3 of this report. This assessment has revealed evidence of no recognized environmental conditions at the site.

8.3 Analysis of Data Gaps

The ASTM Standard defines a data gap as "a lack of or inability to obtain information required by the practice despite good faith efforts by the environmental professional to gather such information." A data gap is only significant if other information obtained during the ESA, or professional experience, raises reasonable concerns and affects the ability of the environmental professional to identify whether a given issue is a REC. The ASTM Standard requires that the ESA report identify and comment on significant data gaps. Limiting conditions and deviations to the ASTM Standard for the assessment are discussed below.

- Environ was unable to observe a small room located in the 250 Dillon Avenue portion of the site building. The room is reportedly occupied by a recording studio and is unlikely to be of concern for the site.

None of the exceptions, deletions, deviations, or site reconnaissance limitations noted above are considered to represent significant data gaps.

9 References

9.1 Documents

Civil Engineering Associates (CEA). 2013. *ALTA/ACSM Land Title Survey, 280 Dillon Avenue*. April 17.

EDR. 2014. *Aerial Photo Decade Package: Inquiry Number 4052600.9.* September 3.

EDR. 2014. *City Directory, Abstract, Inquiry Number 4052600.5*. September 3.

EDR. 2015. *Environmental Lien Search, Inquiry Number 4192527.1*. January 30.

EDR. 2014. *Historical Topographic Map Report, Inquiry Number 4052600.4*. September 2.

EDR. 2015. *Radius Map, Inquiry Number: 04294457.2r*. May 14.

EDR. 2014. *Sanborn® Map Report, Inquiry Number 4052600.3*. September 2.

Environ. 2014. *Phase I Environmental Site Assessment and Subsurface Soil Investigation, 190 Dillon Avenue, Campbell, California.* June.

Environ. 2014. *Phase I Environmental Site Assessment and Subsurface Soil Investigation, 466, 472, 482, 488, Sam Cava Lane, Campbell, California.* May 23.

Environ. 2014. *Phase I Environmental Site Assessment, 230, 280, and 282 Dillon Avenue, Campbell, California.* November 24.

Environ. 2014. *Phase I Environmental Site Assessment and Soil Investigation, Portion of 290 Dillon Avenue, Campbell, California.* November 25.

First American Title Company. 2015. *Preliminary Title Report, 240 Dillon Avenue, Campbell, California.* May 12.

Geo-Logic Associates. 2015. *Robson Homes Geotechnical Investigation 240 Dillon Avenue, Campbell, California*. February 18.

JR Associates. 2015. *Magnetic Investigation at 240 Dillon Avenue in Campbell, California.* January 13.

Sierra Environmental, Inc. 2015. *Building Survey Report for Suspect Asbestos-Containing Material and Lead in Paint, 240, 250, 260, 272 Dillon Avenue, Campbell, California.* March 20.

9.2 Interviews

Bob Stedman. Site Owner. 2015. Personal interview. January 16.

David Posey. Co-owner of Edna's Success (240 Dillon Avenue). 2015. Personal Interview. January 20.

Tables

Table 1: Metals in Soil Samples
Results of Soil Sampling
240 and 250 Dillon Avenue, Campbell, California

Sample ID	Sample Depth (feet bgs)	Sample Date	Antimony	Arsenic*	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
SB01_1.5	1.5	1/16/2015	**0.66**	**6.1**	**160**	**0.57**	**0.26**	**97**	**22**	**31**	**11**	ND<0.050	**1.4**	**270**	ND<0.50	ND<0.50	ND<0.50	**49**	**72**
SB02_1.0	1.0	1/16/2015	**0.89**	**8.5**	**210**	**0.71**	**0.44**	**72**	**18**	**41**	**35**	**0.11**	**1.6**	**120**	**0.56**	ND<0.50	ND<0.50	**56**	**120**
SB03_1.0	1.0	1/16/2015	**0.56**	**7.1**	**180**	**0.63**	**0.29**	**63**	**16**	**36**	**11**	**0.055**	**1.3**	**97**	**0.59**	ND<0.50	ND<0.50	**52**	**78**
SB04_1.0	1.0	1/16/2015	**0.58**	**7**	**190**	**0.6**	**0.32**	**65**	**16**	**35**	**14**	ND<0.050	**1.6**	**90**	**0.55**	ND<0.50	ND<0.50	**55**	**85**
SB05_1.0	1.0	1/16/2015	**0.61**	**8.3**	**230**	**0.65**	**0.32**	**65**	**17**	**38**	**11**	**0.055**	**1.5**	**95**	**0.53**	ND<0.50	ND<0.50	**55**	**84**
SG01_2.0	2.0	1/16/2015	**0.58**	**8.5**	**160**	**0.52**	**0.45**	**62**	**14**	**36**	**37**	ND<0.050	**1.2**	**79**	ND<0.50	ND<0.50	ND<0.50	**54**	**98**
SG02_1.0	1.0	1/16/2015	ND<0.50	**6.3**	**120**	ND<0.50	**0.36**	**49**	**13**	**34**	**23**	ND<0.050	**0.98**	**69**	ND<0.50	ND<0.50	ND<0.50	**49**	**93**
SG03_18.0	18.0	1/16/2015	ND<0.50	**6.1**	**120**	ND<0.50	ND<0.25	**73**	**25**	**31**	**7.4**	ND<0.050	**0.78**	**290**	ND<0.50	ND<0.50	ND<0.50	**66**	**72**
SG04_1.0	3.5	1/16/2015	**0.67**	**7.8**	**200**	**0.75**	**0.30**	**72**	**18**	**41**	**12**	ND<0.050	**1.6**	**100**	**0.65**	ND<0.50	ND<0.50	**61**	**94**
A1_5.0	5.0	1/16/2015	ND<0.50	**5.8**	**130**	ND<0.50	ND<0.25	**63**	**12**	**30**	**7.2**	ND<0.050	**0.83**	**78**	ND<0.50	ND<0.50	ND<0.50	**51**	**62**
A2_5.0	5.0	1/16/2015	ND<0.50	**4.3**	**96**	ND<0.50	ND<0.25	**58**	**11**	**28**	**5.8**	ND<0.050	**0.54**	**62**	ND<0.50	ND<0.50	ND<0.50	**55**	**55**
Industrial/Commercial RSL			470	3.0	220,000	180[1]	6.4[1]	1,800,000[2]	350	47,000	320[1]	40	5,800	22,000	5,800	5,800	12	5,800	350,000
Residential RSL			31	0.67	15,000	15[1]	4.6[1]	120,000[2]	23	3,100	80[1]	9.4	390	1,500	390	390	0.78	390	23,000

Notes:
Detected compounds are shown in **bold**.
All data are reported in milligrams per kilogram (mg/kg), unless noted otherwise
*Arsenic is naturally-occurring in soil at concentrations up to 20 mg/kg.

California Assessment Manual 17 (CAM17) metals analyzed by EPA Method 6020

[1] DTSC HHRA Note 3 value. July 14, 2014

[2] RSLs reported for chromium(III), insoluble salts
bgs = below ground surface
DTSC = Department of Toxic Substances Control
HHRA = Human Health Risk Assessment
ND = not detected at or above the laboratory reporting limit shown
RSL = regional screening level
Source : USEPA Screening Levels for Chemical Contaminants, January 2015 update. Regional Screening Level (RSL) Summary Table (TR=1E-6, HQ=1).
STLC Source: California Code of Regulations, Title 22, Chapter 11, Article 3
TCLP Source: 40 CFR 261, appendix II, 1993 ed., as amended by 58 FR 46040, Aug 31, 1993

Table 2: Organochlorine Pesticides Detected in Soil Samples
Results of Soil Sampling
240 and 250 Dillon Avenue, Campbell, California

Sample ID	Sample Depth (feet bgs)	Sample Date	p,p-DDD	p,p-DDE	p,p-DDT
SB01_1.5	1.5	1/16/2015	ND<0.0010	**0.0023**	**0.0012**
SB02_1.0	1.0	1/16/2015	ND<0.0010	**0.0073**	**0.0053**
SB03_1.0	1.0	1/16/2015	ND<0.0010	ND<0.0010	ND<0.0010
SB04_1.0	1.0	1/16/2015	ND<0.0010	**0.0029**	**0.0019**
SB05_1.0	1.0	1/16/2015	ND<0.0010	**0.0011**	ND<0.0010
SG01_2.0	2.0	1/16/2015	**0.0015**	**0.022**	**0.012**
SG02_1.0	1.0	1/16/2015	ND<0.0050	**0.013**	**0.0054**
SG03_18.0	18.0	1/16/2015	ND<0.0010	ND<0.0010	ND<0.0010
SG04_1.0	1.0	1/16/2015	ND<0.0010	ND<0.0010	ND<0.0010
A1_5.0	5.0	1/16/2015	ND<0.0010	ND<0.0010	ND<0.0010
A2_5.0	5.0	1/16/2015	ND<0.0010	ND<0.0010	ND<0.0010
Industrial/Commercial RSL			9.6	6.8	8.6
Residential RSL			2.2	1.6	1.9

Notes:
*Analysis for PCBs reported no concentrations above analytical reporting limits.

Only compounds detected above the laboratory reporting limit are included in the table.
Detected compounds are shown in **bold**.
All data are reported in milligrams per kilogram (mg/kg).

Organochlorine pesticides (OCPs) analyzed by EPA Method 8081A
Polychlorinated biphenyls (PCBs) analyzed by EPA Method 8082

bgs = below ground surface
DDE = dichlorodiphenylethylene
DDT = dichlorodiphenyltrichloroethane
EPA = Environmental Protection Agency
ND = not detected at or above the laboratory reporting limit shown
PCB = polychlorinated biphenyls
RSL = regional screening level
Source : USEPA Screening Levels for Chemical Contaminants, January 2015 update. Regional Screening Level (RSL) Summary Table (TR=1E-6, HQ=1).

Table 3: Total Petroleum Hydrocarbons in Soil Samples
Results of Soil Sampling
240 and 250 Dillon Avenue, Campbell, California

Sample ID	Sample Depth (feet bgs)	Sample Date	TPH-G	TPH-D	TPH-MO
SG01_2.0	2.0	1/16/2015	ND<1.0	ND<1.0	ND<5.0
SG02_1.0	1.0	1/16/2015	ND<1.0	ND<1.0	**12**
SG03_18.0	18.0	1/16/2015	ND<1.0	ND<1.0	ND<5.0
SG04_1.0	1.0	1/16/2015	ND<1.0	ND<1.0	ND<5.0
Commercial/Industrial RSL			420	440	33,000
Residential RSL			82	96	2,500

Notes:
Detected compounds are shown in **bold**.
All data are reported in milligrams per kilogram (mg/kg).

Total Petroleum Hydrocarbons analyzed by EPA Method 8015B

bgs = below ground surface
EPA = Environmental Protection Agency

RSL = regional screening level
Source : USEPA Screening Levels for Chemical Contaminants, January 2015 update. Regional Screening Level (RSL) Summary Table (TR=1E-6, HQ=1).
ND = not detected at or above the laboratory reporting limit shown
TPH-G = Total Petroleum Hydrocarbons as Gasoline (C6-C12)
TPH-D = Total Petroleum Hydrocarbons as Diesel (C10-C23)
TPH-MO = Total Petroleum Hydrocarbons as Motor Oil (C18-C36)

Table 4: Natural Occurring Asbestos in Soil Samples
Results of Soil Sampling
240 and 250 Dillon Avenue, Campbell, California

Location ID	Composite Sample ID	Sample Date	Percent Estimate in Matrix	Asbestos Type(s) Detected
SB03	SB04,SG04,SB03_NOA	1/16/2015	**0.50%**	**Chrysotile**
SB04				
SG03				

Notes:
NOA analyzed by CARB Method 435

CARB 435 = California Air Resources Board Method 435; June 6, 1991.
ID = identification
ND = not detected
NOA = naturally occurring asbestos

Table 5: VOCs in Soil Gas Samples
Results of Soil Gas Sampling
240 and 250 Dillon Avenue, Campbell, California

Location	Sample ID	Sample Date	Acetone	Benzene	Chloro-methane	Ethanol	o-Xylene	Tert-Butyl Alcohol (TBA)	PCE	Toluene	1,1,1-Trichloro-ethane	1,3,5-Trimethyl-benzene	1,1-Difluoro-ethane
SG01	SG01_20150120	1/20/2015	**17**	ND<1.7	ND<1.1	ND<10	ND<2.3	**24**	**4.5**	ND<2.0	ND<2.9	ND<2.6	ND<5.7
SG02	SG02_20150120	1/20/2015	**21**	ND<1.6	ND<1.0	ND<9.4	ND<2.2	ND<6.1	ND<3.4	ND<1.9	ND<2.7	ND<2.5	ND<5.4
SG03	SG03_20150120	1/20/2015	**18**	**1.8**	ND<1.0	**10**	ND<2.2	ND<6.1	**13**	**3.5**	**4.2**	ND<2.5	ND<5.4
SG04	SG04_20150120	1/20/2015	**12**	ND<1.6	ND<1.1	ND<9.7	ND<2.2	ND<6.2	ND<3.5	ND<1.9	ND<2.8	ND<2.5	**31**
Ambient Air	AA_20150120	1/20/2015	**19**	ND<1.8	**1.3**	**20**	**3.5**	ND<6.8	ND<3.8	**2.3**	ND<3.1	**2.9**	ND<6.1
Screening Value Derived from DTSC-Modified RSL or USEPA RSL for Residential Future Building (µg/m^3)[1]			32,000,000 USEPA 2014	84 Cal/EPA 2014a	94,000 USEPA 2014	NA	100,000 USEPA 2014	NA	410 Cal/EPA 2014a	310,000 Cal/EPA 2014a	1,040,000 Cal/EPA 2014a	37,000 Cal/EPA 2014a	42000000 USEPA 2014
Screening Value Derived from DTSC-Modified RSL or USEPA RSL for Commercial Future Building (µg/m^3)[1]			280,000,000 USEPA 2014	840 Cal/EPA 2014a	780,000 USEPA 2014	NA	880,000 USEPA 2014	NA	4,160 Cal/EPA 2014a	2,600,000 Cal/EPA 2014a	8,800,000 Cal/EPA 2014a	300,000 Cal/EPA 2014a	360000000 USEPA 2014

Notes:
Results reported in micrograms per cubic meter (µg/m^3)
Detected compounds are shown in **bold**.

Analyses for VOCs conducted by USEPA Method TO-15

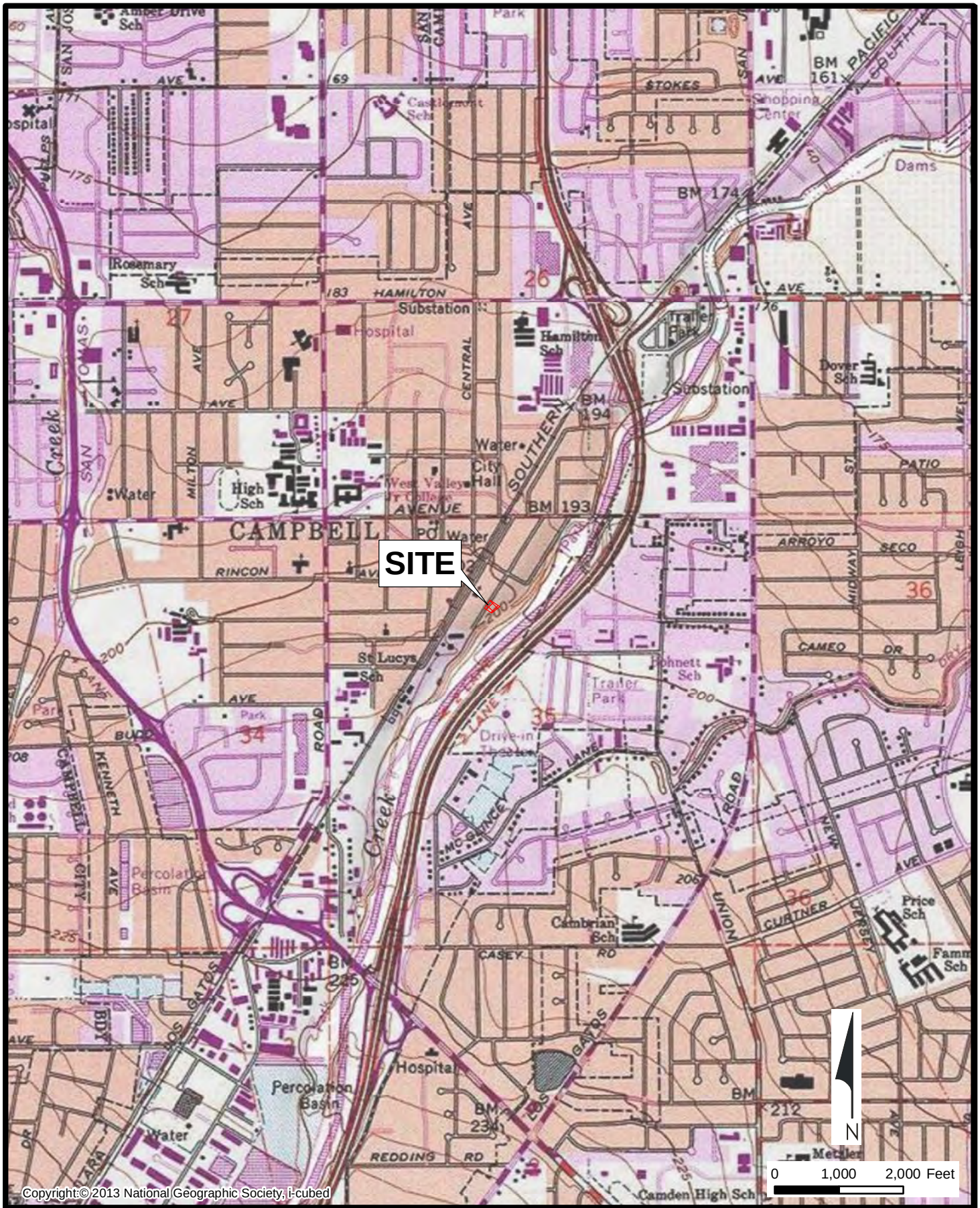
ft bgs = feet beneath ground surface
NA = not applicable
ND = not detected at or above the laboratory reporting limit shown
PCE = tetrachloroethene
RSL = regulatory screening level
VOC = volatile organic compound
USEPA = US Environmental Protection Agency

1. Soil gas screening values were calculated based on the DTSC-Modified (Cal/EPA 2014a) or USEPA RSLs (USEPA 2014) for residential and commercial as well as a default attenuation factor of 0.001 for future residential building and a default attenuation factor of 0.0005 for future commercial building

References:
California Environmental Protection Agency (Cal/EPA). 2014a. Human Health Risk Assessment (HHRA) Note Number 3, Issue: DTSC recommended methodology for use of U.S. EPA Regional Screening Levels (RSLs) in the Human Health Risk Assessment process at hazardous waste sites and permitted facilities. July.

USEPA. 2014. Regional Screening Levels for Chemical Contaminants at Superfund Sites. May.

Figures



ENVIRON

Site Location Map
240 and 250 Dillon Avenue
Campbell, California

Figure
1

Drafter:	RS	Date: 1/22/2015	Contract Number:	03-21676Z	Approved:	Revised:

Path: Q:\DRAWINGS\0321676z\0321676z-campbell-locmap.mxd

ENVIRON

Site Layout
240 and 250 Dillon Avenue
Campbell, California

Figure
2

Drafter: RS | Date: 1/23/2015 | Contract Number: 03-21676Z | Approved: | Revised:

Path: Q:\DRAWINGS\0321676z\0321676z-campbell-layout.mxd

ENVIRON

Sampling Location Map
240 and 250 Dillon Avenue
Campbell, California

Figure
3

Drafter: RS | Date: 1/23/2015 | Contract Number: 03-21676Z | Approved: | Revised:

Path: Q:\DRAWINGS\0321676z\0321676z-campbell-samploc.mxd

ATTACHMENT 4

"WILL SERVE" LETTERS (4)

WEST VALLEY
COLLECTION & RECYCLING, LLC.

To Whom it may concern,

West Valley is the exclusive Franchised Hauler for the City Of Campbell Commercial and residential. Premises in the city (280 Dillon Ave) shall be provided solid waste collection services at least once per week regardless of whether the premises are occupied and regardless of whether solid wastes are set out for collection.

Thank you,

Denay Dominguez

Customer Service Supervisor

1333 Oakland Road
San Jose CA 95112-9894
408.283.9250 phone
408.283.8509 fax
www.westvalleyrecycles.com

Printed on recycled paper

JULY 22, 2015

10900 N Blaney Ave.
Cupertino, CA 95014

Michael Enderby
ROBSON HOMES, LLC
2185 The Alameda, Suite 150,
San Jose, CA 95126

RE: Dillon Ave, Campbell

This letter has been created to satisfy your request of a Will Serve Letter to the referenced subdivision.

Pacific Gas and Electric will be designing and providing the requested utilities per the standard application process and under the correct Tariff rules set forth by the California Public Utilities Commission.

Application, contract, right-of-way, and moneys are due prior to construction. Be certain to keep in close contact with your PG&E Business Representative. This will insure that any changes or delays in your plans will not affect PG&E's ability to design and construct your service facilities in a manner that best meets your needs.

Please call if there are any questions.

Sincerely,

Esteban Macias, Senior New business Rep
PG&E Service Planning Department
E2M6@pge.com
408-725-3326

West Valley Sanitation District

July 9, 2015

Mike Enderby – Forward Planning Project Manager
Robson Homes
2185 The Alameda, Suite 150
San Jose, CA 95126

Re: Tract 10296 - 280 Dillon Avenue, Campbell – Will Serve

Dear Mr. Enderby:

This letter will serve as the West Valley Sanitation District's (District) "WILL SERVE" for the proposed 28 apartment and 90 townhome unit development at 280 Dillon Ave. in the City of Campbell.

The existing public sewers adjacent to the development include the 6-inch sewer along Dillon Ave. and the 6-inch sewer along Sam Cava Lane as shown in the attached map.

Pursuant to District Ordinance Code Section 10.130, the owner is required to pay all applicable fees prior to the recordation of the Final Map. The District will issue a clearance letter for the recording of the Final Map after the fees are paid.

Please contact me at (408) 385-3030 for any additional information.

Sincerely,

Alan Kam
Senior Civil Engineer
attachment

San Jose Water Company

1265 S. Bascom Ave.
San Jose, CA 95128-3514

Writer's Direct Line: (408) 279-7874
Email: jim.bariteau@sjwater.com

May 19, 2015

City of Campbell
Department of Public Works
70 North First Street
Campbell, CA 95008

Attention: Roger Storz

REFERENCE: Tract 10296
Dillon Avenue, Campbell
APN 412-08-030, 035, 037, 038, 041, 042, 043, 044 & 046

Gentlemen:

Please be informed that the above-referenced property is within the jurisdiction of the San Jose Water Company, and we will serve further development of this property in accordance with our rules and regulations in effect and on file with the California Public Utilities Commission.

This office has also reviewed the Final Tract Map, dated May 2015, prepared by Civil Engineering Associates. Based on that review, it appears that the proposed Public Service Easements (PSE) will be adequate for the installation of anticipated public water facilities. We have no objections to the recordation of the map, but reserve the right to require additional easements at a later date, if needed. Furthermore, we do not anticipate any conflicts occurring between any existing water line easements or rights (if there are any) and those resulting from the creation of this Tract Map.

If you have any questions or require further information, please contact this office at 408-279-7874.

Sincerely,

ORIGINAL SIGNED BY

James R. Bariteau
Senior Water Services Representative

JRB:bct
NB14-040(EsmtClr).doc

cc: Richard Yee, Robson Homes, LLC

Letter e-mailed & e-mailed to: Angela Ott w/Civil Engineering Associates

ATTACHMENT 5

DRAFT ENVIRONMENTAL NOISE FEASIBILITY STUDY

Dillon Avenue Townhomes

Campbell, California

Draft Environmental Noise Feasibility Study

2 June 2015

Prepared for:

Richard Yee
Santa Clara Development
2185 The Alameda
San Jose, CA 95126
Phone: 408.345.1767
Email: ryee@robsonhomes.com

Prepared by:

Charles M. Salter Associates, Inc.
Valerie Smith, PE
Alexander Salter, PE
130 Sutter Street, Floor 5
San Francisco, CA 94104
Phone: 415.397.0442
Fax: 415.397.0454
Email: alexander.salter@cmsalter.com

CSA Project Number: 13-0165

PROJECT DESCRIPTION

This report provides an environmental noise feasibility study for the proposed residential development at 230 and 280 Dillon Avenue in Campbell, California. The purpose of the study is to determine the noise environment at the site, compare the measured data with the applicable City and State standards, and propose mitigation measures as necessary. This report summarizes the results of our study.

The project site is located in the City of Campbell, situated between Dillon Avenue and the Highway 17 corridor. The project site is bounded by commercial uses to the north, a public works facility for the City to the south, and a pedestrian trail to the east. The major noise sources affecting the project site are vehicular traffic along Highway 17 and Dillon Avenue. Noise from the public works facility is also a contributor, though we understand that this facility is typically only operational between 7 a.m. and 4 p.m. The project consists of two portions: the two apartment buildings and the eighteen townhouse buildings. This report addresses environmental noise at the townhouse buildings.

In summary, interior noise levels would be reduced to meet City and State standards by incorporating sound-rated assemblies at exterior building facades. Appendix A and Figure A1 contain more information about the fundamental concepts of environmental noise.

PROJECT CRITERIA

State of California – California Building Code (CBC)

The 2013 California Building Code (CBC) does not currently include an exterior noise intrusion criterion. However, the CBC has historically required that the indoor noise level in residential units of new multi-family dwellings not exceed DNL[1] 45 dB where the exterior noise level is greater than DNL 60 dB. This criterion is our recommended goal.

City of Campbell, California – Noise Element of 2001 General Plan

The City of Campbell's interior noise standard is consistent with the historic State requirement for multi-family housing of CNEL[2] 45 dB. According to the noise guidelines in the general plan:

"New residential development shall conform to a traffic-related noise exposure of 60 dBA CNEL for outdoor noise in noise-sensitive outdoor activity areas and 45 dBA CNEL for indoor noise."

Noise-sensitive outdoor activity areas are typically considered rear yards, common-use courtyards, etc. For this project, we have applied this requirement to the two common open spaces at the site.

---

1 Day-Night Average Sound Level (DNL) – A descriptor established by the U.S. Environmental Protection Agency to describe the average day-night level with a penalty applied to noise occurring during the nighttime hours (10 pm to 7 am) to account for the increased sensitivity of people during sleeping hours.

2 Community Noise Equivalent Level (CNEL) – A descriptor for the 24-hour A-weighted average noise level. The CNEL concept accounts for the increased acoustical sensitivity of people to noise during the evening and nighttime hours. Sound levels during the hours from 7 pm to 10 pm are penalized 5 dB; sound levels during the hours from 10 pm to 7 am are penalized 10 dB. A 10-dB increase in sound level is perceived by people to be a doubling of loudness. This is approximately equal to the DNL.

NOISE ENVIRONMENT

To quantify the existing noise environment at the project site, we conducted noise measurements at the site between 22 March and 28 March 2013. We returned to the site to conduct additional noise measurements between 8 April and 12 April 2014. We placed noise monitors at five long-term continuous locations (L1 to L5), as well as two 15-minute spot locations (S1 and S2). A summary of the acoustical measurement locations is listed below in Table 2, and Figure 1.

Table 1: On-Site Measured Data

Monitor	Location	Measured CNEL
L1	Approximately 20-feet southeast of Dillon Avenue and approximately 375-feet southwest of Sam Cava Lane, 12-feet above grade	64 dB
L2	Approximately 230-feet southeast of Dillon Avenue and approximately 430-feet north of Highway 17, 12-feet above grade	70 dB
L3	Approximately 355-feet north of Highway 17 and approximately 335-feet southeast of Dillon Avenue, 12-feet above grade	71 dB
L4	Approximately 20-feet south of Sam Cava Lane and approximately 180-feet east of Dillon Avenue, 12-feet above grade	64 dB
L5	Approximately 220-feet southeast of Sam Cava Lane and approximately 325-feet north of Highway 17, 12-feet above grade	71 dB
S1	Approximately 200-feet southeast of Dillon Avenue and approximately 500-feet north of Highway 17, 5-feet above grade	63 dB*
S2	Approximately 330-feet southeast of Dillon Avenue and approximately 410-feet north of Highway 17, 5-feet above grade	65 dB*

* Calculated using a 15-minute offset from Monitor L3

A traffic study has not been provided for this project. For our calculations, we have added 1 decibel to the expected CNEL to account for future traffic increases[3].

ASSESSMENT OF NOISE LEVELS

Exterior Noise Levels

We calculated noise levels of CNEL 60 to 72 dB across the site. We understand that there will be two designated outdoor-use spaces for the project: one located adjacent to Building 6, and one located between Buildings 2 and 3. The location of these outdoor-use spaces is shown on Figure 2.

At the Building 2 outdoor-use space, the noise level will be approximately CNEL 60 dB. This open space meets the City's recommended CNEL criteria without mitigation.

---

[3] Caltrans assumes a traffic volume increase of three-percent per year, which corresponds to a 1 dB increase over ten years. In the absence of City data, we have used this same formula for the local roads.

At the Building 6 outdoor-use space, the noise level will be approximately 66 dB. In order to reduce the noise levels at this common open space down to the City's recommended CNEL 60 dB, a 7-foot sound barrier would need to be installed between Buildings 12 and 13, as shown in Figure 2. This assumes the elevation of the bottom of the sound wall is the same as the elevation of the common open space.

We have shown the sound barrier as two barriers that overlap. The overlap would need to be enough to block line-of-sight to the outdoor-use area (plus one additional foot). In this configuration, the face of the barrier would need to be sound absorptive in the area of the overlap. This could be achieved with an exterior acoustical plaster such as Pyrok Acoustement 40.

The fence must be continuous from grade to top, have no cracks or gaps, and have a minimum surface density of three pounds per square foot (e.g., one-inch thick plywood, CMU, etc.).

Interior Noise Levels

To allow the project to meet the City's interior noise requirement of CNEL 45 dB in habitable rooms, sound-rated assemblies will be required at all building facades of the project site. The STC[4] ratings for the project site vary between STC 28 and 35, depending on the exposure to nearby noise sources.

Figure 3 shows the STC ratings necessary to meet the project criteria. The STC ratings are based on the site plan, floorplans, and elevations dated 10 April and 12 May 2015. Detailed floorplans and elevations were not provided for every building, but we have assumed that they are consistent throughout the project.

STC ratings for selected assemblies should be based on laboratory testing performed in accordance with ASTM E-90 and comprise the entire window or door assembly, including the frame. For reference purposes, a typical construction-grade 1-inch insulated, dual-pane window achieves an STC rating of approximately 28 to 30. A qualified acoustical engineer must review the design as it is developed to refine the specific STC ratings once the building design and site layout has been refined.

Because windows must be closed to achieve the interior noise criterion, an alternate means of providing outside air (e.g., HVAC, Z-ducts) to habitable spaces should be considered for all building facades exposed to an exterior DNL of 60 dB or greater. This applies to all residences on the project site.

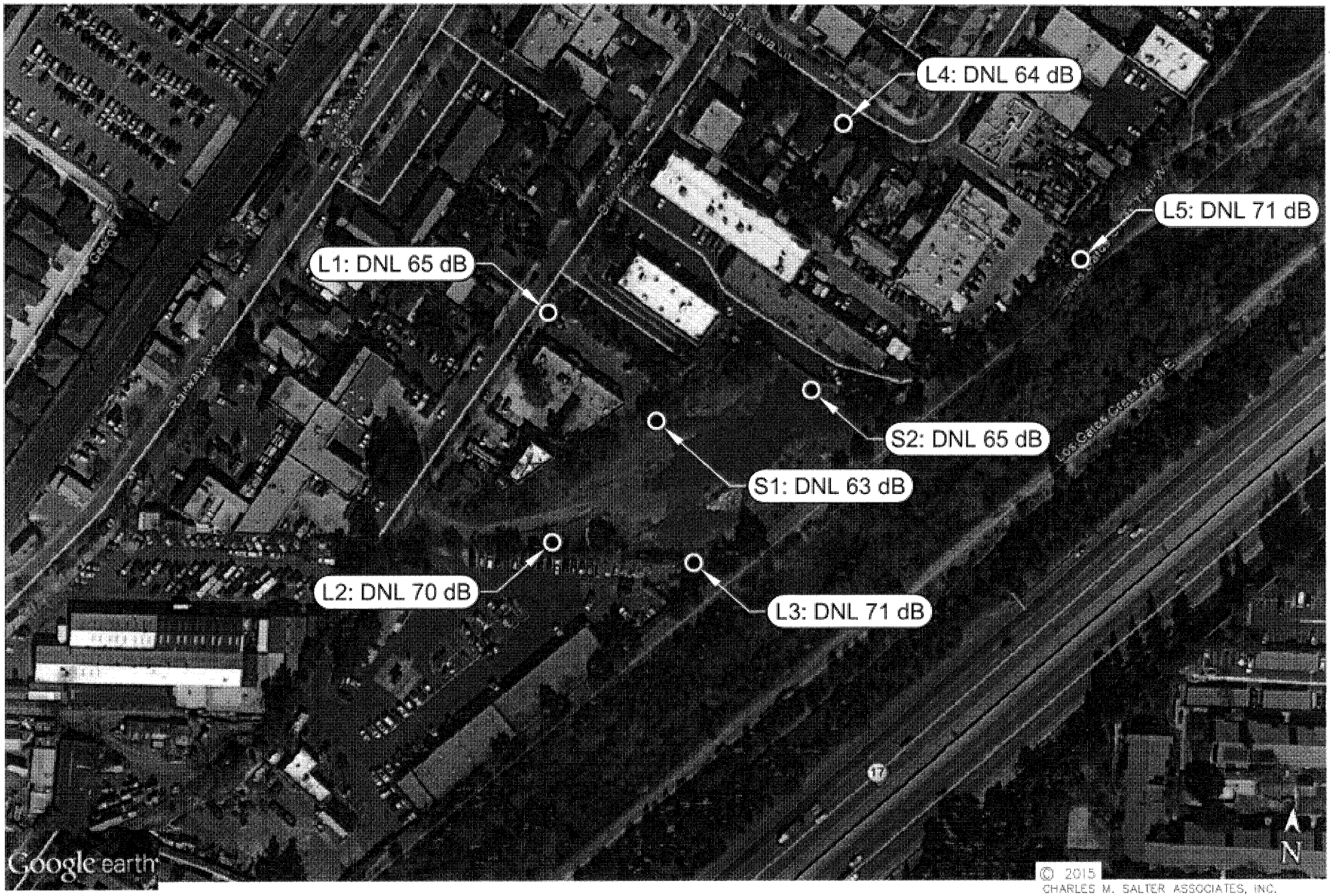
* * *

This concludes our draft environmental noise feasibility study for the Dillon residences. Should you have any questions, please give us a call.

---

4 Sound Transmission Class (STC) – A single-figure rating standardized by ASTM and used to rate the sound insulation properties of building partitions. The STC rating is derived from laboratory measurements of a particular building element and as such is representative of the maximum sound insulation. Increasing STC ratings correspond to improved noise isolation.

Charles M Salter Associates Inc 130 Sutter Street San Francisco California 94104 Tel. 415 397 0442 Fax. 415 397 0454



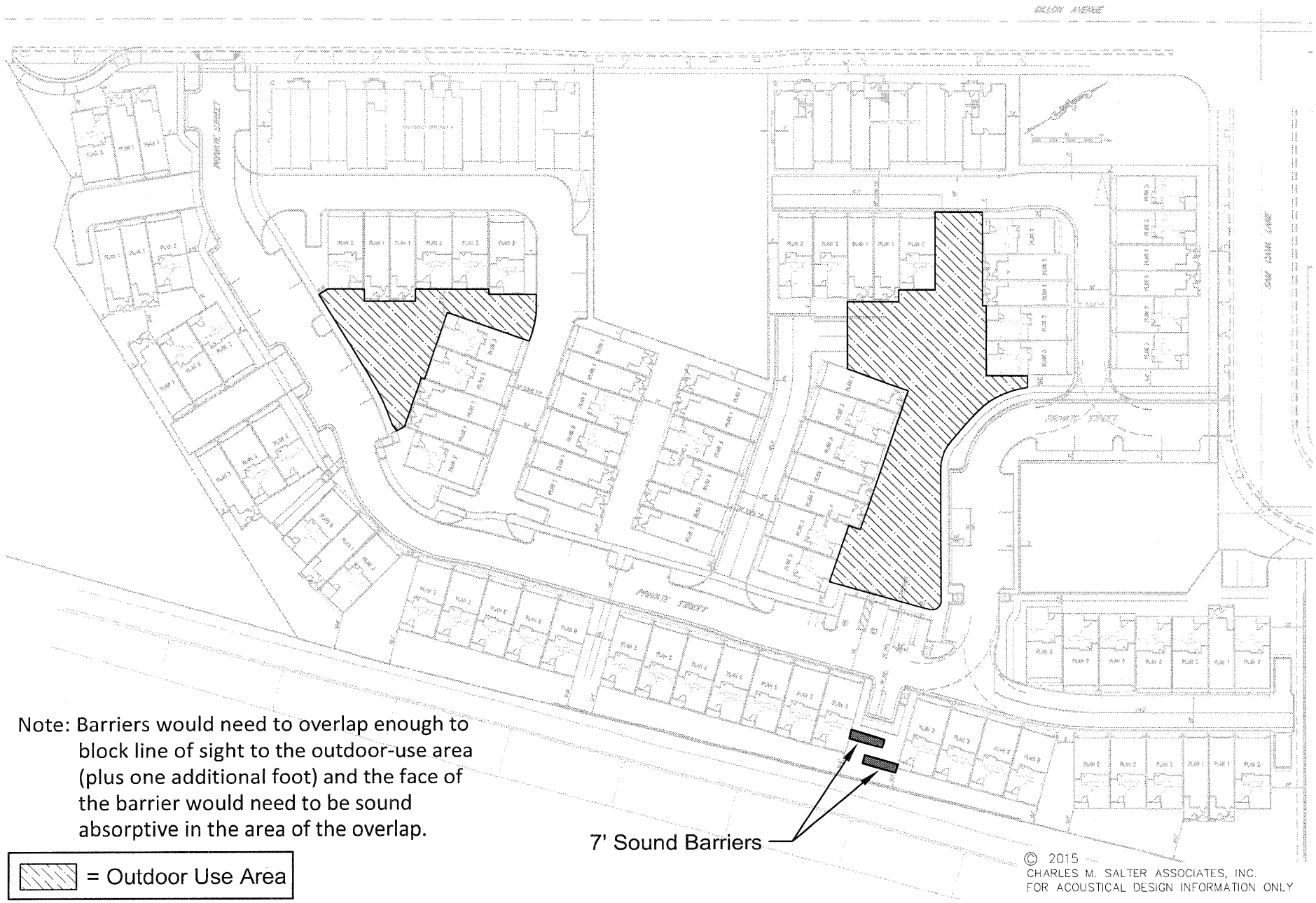
DILLON AVENUE – CAMPBELL, CA.
MEASUREMENT LOCATIONS AND MEASURED DNL

FIGURE 1

CSA # 13-0165

VCS/AKS 05.22.15

Charles M Salter Associates Inc 130 Sutter Street San Francisco California 94104 Tel: 415 397 0442 Fax: 415 397 0454

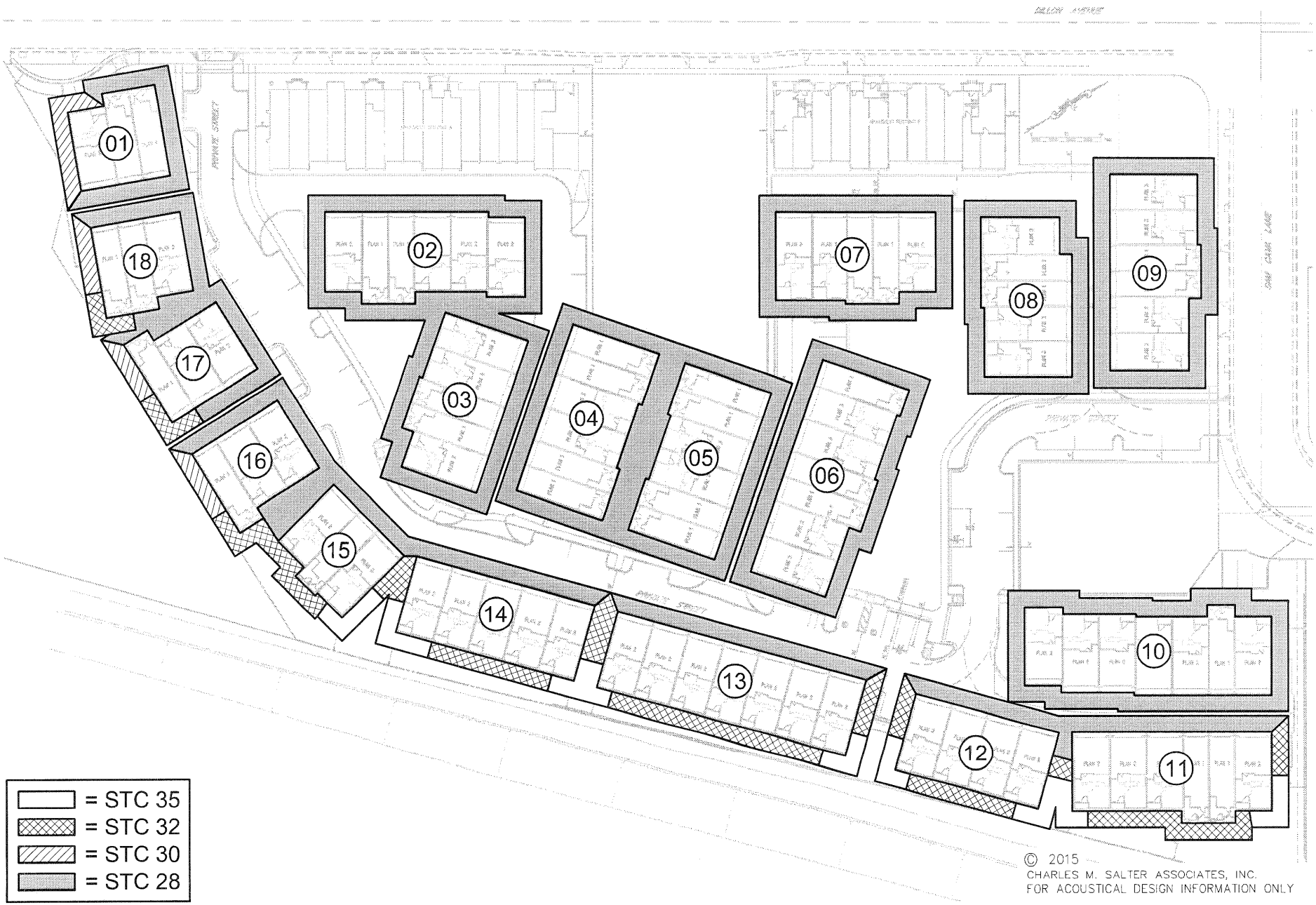


DILLON AVENUE – CAMPBELL, CA.
OUTDOOR USE AREAS AND SOUND BARRIER LOCATIONS AND HEIGHTS

FIGURE 2

CSA #	VCS/AKS
13-0165	05.28.15

Charles M Salter Associates Inc 130 Sutter Street San Francisco California 94104 Tel: 415 397 0442 Fax: 415 397 0454



DILLON AVENUE – CAMPBELL, CA.
MINIMUM RECOMMENDED STC RATINGS FOR WINDOWS AND EXTERIOR DOORS

FIGURE 3

CSA # 13-0165

VCS/AKS 05.28.15

APPENDIX A

FUNDAMENTAL CONCEPTS OF ENVIRONMENTAL NOISE

This section provides background information to aid in understanding the technical aspects of this report.

Three dimensions of environmental noise are important in determining subjective response. These are:

- The intensity or level of the sound
- The frequency spectrum of the sound
- The time-varying character of the sound

Airborne sound is a rapid fluctuation of air pressure above and below atmospheric pressure. Sound levels are usually measured and expressed in decibels (dB), with 0 dB corresponding roughly to the threshold of hearing.

The "frequency" of a sound refers to the number of complete pressure fluctuations per second in the sound. The unit of measurement is the cycle per second (cps) or hertz (Hz). Most of the sounds, which we hear in the environment, do not consist of a single frequency, but of a broad band of frequencies, differing in level. The name of the frequency and level content of a sound is its sound spectrum. A sound spectrum for engineering purposes is typically described in terms of octave bands, which separate the audible frequency range (for human beings, from about 20 to 20,000 Hz) into ten segments.

Many rating methods have been devised to permit comparisons of sounds having quite different spectra. Surprisingly, the simplest method correlates with human response practically as well as the more complex methods. This method consists of evaluating all of the frequencies of a sound in accordance with a weighting that progressively de-emphasizes the importance of frequency components below 1000 Hz and above 5000 Hz. This frequency weighting reflects the fact that human hearing is less sensitive at low frequencies and at extreme high frequencies relative to the mid-range.

The weighting system described above is called "A"-weighting, and the level so measured is called the "A-weighted sound level" or "A-weighted noise level." The unit of A-weighted sound level is sometimes abbreviated "dBA." In practice, the sound level is conveniently measured using a sound level meter that includes an electrical filter corresponding to the A-weighting characteristic. All U.S. and international standard sound level meters include such a filter. Typical sound levels found in the environment and in industry are shown in Figure A-1.

Although a single sound level value may adequately describe environmental noise at any instant in time, community noise levels vary continuously. Most environmental noise is a conglomeration of distant noise sources, which results in a relatively steady background noise having no identifiable source. These distant sources may include traffic, wind in trees, industrial activities, etc. and are relatively constant from moment to moment. As natural forces change or as human activity follows its daily cycle, the sound level may vary slowly from hour to hour. Superimposed on this slowly varying background is a succession of identifiable noisy events of brief duration. These may include nearby activities such as single vehicle pass-bys, aircraft flyovers, etc. which cause the environmental noise level to vary from instant to instant.

To describe the time-varying character of environmental noise, statistical noise descriptors were developed. "L10" is the A-weighted sound level equaled or exceeded during 10 percent of a stated time

period. The L10 is considered a good measure of the maximum sound levels caused by discrete noise events. "L50" is the A-weighted sound level that is equaled or exceeded 50 percent of a stated time period; it represents the median sound level. The "L90" is the A-weighted sound level equaled or exceeded during 90 percent of a stated time period and is used to describe the background noise.

As it is often cumbersome to quantify the noise environment with a set of statistical descriptors, a single number called the average sound level or "Leq" is now widely used. The term "Leq" originated from the concept of a so-called equivalent sound level which contains the same acoustical energy as a varying sound level during the same time period. In simple but accurate technical language, the Leq is the average A-weighted sound level in a stated time period. The Leq is particularly useful in describing the subjective change in an environment where the source of noise remains the same but there is change in the level of activity. Widening roads and/or increasing traffic are examples of this kind of situation.

In determining the daily measure of environmental noise, it is important to account for the different response of people to daytime and nighttime noise. During the nighttime, exterior background noise levels are generally lower than in the daytime; however, most household noise also decreases at night, thus exterior noise intrusions again become noticeable. Further, most people trying to sleep at night are more sensitive to noise. To account for human sensitivity to nighttime noise levels, a special descriptor was developed. The descriptor is called the Ldn (Day/Night Average Sound Level), which represents the 24-hour average sound level with a penalty for noise occurring at night. The Ldn computation divides the 24-hour day into two periods: daytime (7:00 am to 10:00 pm); and nighttime (10:00 pm to 7:00 am). The nighttime sound levels are assigned a 10 dB penalty prior to averaging with daytime hourly sound levels.

For highway noise environments, the average noise level during the peak hour traffic volume is approximately equal to the Ldn.

The effects of noise on people can be listed in three general categories:

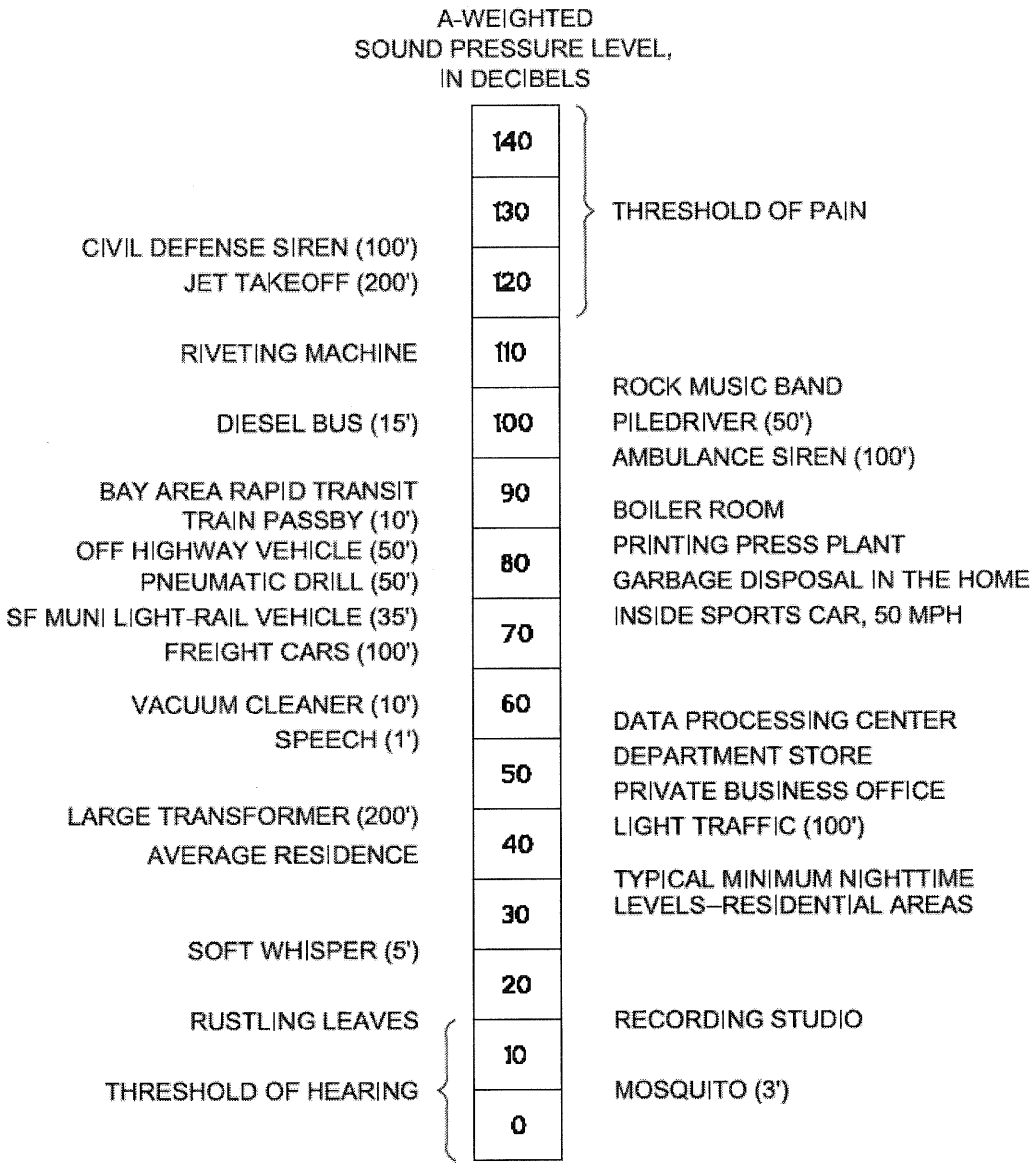
- Subjective effects of annoyance, nuisance, dissatisfaction
- Interference with activities such as speech, sleep, and learning
- Physiological effects such as startle, hearing loss

The sound levels associated with environmental noise usually produce effects only in the first two categories. Unfortunately, there has never been a completely predictable measure for the subjective effects of noise nor of the corresponding reactions of annoyance and dissatisfaction. This is primarily because of the wide variation in individual thresholds of annoyance and habituation to noise over time.

Thus, an important factor in assessing a person's subjective reaction is to compare the new noise environment to the existing noise environment. In general, the more a new noise exceeds the existing, the less acceptable the new noise will be judged.

With regard to increases in noise level, knowledge of the following relationships will be helpful in understanding the quantitative sections of this report:

Except in carefully controlled laboratory experiments, a change of only 1 dB in sound level cannot be perceived. Outside of the laboratory, a 3 dB change is considered a just-noticeable difference. A change in level of at least 5 dB is required before any noticeable change in community response would be expected. A 10 dB change is subjectively heard as approximately a doubling in loudness, and would almost certainly cause an adverse community response.



(100') = DISTANCE IN FEET BETWEEN SOURCE AND LISTENER

TYPICAL SOUND LEVELS MEASURED IN THE ENVIRONMENT AND INDUSTRY

FIGURE A1

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