Final Environmental Impact Report

Edgewood Plaza Project

Palo Alto File No. 08PLN-00157/10PLN-00198
State Clearinghouse No. 2011022030

City of Palo Alto
February 2012

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SECTION 1.0 OVERVIEW AND PURPOSE OF THE FINAL EIR

This document, together with the Draft Environmental Impact Report (DEIR), constitutes the Final Environmental Impact Report (FEIR) for the proposed *Edgewood Plaza Project* in Palo Alto, California. Under the California Environmental Quality Act (CEQA), the Lead Agency is required, after completion of a Draft EIR, to consult with and obtain comments from public agencies having jurisdiction by law with respect to the proposed project, and to provide the general public with an opportunity to comment on the Draft EIR. The City of Palo Alto, as the Lead Agency, is then required to respond to significant environmental issues raised in the review and consultation process, as described in CEQA Section 15132.

The DEIR was circulated to affected public agencies and interested parties for a 45-day review period. Comments on the Draft EIR were to be received in writing by no later than November 14, 2011.

1.1 FORMAT OF THE FINAL EIR

This document, which includes responses to comments and text revisions, has been prepared in accordance with Section 15088 of the CEQA Guidelines. In addition to Section 1.0, describing an overview of the purpose and format of the Final EIR, the Final EIR includes the following sections:

Section 2.0 **List of Agencies and Individuals Receiving the Draft EIR**
The agencies, organizations, and individuals who received copies of the Draft EIR are listed in this section. The locations where the Draft EIR could be reviewed during the public circulation period are also included in this section.

Section 3.0 **List of Agencies and Individuals Commenting on the Draft EIR**
This section contains a list of all parties who submitted written comments on the Draft EIR.

Section 4.0 **Written Comments on the Draft EIR and Responses**
This section contains the written comments received on the Draft EIR and the responses to those comments.

Section 5.0 **Verbal Comments on the Draft EIR and Responses**
This section contains a transcript of the comments received on the Draft EIR at the City of Palo Alto Planning and Transportation Commission Meeting on October 26, 2011, and responses to those comments.

Section 6.0 **Revisions to the Text of the Draft EIR**
Section 6.0 contains text revisions to the Draft EIR. Text revisions can be made as a result of comments received during the Draft EIR public review process, corrections or clarifications to the text, or to reflect modifications that have been made to the project to reduce impacts.

1.2 PURPOSE OF THE FINAL EIR

In conformance with the CEQA Guidelines (Section 15151), EIRs should be prepared with a sufficient degree of analysis to provide decisions-makers with information which enables them to make a decision on the project that takes into account environmental consequences. The Final EIR also is required to examine mitigation measures and alternatives to the project intended to reduce or eliminate significant environmental impacts.

The FEIR is used by the City and other Responsible Agencies in making decisions regarding the project. The CEQA Guidelines require that, while the information in the FEIR does not control the agency's ultimate discretion on the project, the agency must respond to each significant effect identified in the DEIR by making written findings for each of those effects. According to the State Public Resources Code (Section 21081), no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless both of the following occur:

(a) The public agency makes one or more of the following findings with respect to each significant effect:

(1) Changes or alterations have been required in, or incorporated into, the project which will mitigate or avoid the significant effects on the environment.

(2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

(3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities of highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

(b) With respect to significant effects which were subject to a finding under paragraph (3) of subdivision (a), the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment.

All documents referenced in this EIR are available for public review in the City of Palo Alto's Development Center, 285 Hamilton Avenue, Palo Alto, during business hours, Monday, Tuesday, Thursday and Friday, 8:00 a.m. to 12:00 p.m. and 1:00 p.m. to 4:00 p.m.; Wednesdays 1:00 p.m. to 4:00 p.m.

The Final EIR will also be available for review on the City's website, http://www.cityofpaloalto.org, and at the following public libraries: Palo Alto Main Library, 1213 Newell Rd., Palo Alto, CA 94303, and Palo Alto Downtown Library, 270 Forest Ave., Palo Alto, CA 94301. In accordance with the CEQA Guidelines, the FEIR will be made available to the public a minimum of ten days prior to the EIR certification hearing.

SECTION 2.0 LIST OF AGENCIES, ORGANIZATIONS, AND INDIVIDUALS RECEIVING THE DRAFT EIR OR NOTICE OF AVAILABILITY

State Agencies

California Department of Conservation
California Department of Fish and Game, Region 3
California Department of Parks and Recreation
California Department of Toxic Substances Control
California Department of Transportation, District 4
California Department of Water Resources
California Highway Patrol
California Native American Heritage Commission
California Resources Agency
California State Clearinghouse
Regional Water Quality Control Board, Region 2

Local Agencies

Santa Clara County Department of Environmental Health
Santa Clara Valley Transportation Authority (VTA)
City of East Palo Alto

Additional individuals and groups were notified of the availability of the Draft EIR by email and postal mail, and the Draft EIR has been posted on the City's website and in the Palo Alto Main and Downtown Libraries.

SECTION 3.0 LIST OF AGENCIES, ORGANIZATIONS, AND INDIVIDUALS COMMENTING ON THE DRAFT EIR

Presented below is a list of agencies, organizations, and individuals commenting on the Draft EIR. The table below also identifies the date of the letter received, and whether the comment submitted requires substantive responses in the Final EIR. Comments that raise questions regarding the adequacy of the EIR or analyses in the EIR require substantive responses. Comments that contain only opinions regarding the proposed project do not require substantive responses in the FEIR. Complete copies of all the letters are included in *Section 4.0* of this Final EIR.

	Comment Received From	Date of Letter	Response Required	Response on Page
State Agencies				
A.	California State Clearinghouse	November 15, 2011	No	9
B.	California Department of Toxic Substances Control (DTSC)	October 31, 2011	Yes	13
C.	California Department of Transportation	November 4, 2011	Yes	15
Local Agencies				
D.	County of Santa Clara, Department of Environmental Health	October 5, 2011	No	18
E.	Santa Clara Valley Transportation Authority	November 14, 2011	Yes	21
Organizations, Businesses, and Individuals				
F.	Jeff Levinsky	October 17, 2011	Yes	25
G.	Heather Rosmarin	October 26, 2011	Yes	31
H.	Page & Turnbull	October 27, 2011	Yes	36
I.	Eduardo Martinez, Chair, PTC	November 1, 2011	Yes	38
J.	Alan Sonneman	November 12, 2011	Yes	41
K.	Gary Marshall	November 14, 2011	Yes	44
L.	Woodland Creek Homeowners Association	November 14, 2011	Yes	50
M.	Karen Holman, City Council Member	November 28, 2011	Yes	58

Verbal Comments, Planning and Transportation Commission Meeting, October 26, 2011

Comments were received from the City of Palo Alto Planning and Transportation Commission and the public during the public circulation period. Members of the public who provided comments at the public meeting are listed below. Responses to verbal comments start on Page 94.

1. Commissioner Lippert
2. Jeff Levinsky
3. Beth Bunnenberg
4. Robert Moss
5. Adena Rosmarin
6. Jon Foster
7. Herb Borock
8. Vice-Chair Garber
9. Commissioner Tuma
10. Commissioner Lippert
11. Commissioner Tanaka
12. Chair Martinez
13. Chair Martinez
14. Vice-Chair Garber
15. Commissioner Tuma
16. Commissioner Tanaka
17. Commissioner Lippert
18. Chair Martinez
19. Vice-Chair Garber
20. Chair Martinez
21. Commissioner Tanaka

SECTION 4.0 RESPONSES TO WRITTEN COMMENTS RECEIVED ON THE DRAFT EIR

The following section includes all of the comments requiring responses contained in letters received during the advertised 45-day review period by the City of Palo Alto regarding the Draft EIR. The comments are organized under headings containing the source of the letter and its date.

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

November 15, 2011

Elena Lee
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA 94301

Subject: Edgewood Plaza
SCH#: 2011022030

Dear Elena Lee:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on November 14, 2011, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

A-1

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

RECEIVED
NOV 17 2011
By

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

State Clearinghouse Data Base

SCH# 2011022030
Project Title Edgewood Plaza
Lead Agency Palo Alto, City of

Type EIR Draft EIR

Description Built in 1956-8, Edgewood Plaza is the only shopping center designed by Eichler Homes, Inc., and appears to be a significant historic resource. The proposed project would allow the redevelopment of Edgewood Plaza, including relocation of one of the three existing buildings on the site an renovation of the two to remain in place for continued retail use, including a grocery store. The project also includes the construction of ten, two-story single-family residences and a 0.24 acre public park. Adoption of a new Planned Community Zone, detailing the mix of uses, setbacks, building height, access, and other development criteria is proposed for the mixed-use project.

Lead Agency Contact

Name Elena Lee
Agency City of Palo Alto
Phone 650 617 3196 **Fax**
email
Address 250 Hamilton Avenue
City Palo Alto **State** CA **Zip** 94301

Project Location

County Santa Clara
City Palo Alto
Region
Lat / Long 37° 26' 53" N / 122° 07' 32" W
Cross Streets 2080 Channing Avenue, near St. Francis Drive and West Bayshore Road
Parcel No. 003-18-021 and 003-18-023
Township 5S **Range** 2W **Section** **Base** MDM&M

Proximity to:

Highways US 101, SR 82
Airports Palo Alto Airport
Railways UPRR/Caltrain
Waterways San Francisco Creek, San Franciso Bay
Schools Duveneck Elementary
Land Use Comprehensive Plan: Neighborhood Commercial, Zoning: Planned Community District (PC 1643)

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 3; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 09/30/2011 **Start of Review** 09/30/2011 **End of Review** 11/14/2011

Note: Blanks in data fields result from insufficient information provided by lead agency.

A. RESPONSE TO COMMENT LETTER A FROM THE CALIFORNIA STATE CLEARINGHOUSE, DATED NOVEMBER 15, 2011.

Response to Comment A-1:

No response is required.

Department of Toxic Substances Control

Deborah O. Raphael, Director
700 Heinz Avenue
Berkeley, California 94710-2721

Matthew Rodriquez
Secretary for
Environmental Protection

Edmund G. Brown Jr.
Governor

October 31, 2011

Ms. Elena Lee
City of Palo Alto
Department of Planning and Community Environment
250 Hamilton Avenue, 5th Floor
Palo Alto, California 94301

Dear Ms. Lee:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Edgewood Plaza Project (SCH#2011022030). As you may be aware, the California Department of Toxic Substances Control (DTSC) oversees the cleanup of sites where hazardous substances have been released pursuant to the California Health and Safety Code, Division 20, Chapter 6.8. As a potential responsible agency, DTSC is submitting comments to ensure that the California Environmental Quality Act (CEQA) documentation prepared for this project adequately addresses any remediation activities which may be required to address hazardous substances releases.

Reports appended to the DEIR and other associated reports provided to DTSC by the City of Palo Alto indicate that various dry cleaning businesses operated at the Edgewood Plaza over the years, including Edgewood Plaza Cleaners and Moon's Cleaners. The associated reports indicate that several tenant spaces were used for dry cleaning operations at Edgewood Plaza, including 2050 and 2109 Channing Avenue and 2125 Saint Francis Drive. Several subsurface investigations were conducted to investigate the potential groundwater impact caused by the dry cleaning operations at the project site. The conclusion of the investigations was that the dry cleaning operations have not significantly impacted groundwater and that the apparent extent of the volatile organic compound contamination is limited.

B-1

The previous subsurface investigations did not include collection of groundwater samples from beneath or in the immediate vicinities of the former dry cleaner units, nor did they identify the locations of the dry cleaning equipment or solvent storage areas. Shallow groundwater samples were collected at the project site more than 50 to 60 feet away from the nearest former dry cleaner tenant space.

Typically, the highest contaminant concentrations at dry cleaner sites are beneath the dry cleaner tenant space and/or the dry cleaning equipment. Without groundwater sampling in the areas around the former dry cleaner units, there appears to be insufficient sampling data to conclude that the groundwater impact from the dry cleaners is not potentially significant. Additional groundwater sampling targeting potential solvent releases in the area of each dry cleaner unit should be considered to more fully characterize the project site. **B-1**

The previous subsurface investigations did not include soil gas sampling. Because of the highly volatile nature of PCE and other volatile organic compounds (VOCs) that result from biological degradation of PCE, they can easily volatilize from the soil and groundwater and migrate into the indoor air of overlying buildings. A soil gas sampling survey investigating the current building locations, the proposed relocation site for Building 1, and the future location of the planned residential development should be considered. If PCE and/or other VOCs are detected in soil vapor, the human health risks from potential exposure in indoor air should be evaluated. DTSC has documents that provide guidance on soil gas sampling and evaluating the risk of soil gas intrusion into the indoor air. This guidance can be found on the DTSC Web site at the following address: **B-2**

http://www.dtsc.ca.gov/SiteCleanup/Vapor_Intrusion.cfm#Vapor_Intrusion_Guidance_Documents

The results of any further sampling and evaluations addressing hazardous substances releases should be summarized in the EIR. If hazardous substances have been released, they will need to be addressed as part of this project. Any remediation activities that are to be implemented as part of the project should be discussed in the EIR along with the cleanup levels that will be applied and the anticipated regulatory agency oversight. Potential impacts associated with the remediation activities should be addressed by the EIR. If the remediation activities include soil excavation, the EIR should include: (1) an assessment of air impacts and health impacts associated with the excavation activities; (2) identification of any applicable local standards which may be exceeded by the excavation activities, including dust and noise levels; (3) transportation impacts from the removal or remedial activities; and (4) risk of upset should be there an accident during cleanup. **B-3**

DTSC can assist in overseeing characterization and cleanup activities through our Voluntary Cleanup Program. We are aware that projects such as this one are typically on a compressed schedule, and in an effort to use the available review time efficiently, we request that DTSC be included in any meetings where issues relevant to our statutory authority are discussed. Please contact Xavier Bryant at (510) 540-3835 if you have any questions or would like to schedule a meeting.

B-3

Sincerely,

Xavier Bryant, Project Manager
Brownfields and Environmental Restoration Program
Berkeley Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Kathie Schievelbein
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

B. RESPONSE TO COMMENT LETTER B FROM THE CALIFORNIA DEPARTMENT OF TOXIC SUBSTANCE CONTROL (DTSC), DATED OCTOBER 31, 2011.

Response to Comment B-1:

The comment is acknowledged. Groundwater sampling on the west parcel of the project site was completed in December 2005, as described in the sampling report completed in January 2006 and attached to Appendix J of the Initial Study (AllWest Environmental, Inc. *Subsurface Investigation Report, Edgewood Plaza, 2103-2125 Saint Francis Drive, Palo Alto, California, 94303.* January 13, 2006.). The maps of the sampling locations for this study have been provided to DTSC, and are attached to this Final EIR in Revised Appendix J of the Initial Study.

Groundwater samples were collected at eight locations on the west parcel, in close proximity to the former dry cleaners on the site. Dry cleaning equipment was removed from the former Moon's Cleaners in approximately 1998, and groundwater samples were not obtained from inside the building. Between the subsurface investigations completed for the east and west parcels, 17 groundwater samples were collected, of which only one showed any levels of contamination above Environmental Screening Levels (ESLs).[1]

Response to Comment B-2:

Following receipt of this comment by DTSC by the City; City staff, the applicant, and their hazardous materials consultant conferred in November 2011 with DTSC staff regarding the possible scope of soil gas sampling. To further characterize the extent of hazardous materials contamination, and in response to DTSC's comment, soil vapor testing was completed in December 2011, with follow-up testing completed in January 2012 (new Initial Study Appendix P, in *Section 6.0* of this document).

Seven soil borings were completed in November 2011, and an additional eight soil borings were completed in January 2012 to depths of five feet below ground surface to characterize potential soil vapor intrusion conditions at the site. The samples were collected within the former Moon's cleaners and in several parking lot areas nearby (Appendix P, Figure 2). The samples were analyzed for volatile organic compounds (VOCs), including tetrachloroethene (PCE) and its breakdown products, a solvent used in dry-cleaning.

Only one sample near the former Moon's cleaners (SVP-1) was found to have levels of PCE exceeding the applicable commercial/industrial ESLs and CHHSLs.[2] These results indicate a potential for indoor vapor intrusion impact within the former Moon's Cleaners and other vacant building tenant spaces in Building 1 (2121, 2125 and 2129 Saint Francis Drive). Since PCE was not detected in soil vapor samples collected within tenant spaces in Building 2 (2050 Channing Avenue and 2103 through 2109 Saint Francis Drive), no potential for an indoor vapor intrusion impact by PCE soil vapor was found at that building. Since the PCE detected in the soil vapor sample (SVP-15) located adjacent to the grocery building (2080 Channing Avenue) was below the applicable

[1] Environmental Screening Levels (ESLs) of the San Francisco Bay Regional Water Quality Board (RWQCB) are used to determine if the presence of these substances represents a significant threat to human health or the environment. The California Human Health Screening Levels (CHHSLs) are concentrations of 54 hazardous chemicals in soil or soil gas that the California Environmental Protection Agency (Cal/EPA) considers to be below thresholds of concern for risks to human health.

[2] Sample SVP-1 showed a result of 17,000 micrograms per cubic meter (or $\mu g/m^3$) compared to an ESL for PCE of 1,400 $\mu g/m^3$ and a CHHSL for PCE of 600 $\mu g/m^3$ for commercial/industrial land uses.

commercial/industrial ESL and CHHSL, no potentially significant indoor vapor intrusion impact by PCE soil vapor would be expected at that building.

Under the proposed project, Building 1 would be relocated to a new location immediately to the west during redevelopment of the project site, and the existing building location would then be used as a part of the retail parking lot. Since PCE concentrations in soil vapor samples from three probes (SVP-8, SVP-9 and SVP-10) that would be located within the proposed new building footprint did not exceed applicable ESLs or CHHSLs, no potentially significant indoor vapor intrusion impact by PCE soil vapor would be anticipated for the relocated Building 1 following site redevelopment.

Response to Comment B-3:

As noted in the Response to Comment B-2, above, the results of further sampling have been provided in Initial Study Appendix P in *Section 6.0* of this EIR. The EIR also has been revised to clarify the hazardous materials mitigation measures for handling soil at the site. Please see the text revisions to page 68 of the Text of the Initial Study (Appendix C of the Draft EIR) in *Section 6.0* of this document.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5541
FAX (510) 286-5559
TTY 711

Flex your power!
Be energy efficient!

November 4, 2011

SLC101866
SLC-101-P,M,52.17
SCH2011022030

Mrs. Elena Lee
Planner
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA 94301

Dear: Mrs. Elena Lee

Draft Environmental Impact Report (DEIR)/ Edgewood Plaza

Thank you for including the California Department of Transportation (Department) in the environmental review process for the project referenced above. We are particularly concerned with the potential for traffic added by the project resulting in potentially significant operational impacts on U.S. Highway 101 (US-101), and establishing a level of analysis appropriate for identifying these impacts and associated mitigation measures. **C-1**

The DEIR states that a Traffic Impact Study is not required in that the project will add traffic less than 1% of existing capacity on US-101. Expressing added traffic in terms of percentage of the facility's capacity falls short of addressing the project's impact to existing operating conditions. In some circumstances, adding even one car to a failing facility could be a significant impact, particularly where safety conditions may be exacerbated by this addition. Please express in whole numbers the traffic your project will add to US-101. Also, as noted in our October 9, 2008 letter on your Notice of Preparation (NOP) please include schematic illustrations of the traffic conditions and level of service analysis for the following scenarios: 1) existing conditions, 2) existing plus project, 3) cumulative and 4) cumulative plus project for the roadways and intersections in the project area. **C-2**

Should you have any questions regarding this letter, please call Keith Wayne of my staff at (510) 286-5737.

Sincerely,

GARY ARNOLD
District Branch Chief
Local Development – Intergovernmental Review

C. RESPONSE TO COMMENT LETTER C FROM THE CALIFORNIA DEPARTMENT OF TRANSPORATION, DATED NOVEMBER 4, 2011.

Response to Comment C-1:

The comment concerns traffic added by the project to U.S. Highway 101. The project's transportation impact analysis (or TIA), which is included as Appendix O of the Initial Study (Appendix C to the Draft EIR) includes an analysis of the number of project vehicle trips added to four freeway segments of U.S. 101 by the project (Table 7, page 25). The TIA and freeway analysis was prepared following the Santa Clara Valley Transportation Authority (VTA) Congestion Management Program (CMP) guidelines, which apply to all of Santa Clara County. In the CMP Guidelines, a freeway segment analysis shall be included in a transportation impact analysis (TIA) if it meets any one of the following requirements:

1. The proposed development project is expected to add traffic equal to at least one percent of the freeway segment's capacity. The TIA must provide tabulation as shown in Appendix B (of the CMP Guidelines) to show that freeway segments have been assessed to determine if freeway analysis is required, even in the case where it is determined that no freeway segments meet the one percent threshold, or include text indicating that this assessment has been conducted.

2. The proposed development project is adjacent to one of the freeway segment's access or egress points.

3. Based on engineering judgment, Lead Agency staff determines that the freeway segment should be included in the analysis.

As noted on pages 116-117 of the Initial Study and on page 20 of the TIA, the project would not add traffic equal to at least one percent of the freeway segment's capacity and Table 7 of the TIA provides a tabulation to show the assessment of freeway segment capacity. This is consistent with requirement #1, above. City transportation staff as the Lead Agency reviewed the scope of the TIA and the results of the trip generation, trip distribution and trip assignment for the project as well as the thresholds for determination of a significant impact to a freeway segment.

As listed on pages 113 and 114 of the Initial Study, for a significant impact to occur the level of service on a freeway segment would need to degrade either to an unacceptable LOS F or for a segment that is already operating at LOS F, the number of project trips on that segment would constitute at least one percent of capacity on that segment. Based on the number of project trips, LOS conditions based on observations and CMP monitoring of US 101, Lead Agency staff did not determine under requirement #3 that additional analysis of freeway conditions was required to adequately assess environmental effects.

Response to Comment C-2:

The comment letter also asks for figures showing the following scenarios: 1) existing conditions, 2) existing plus project, 3) cumulative, and 4) cumulative plus project for the roadways and intersections in the project area. These scenarios are shown in the TIA (Appendix O of the Initial Study, Appendix C to the Draft EIR) on Figures 6 (page 12), 9 (page 23), and 11 (page 37). The cumulative without the project conditions are not shown graphically, but can be derived by subtracting Figure 8 (project trip assignments, page 22) from Figure 11.

From: Balliet, Michael [mailto:Michael.Balliet@deh.sccgov.org]
Sent: Wednesday, October 05, 2011 5:11 PM
To: Lee, Elena
Cc: Pierce, Mickey; Lee, Lani
Subject: EIR Review - Edgewood Plaza Project

Ms. Lee:

Thank you for distributing the EIR to the Department of Environmental Health, Hazardous Materials Compliance Division.

The Site Mitigation Program has reviewed the proposed project EIR, including the Phase II report and do not have any comments at this time.

We appreciate the opportunity to review this document. Feel free to contact me if you have any questions.

D-1

Michael Balliet, CHMM, REA
Hazardous Materials Program Manager
Solid Waste and Site Mitigation Programs

County of Santa Clara
Department of Environmental Health
Hazardous Materials Compliance Division
1555 Berger Drive #300
San Jose, CA 95112
(408) 918-1976 - Phone
(408) 280-6479 - Fax
www.EHinfo.org

D. RESPONSE TO COMMENT LETTER D FROM THE COUNTY OF SANTA CLARA, DEPARTMENT OF ENVIRONMENTAL HEALTH, DATED OCTOBER 5, 2011.

Response to Comment D-1:

This comment does not raise any questions about the analysis or information in this EIR. No other response is required.

SANTA CLARA
Valley Transportation Authority

November 14, 2011

City of Palo Alto
Planning Department
P.O. Box 10250
Palo Alto, CA 94303

Attention: Elena Lee

Subject: Edgewood Plaza

Dear Ms. Lee:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft EIR (DEIR) for relocations of an existing retail building and 10 new single family residences for a site bounded by Saint Francis Drive, Channing Avenue, West Bayshore Road, and Embarcadero Road. We have the following comments.

Pedestrian and Bicycle Accommodations

On page 31 of the Transportation Impact Analysis it states, "If feasible, the project should build a sidewalk along its frontage on West Bayshore Road. Sidewalks on West Bayshore Road would require removal of existing street trees or reduction in the parking area and residential units." VTA agrees that the sidewalk along West Bayshore Road should be provided, if feasible, to improve connectivity between the plaza, Embarcadero Road, and the nearby neighborhood. **E-1**

The DEIR and TIA do not address bicycle parking in the retail portion of the development. VTA supports bicycling as an important transportation mode and thus recommends inclusion of conveniently located bicycle parking for the project, for both the retail employees and patrons. Bicycle parking facilities can include bicycle lockers for long-term parking and bicycle racks for short-term parking. VTA's Bicycle Technical Guidelines provide guidance for estimating supply, siting and design for bicycle parking facilities. This document may be downloaded from http://www.vta.org/bike_information/index.html. For more information on bicycle systems and parking, please contact Michelle DeRobertis of VTA's Congestion Management Agency Division at (408) 321-5716. **E-2**

Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,

Roy Molseed
Senior Environmental Planner

PA0803

E. RESPONSE TO COMMENT LETTER E FROM THE SANTA CLARA VALLEY TRANSPORATION AUTHORITY (VTA), DATED NOVEMBER 14, 2011.

Response to Comment E-1:

The VTA's recommendation to provide sidewalks on the West Bayshore Road project frontage is noted. Installation of a sidewalk in this area is not currently included in the project, and the City is not requiring it of the project applicant. Pedestrians may still access the site safely from the other sides of the project site. Where the sidewalk ends on West Bayshore (at the south driveway), there is an on-site pedestrian route/path through the project site, connecting to Channing Avenue on the north side.

There are no plans for installing connecting sidewalks to the north on West Bayshore, since this segment of the road is a frontage road for U.S. 101 and is identified as a truck route. Street trees on West Bayshore Road are being removed and replaced as part of the project. Since street trees are required in this location by the City of Palo Alto, there would not be sufficient area on the project site for new sidewalks, while maintaining adequate drive aisles and parking supply on the project site.

Response to Comment E-2:

Bicycle parking for the retail uses is noted in *Section 4.16, Transportation*, of the Initial Study, Appendix C to the Draft EIR (page 120). Eighteen bicycle parking spaces were specified in the Initial Study, this number has since been revised to four bicycle lockers and 13 short-term bicycle parking spaces, which would be adequate to serve the project site (please see the revisions in *Section 6.0*, below).

From: Jeff Levinsky [mailto:jeff@levinsky.org]
Sent: Monday, October 17, 2011 7:20 AM
To: Planning Commission
Subject: Concerns about Edgewood Plaza and Beyond

Dear Commissioners:

Please find below comments I submitted today for the Draft Environmental Impact Report (EIR) for Edgewood Plaza Project. Those comments focus on issues at and near the Edgewood site caused by not considering parking needs of the office building that is part of the original Edgewood Plaza complex.

I'm hoping your commission will address a related issue of whether the proposed retail and residential project is trying to create a giant loophole in Palo Alto's planning regulations. The Edgewood office building undoubtedly relied in past years on the parking offered by the overall shopping center, which was quite adequate to support all parking needs. However, city staff did not include any parking needs for the office building in their evaluation because it sits on a separate parcel and is not part of the proposal. If that building and its likely requirement for 55 parking spaces were to be included in the current proposal, the inadequacy of parking in the proposal would be clear and no doubt addressed.

F-1

Hence, there's a huge loophole here. At its simplest, someone gets permission for a project that spans two parcels and arranges so that one parcel fulfills a requirement of the other. Then, they come back later and obtain permission to increase usage of the first parcel without meeting the requirement for the other. Presto chango: they've gotten around the rules.

F-2

Frankly, if this is legal, why even bother to have city regulations? Clever developers will find ways to use this loophole to evade every rule. I hope you oppose the present attempt to thwart the parking regulations and thus restore fairness for other city projects that do abide by the rules. Otherwise, you'll not only be creating the potential of severe parking problems for the surrounding neighborhood and endangering the viability of future Edgewood Plaza retailers, but you'll also be signaling how to circumvent regulations in other cases too. Please do not condemn our city to that path.

Thank you,

Jeff Levinsky
1682 Hamilton Ave.
Palo Alto, CA 94303

Comments on the Draft Environmental Impact Report (EIR) for Edgewood Plaza Project
Submitted: October 17, 2011

From: Jeff Levinsky [jeff@levinsky.org]
Sent: Monday, October 17, 2011 7:15 AM
To: Lee, Elena
Subject: Comments on Draft EIR for Edgewood Plaza Project

I am concerned about inadequate parking under the proposed development. The Draft EIR does not mention that the adjacent office building at 1101 Embarcadero Road has no parking of its own but instead uses the current shared parking lot that the proposed development will reduce considerably. Specific comments/questions: F-3

1) How large is the office building? The 2002 Draft EIR for the Edgewood Redevelopment Project lists the office building size as 13,688 square feet. A recent advertisement by commercial firm Cassidy Turley listed the office building size as 13,699 square feet.

2) How much parking does the office building require? Present city parking requirements [Section 18.83.050(c)] dictate one parking space per 250 square feet of gross floor area F-4 Based on the square footages above, the office building requires 55 parking spaces.

3) Will the proposed Edgewood project provide the 55 required parking spaces? According to section 2.3.1.4 of the current Draft EIR, only 16 spaces will be provided to employees and visitors of the office building and these are on a non-exclusive basis. That leaves a F-5 shortfall of 39 parking spaces.

4) What other parking options exist for the office building employees and visitors? No parking is allowed on Embarcadero Road next to the office building. Daytime parking is F-6 prohibited on the side of St. Francis Drive adjacent to the office building. All other nearby public parking is in front of residences and intended for uses of those residences.

5) How much parking did the combined shopping center/office building originally have? F-7 Per page 40 of the current Draft EIR, "The original site possessed a series of parking lots to the north, west, and south of the buildings capable of holding approximately 344 cars." The 1970 addition to the grocery store presumably reduced this somewhat.

6) Was parking at the site until now adequate for the office and retail buildings then F-8 on the site? It appears so, given that the present (and enlarged from their original size) retail buildings apparently require no more than 138 spaces per Table 1 of the April 27, 2011 Staff Report. 138 spaces for retail plus 55 for the office building total 193, which is less than 344.

7) Did the shopping center historically provide more than 16 parking spaces for the office building? According to the 2002 Draft EIR, the office building was occupied by F-9 Hewlett-Packard's Neely Sales Division between the years 1969-1974. A sales operation would likely use office space efficiently (as Hewlett-Packard is widely known to do) and thus need more than 16 parking spaces. There is no record of any other off-road parking being provided for the office building in the 2002 Draft EIR.

8) What adverse impacts may or will arise from inadequate parking? Parking congestion in the shopping center lot will negatively impact retail operations by making it difficult for customers to find parking and thus reduce the value and viability of the retail space. Parking congestion in the neighborhoods will negatively impact residence occupants trying to park at or near their homes and on their visitors. Traffic congestion will increase due to office workers and visitors, residents, shoppers, and retail employees looking for available parking spaces. Safety issues could arise from drivers unfamiliar with the neighborhoods looking for parking. Property values for the office building, retail stores, and residences might thus be reduced. These are not mentioned in the Draft EIR. F-10

9) Current use also suggests an additional parking problem. On April 25, 2011, I counted 111 cars parked at the Edgewood Eats event a little before 6 pm. The food trucks and where some people sit occupied about 59 more spaces, for a total of 170. In other words, the approximately 157 proposed parking spaces at the center won't even be enough for Edgewood Eats. And of course, not all 157 spaces will be likely be available at that hour due to regular customers of the shopping center, store employees, office workers, and office visitors. F-11

10) What might be the future parking needs for the office building? First, the office building is presently underutilized, so its full parking needs are not manifest. Second, Palo Alto officials have remarked that shopping and office projects in the city seem to be underparked. Some Silicon Valley firms (e.g., Facebook) reportedly provide smaller work spaces per employee and thus one parking space per 250 square feet is inadequate. Hence, the office building's parking shortfall problem could become even more severe over time. F-12

11) What alternatives are possible? One is to provide at least 55 exclusive off-road parking spaces for the office building rather than the 16 non-exclusive parking spaces in the proposal. Another is to have the 55 spaces be non-exclusive, which can then benefit events such as Edgewood Eats if held after normal business hours while meeting the needs of a fully-occupied office building during business hours. F-13

Thank you,

Jeff Levinsky
1682 Hamilton Ave.
Palo Alto, CA 94303
(650) 328-1954
jeff@levinsky.org

F. RESPONSES TO COMMENT LETTER F FROM JEFF LEVINSKY, DATED OCTOBER 17, 2011.

[**Note:** The comments in this letter refer to the office building at 1101 Embarcadero Road, which is not included in the proposed project. The comments also refer to information contained in the 2002 Draft Environmental Impact Report prepared for a previous project on the Edgewood Plaza site by the City of Palo Alto Redevelopment Agency. The City of Palo Alto is not relying on that document for environmental review under CEQA for the current project, as that EIR was not certified, and the larger project proposed at that time did not proceed.]

Response to Comment F-1:

The commenter raises a number of concerns regarding the parking provided for the office building at 1101 Embarcadero Road. The three buildings at the project site and the office building have shared parking under several arrangements since their original construction, as they were all included in the original Edgewood Plaza development in the late 1950's. Currently, there is an existing legal condition between Edgewood Plaza and the building at 1101 Embarcadero Road that allows the office building to use 16 parking spaces on the shopping center site. The current project proposes to continue this agreement; and would provide 16 spaces through a non-exclusive easement for the occupants of this building (refer to *Section 4.16, Transportation*, in the Initial Study, Appendix C of the Draft EIR).

Under existing conditions, the adjacent building at 1101 Embarcadero Road is owned and operated by the Vedic Center, which teaches meditation techniques. Based upon information provided by the project applicant, Sandhill Properties, there are up to three employees at the Center and students visit during daytime and evening hours (until about 9:00 p.m. on some evenings). In November 2011, the Vedic Center's co-director Michael Yankaus reported that generally only three to six cars from employees, students and other users of the Vedic Center park in the adjacent parking lot at a time. This was confirmed during a late morning parking count (six to eight cars during a peak parking period for office and retail uses) and early evening parking count (six cars) on February 9, 2012 by David J. Powers & Associates staff, although not all of these vehicles appear to be users of the Vedic Center. Similar parking utilization (i.e., fewer than eight to ten cars in the parking area closest to 1101 Embarcadero Road) was observed during other daytime site visits in 2010 and 2011. For the existing use, the 16 parking space allocation appears adequate.

It is acknowledged that a future change in building use at the adjacent 1101 Embarcadero Road building, through a change in ownership or tenancy, has the potential to increase parking demand over existing conditions. Parking demand for individual office uses does vary with the type and intensity of the use. For example, an office use with few employees and/or clients present at one time (such as the existing use) would have a lower parking demand than an office, such as a software firm or other high tech use, where there are more employees per square foot of building space and those employees are on-site the entire workday. The "likely" requirement for 55 parking spaces referenced in this comment reflects a higher intensity of office use than the existing condition at 1101 Embarcadero Road.

A one-time *Certificate of Use and Occupancy* is required for all new businesses and change of tenants in Palo Alto. If the office building at 1101 Embarcadero Road changes occupancy (i.e., changes owner-occupant or is leased to a tenant), completion of this permit application would be required by the City's Planning Division prior to approval of the change in use. If the proposed use is more intense than the current use, the City would require a planning study to address any potential impacts, including the adequacy of parking supply. Redevelopment of the office building site would

be subject to a development permit, which would require compliance with the City's parking requirements.

It is important to note that the Edgewood Plaza and adjacent office building have been zoned *Planned Community (PC)* since its development, which allows for flexibility with parking and other standards. Although the parking requirement in the Municipal Code for administrative office uses is one space per 250 square feet, all of the original Eichler shopping center, including the office building and the gas station at 1161 Embarcadero Road, are included in the *Planned Community (PC1643)* zoning, which allows the City more flexibility with parking and other requirements of the City's zoning code. Under the *PC* zoning, the Plaza and office building are not required to conform to the requirements of parking standards for similar land uses, and based on this, the commenter's calculation of 55 parking spaces is not required under the City's zoning code.

Response to Comment F-2:

As described in Response F-1, in the event that the office building is proposed for redevelopment or reuse, the parking supply for the building would be reviewed by the City at that time through the use and occupancy permit process, and/or the planning permit process. Without an application on file for this building, or any proposal to change the existing land use, further estimates of parking requirements for possible, undefined future uses of the 1101 Embarcadero Road property would be speculative.

Response to Comment F-3:

As mentioned previously in Response to Comment F-1, *Section 4.16, Transportation* of the Initial Study, Appendix C of the Draft EIR does describe the existing parking at the office building and at Edgewood Plaza in general.

The office building adjacent to the project site at 1101 Embarcadero Road was a part of the original development in the late 1950's and is 13,688 square feet in size, based on City of Palo Alto building records. Approximate 3,000 square feet of the building is located in a mezzanine which is used for storage, leaving approximately 10,300 square feet of usable space.

Response to Comment F-4:

Please refer to Response F-1, above. Modifications to the office building or its use are not part of the currently proposed project and the project applicants propose to maintain the existing parking agreement for 16 spaces with the owners of the adjacent office building. As noted in Response F-1, under the existing use of 1101 Embarcadero Road, the parking supply of 16 spaces appears adequate.

Response to Comment F-5:

The Edgewood Plaza project would provide 156 parking spaces for the retail uses, including the 16 spaces provided under an existing non-exclusive easement for the office building, as described in *Section 4.16, Transportation* of the Initial Study, Appendix C of the Draft EIR. The Edgewood Plaza is zoned *Planned Community*, and, based on this, the City has flexibility in determining the appropriate number of parking spaces required for the site. Please see Response F-1 for information regarding the permit process that would apply in the event of a proposed future change of use of this building.

Response to Comment F-6:

The comment on the availability of street parking near the office building next to the project site is accurate, and is noted. Parking is allowed adjacent to 1101 Embarcadero Road on Saint Francis Drive between 7:00 p.m. and 7:00 a.m.

Response to Comment F-7:

A detailed history of the parking arrangements between the office building and the shopping center in the 1960's is likely unavailable, and is beyond the scope of this EIR, which for transportation and parking considers existing conditions and project conditions. The 344 parking spaces referred to in the EIR and a 2009 Historic Resources Study by Page & Turnbull referred to parking spaces on a 1955 plan; subsequent newspaper articles at the time of opening of the grocery store and commercial center refer to parking for 150-250 cars (pages 18 and 19 of the Page & Turnbull report in Appendix C of the Initial Study.)

At the time of the issuance of the Notice of Preparation of the Draft EIR, the shopping center contained approximately 250 parking spaces.

Response to Comment F-8:

The parking on site is adequate for the existing retail and office uses. As discussed in Response to Comment F-5 and on pages 121-122 of the Initial Study (Appendix C to the Draft EIR), the proposed parking also is considered adequate to limit spillover into the adjacent neighborhood.

Response to Comment F-9:

As discussed previously in Response to Comment F-7, the history of the parking arrangements between the office building and the shopping center in the 1960's and 1970's is beyond the scope of this EIR, as is a more detailed analysis of the operational history of the office building at 1101 Embarcadero Road, a building that would not be modified under the proposed redevelopment project.

The Draft EIR prepared by the City of Palo Alto Redevelopment Agency in 2002 for a previous project on the site was not certified, and City of Palo Alto is not relying on that document for CEQA environmental review for the current project.

Response to Comment F-10:

The comment letter has not provided any information that the parking for the proposed project is inadequate, based on the proposed PC zoning for the site, or provided any evidence that parking will impact residential neighborhoods nearby negatively. Inadequate parking supply would not be a substantial environmental impact, unless parking issues lead to other land use or transportation impacts, such as parked cars blocking driveways or access for emergency vehicles. No change in the quantity of parking supply for the office building from the existing condition (which has been in place for a number of years) is proposed by the project.

The parking, circulation, and access impacts of the project were studied in the transportation impact analysis and in the Initial Study (attached to the Draft EIR as Appendix C). No significant environmental impacts were identified from this analysis.

To help manage parking, the applicant has agreed to include the following measure in the Transportation Demand Management program to avoid affecting neighboring streets from parking overflow. The project applicant and/or Edgewood Plaza owner will conduct a parking monitoring program for a minimum of six months after full occupancy of the retail portion of the Edgewood Plaza site, or as directed by the City of Palo Alto Director of Planning and Community Environment. The monitoring program will record the number of parked vehicles during the anticipated peak times of 11:00 a.m. to 2:00 p.m. and 6:00 p.m. to 8:00 p.m. If parking demand is found to exceed parking supply, one or more of the following strategies will be employed as a part of the project's Transportation Demand Management (TDM) program to limit parking spillover:

- Offer parking cash-out (financial payment) to employees who forego their parking space on-site and get to work by carpooling, bicycling, walking, or taking transit; and/or
- Increase use of TDM measures (such as facilitating a carpool matching service for employees on site, or increasing short-term bicycle parking on the site).

Response to Comment F-11:

Permits for the Edgewood Eats events, if scheduled following project development, would continue to be required by the City of Palo Alto. Parking and access would be considered based on site conditions at the time of any permit application.

Response to Comment F-12:

As described in Responses F-1 and F-2, in the event that the adjacent office building at 1101 Embarcadero Road is proposed for redevelopment or reuse at some time in the future, the parking supply for the building would be reviewed by the City at that time through the use and occupancy permit process and/or the planning permit review process. Speculation about the future tenants or uses at a building adjacent to the proposed project is beyond the scope of this EIR. No further response is required.

Response to Comment F-13:

Adding additional parking spaces, as called for in this comment, would require a reduced project size or structured parking on the site. Additional parking spaces for retail, and the adjacent office use could be provided under the No Project alternative scenarios and the Reduced Residential Density alternative described in *Section 7.0, Alternatives* of the Draft EIR. Structured parking would not meet the basic objective of the project related to redevelopment of the site reflecting the mid-century aesthetic and design of existing buildings and the surrounding neighborhood.

Heather Rosmarin
1982 West Bayshore Road, #137
East Palo Alto, CA 94303
(m) 415-902-9342
hrosmarin@mac.com

Via Email

October 26, 2011

Elena Lee
Department of Planning and Community Environment
250 Hamilton Avenue
Palo Alto, CA 94301,

Elena.Lee@CityofPaloAlto.org

RE: Draft Environmental Impact Report ("DEIR")
Edgewood Plaza Project
Palo Alto File No. 08PLN-00157/10PLN-00198
State Clearinghouse No. 2011022030

Dear Ms. Lee:

I have the following comments on the above-referenced DEIR.

1. Request for Clarification and Recirculation of Notice and Comment Deadline: The Notice of Availability and Completion of the DEIR is flawed and contradictory in that it states (i) that public review ends on, and comments may be submitted by, November 14, 2011 but (ii) that issues must be raised at or prior to the public hearing described in the notice (i.e., the hearing on October 26, 2011). A single deadline for all comments and issues should be clearly noticed. For the full 45-day public review and comment period to be effective, the public should be allowed to submit comments and raise issues until at least November 14, 2011. **G-1**

2. Issues

(a) The description of "Surrounding Land Uses" (Section 3.1.1.) is flawed and incomplete. The DEIR fails to include in its analysis the multiple residential housing units located approximately one-half mile north of the Project on West Bayshore Road. Woodland Creek Condominiums (1982 West Bayshore Road) is a community of 90 homes that will be affected by the construction and operation of the Project. **G-2**

(b) The analysis of traffic impacts is flawed and incomplete.

1) The DEIR and Transportation Impact Analysis (TIA) fail to study the impacts of increased vehicle traffic on West Bayshore Road between Embarcadero and Woodland Ave. both during construction and operation. **G-3**
2) The TIA fails to note that there is a major CalTrans construction project planned for 2012-2015 that will temporarily close sections of West Bayshore Road between the San Francisquito Creek bridge and the Project site. **G-4**
3) The plans provided for public review were unclear as to whether truck traffic will come from the north on West Bayshore Road. Routing any truck traffic through the residential neighborhoods on West Bayshore Road raises concerns about noise and is objectionable, given that trucks can enter the center from the 101/Embarcadero offramp. **G-5**

(c) The analysis of bicycle and pedestrian access to the Project site is flawed and incomplete. The DEIR states that "sidewalks, bike lanes and paths surrounding the site provide facilities for pedestrians and bicyclists to access [transportation options] from the site." (68). The TIA concludes that "Bicycle access to the site is adequate" (vi). **These statements are incorrect**: **There is no safe pedestrian or bicycle access from West Bayshore Road. Therefore, the Project will increase vehicle fuel use and create safety hazards.**

1) West Bayshore Road borders the Project site to the East. The stretch of West Bayshore Road from the East Palo Alto/Palo Alto Border (San Francisquito Creek) to the Project site is within the City of Palo Alto's (City) jurisdiction. This stretch of West Bayshore Road is currently hazardous for pedestrians and bicyclists because there is no sidewalk or bike lane. It is foreseeable that bicycle and pedestrian activity on West Bayshore Road will increase significantly once the shopping center is redeveloped, increasing the risk of accidents and injuries. The 1982 West Bayshore community includes many families with small children. Without safe pedestrian and bicycle access, many residents will choose to drive to the shopping center, thereby increasing traffic on Palo Alto streets. G-6

2) Consistent with the City's Comprehensive Plan, particularly Policy T-14, there should be safe bicycle and pedestrian access to the shopping center from West Bayshore Road via a sidewalk and bike lane. G-7

3) The City should require the Project developers to demonstrate how pedestrians and bicyclists will access the Project site from the north along West Bayshore Road. The current shopping center has pedestrian access points at the NE corner (Channing and West Bayshore Road). However, these access points were eliminated in the plans provided for public review in Fall 2010. The "Conceptual Site Plan" in the DEIR (p. 14) does not indicate pedestrian access points. G-8

4) There should be bicycle parking facilities at the shopping center. G-9

(d) The shopping center should be required to prevent/mitigate litter and keep shopping carts within the Project site.

If the shopping center has a market and take-away food stores, it is foreseeable that both litter and shopping carts (if removed from the shopping center) will have a negative impact on adjacent neighborhoods. The DEIR does not adequately address the impact of litter on the neighborhoods. The construction of fences to prevent blown litter is an inadequate mitigation measure. The shopping center should be required to pay for janitorial services to remove litter from the streets surrounding the Project site. The market tenant should be required to implement measures to prevent shopping carts from leaving the Project site (e.g., wheels that lock if removed from the premises). G-10

Sincerely,

Heather Rosmarin

cc: Woodland Creek Homeowners Association c/o CJM Association Services

G. RESPONSES TO COMMENT LETTER G FROM HEATHER ROSMARIN, DATED OCTOBER 26, 2011.

Response to Comment G-1:

The comment pertains to the Notice of Availability of the Edgewood Plaza Project Draft EIR made available at the time the Draft EIR started circulation, rather than the Draft EIR itself. The section of the Notice of Availability referred to in this comments states:

> "If any person challenges this item in court, that person may be limited to raising only those issues the person or someone else raised at the public hearings described in this notice, or in written correspondence delivered at, or prior to, the public hearings."

Above this paragraph, the Notice of Availability states that written comments are requested prior to November 14, 2011, at 5:00 p.m. The Notice also describes a public meeting to take comments to be held on October 26, 2011.

The public hearings that the Notice refers will be held by the Planning and Transportation Commission and the City Council for certification of the EIR after the public comment period closes on November 14, 2011. Comments may be made by the members of the public up to the time that the City Council closes the public testimony for the project at the hearing to consider certification of the EIR and the adoption of Findings, although comments submitted after November 14, 2011 may not receive responses in writing. If the item is challenged in court, the challenge would be limited only those items raised prior to the City Council's final action on the project.

A notice was circulated by the City on November 8, 2011 to clarify that the deadline for written comments was November 14, 2011. The City apologizes for any confusion resulting from this notice, and will revise future notices to clarify the hearings for the project.

Response to Comment G-2:

The Woodland Creek complex in the City of East Palo is approximately 1,200 feet north of the northern boundary of the project, across San Francisquito Creek. Although the neighborhood surrounding the Edgewood Plaza project site contains primarily single-family residential uses, *Section 3.1.1.1* of the text of the Draft EIR has been revised to reflect the multi-family residential uses mentioned in the comment.

The comment letter provides no evidence that the Woodland Creek Condominiums would be subject to substantially different or greater impacts than those evaluated for other residential uses near the project site.

Response to Comment G-3:

The transportation impact analysis (TIA) was conducted such that the potential impacts of the project were evaluated in accordance with the standards set forth by the City of Palo Alto and the Santa Clara Valley Transportation Authority (VTA) Congestion Management Program (CMP). The trip distribution pattern for vehicle trips generated by the proposed retail and residential uses is described on Page 116 of the Initial Study (Appendix C to the Draft EIR). The trips are shown graphically on Figure 15 (Page 115 of the Initial Study), which shows that the segment of West Bayshore Road between the project's site and Woodland Avenue would experience six percent of the project retail trips, and zero percent of the residential trips. The six percent of project retail trips northwest of San

Francisquito Creek on West Bayshore Road would not exceed 10 additional cars per lane at the intersection of West Bayshore Road and Woodland Avenue during either peak hour period, and therefore this intersection was not evaluated for possible intersection level of service impacts.

The transportation impact analysis prepared for the project EIR studied the traffic for the project site using a very conservative baseline of completely vacant buildings. The Edgewood Plaza has been in operation since the late 1950's, and contained an operating grocery store and other retail uses at the time the Woodland Creek Condominiums were constructed in the 1990's. As disclosed in the EIR, with both the renovation of the existing buildings and the addition of ten single-family houses, the traffic impact on local intersections would be less than significant.

Response to Comment G-4:

A discussion of the San Francisquito Bridge replacement project and possible impacts on transportation under cumulative conditions has been added to the EIR. Please see the revisions to *Section 4.0, Cumulative Impacts* of the Draft EIR, and *Section 4.16.2.4, Site Access and Circulation* of the Initial Study, Appendix C of the Draft EIR in *Section 6.0,* below. Construction closures of the San Francisquito Creek Bridge would not result in any new, significant transportation impacts.

Response to Comment G-5:

Truck circulation during project operations is discussed on Pages 119-120 of the Initial Study, Appendix C to the Draft EIR, and impacts to residential uses from transportation impacts were found to be less than significant.

West Bayshore Road, as a frontage road to the Bayshore Freeway (U.S. 101), is identified by the City of Palo Alto as an acceptable route for truck traffic within the City limits by the Palo Alto Municipal Code (PAMC 10.48.040). A portion of West Bayshore Road is also identified as a truck route by the City of East Palo Municipal Code (EPAMC 10.36.050). Trucks are expected to enter the site from U.S. 101 and Embarcadero Road to the south, and would exit via West Bayshore Road to the north. Trucks could then either exit via West Bayshore Road to the north, but are more likely to exit via Channing Avenue to St. Francis Drive, turning left to return to U.S. 101. Smaller trucks (less than seven tons) are not constrained by the designated truck routes described in the Palo Alto Municipal Code.

Approximately one oversized truck per day is anticipated to serve the site. Please see clarifications to the discussion in *Section 4.16.2.4, Site Access and Circulation* of the Initial Study (Appendix C of the Draft EIR), in *Section 6.0,* below.

Response to Comment G-6:

The first statement referenced in this comment was included in the discussion of fuel for motor vehicles in *Section 3.3, Energy* of the Draft EIR and addressed transportation modes available for future residents and employees. While under existing conditions there are no sidewalks north of the site on West Bayshore Road, there are sidewalks and bicycle facilities in the vicinity of the project site that could be used by future residents, employees, and customers from other residential areas to access the site. Text has been added to the EIR to clarify that pedestrians and bicycle access along West Bayshore Road would continue to be limited. Overall, this existing condition would not represent a significant energy impact of the proposed project, the redevelopment of a neighborhood-serving commercial center with new retail and residential uses.

Bicycle and pedestrian facilities are described on Page 106 and 120 of the Initial Study. West Bayshore Road, between the project site and East Palo Alto is described in the Initial Study as a frontage road to U.S. 101, and does not currently have bicycle lanes.

No future bicycle facilities are proposed for this roadway segment, based on the City of Palo Alto's 2012 *Final Draft Bicycle and Pedestrian Transportation Plan*, or the adopted 2003 *Bicycle Transportation Plan*. Although it is acknowledged that bicycle lanes are not provided from all directions to the project site, the project is not in conflict with an adopted bicycle transportation plan, and therefore the lack of bicycle facilities on West Bayshore Road to East Palo Alto would not represent a significant transportation impact. Based on Palo Alto standards, the overall access to the project site for bicycles was found to be adequate.

Response to Comment G-7:

The Palo Alto Comprehensive Plan policy the comment refers to is as follows:

> *POLICY T-14*: Improve pedestrian and bicycle access to and between local destinations, including public facilities, schools, parks, open space, employment districts, shopping centers, and multi-modal transit stations.

The Palo Alto Comprehensive Plan is an adopted statement of long-term goals, policies, and programs for guiding the future development of the City. Although the City aspires to provide pedestrian and bicycle access as described in the policy, the constraints of the different locations and sites throughout the City do not allow the City to install sidewalks and bike lanes on all roadways. Nor does Policy T-14 require such pedestrian and bike lanes on all roadways. As discussed in Response E-1, sidewalks adjacent to the site on West Bayshore Road are not proposed because of site constraints related to street trees, parking supply, and drive aisles on the project site, and new bicycle and sidewalk facilities are not planned by the City of Palo Alto along West Bayshore Road north of the project site, as described in Response G-6.

Response to Comment G-8:

The comment is noted. Pedestrians and bicycles would access the site from West Bayshore Road to Channing Avenue, and then would access the sidewalks in the Channing Avenue/St. Francis Drive area. The only access points that have been eliminated are the existing access points in the area that is proposed for residential uses. The loss of these access points does not represent a significant transportation impact, since pedestrians can still access the site at a number of other locations.

Response to Comment G-9:

Please see Response E-2, above.

Response to Comment G-10:

Retail and grocery uses on the Edgewood Plaza site, which have been on site on and off since approximately 1956, are subject to the requirements of the Palo Alto Municipal Code (including Chapter 9.48.040, "Discarding rubbish, dirt, leaves, debris or discarded material on streets or other public or private properties"). The applicant is also proposing a shopping cart corral, and would be subject to performance standards contained in the revised *Planned Community* zoning and development permit.

From: Carolyn Kiernat [mailto:kiernat@page-turnbull.com]
Sent: Thursday, October 27, 2011 9:38 AM
To: Lee, Elena
Cc: Jay Turnbull
Subject: Fwd: P&T Comments to DEIR dated September 2011

Dear Elena,

Page & Turnbull's comments to the Draft EIR proposed mitigation measures are below. If you have any questions, please feel free to contact me anytime.

I am sending this from my phone, so if there is any trouble with it, let me know and I will resend it from my computer tomorrow.

Sincerely,

Carolyn Kiernat
415-593-3218

Dear Elena,

We have reviewed the Draft Environmental Impact Report prepared for the Edgewood Plaza Project and we would like to respond to the proposed mitigation measures identified in the Summary section on page vi and in Section 3.0: Environmental Setting, Impacts, and Mitigation on page 60.

The first proposed mitigation measure for historic resources reads:

> **MM CR-2.1**: Historic American Buildings Survey (HABS) documentation of the exterior of Buildings 1 and 2 and their setting shall be prepared by the applicant and project consultants prior to the relocation of Building 1 and remodeling of Building 2. Following the HABS guidelines, this documentation shall include full measured drawings, large-format photography, and an historical overview of both Buildings 1 and 2. The documentation shall be filed by the applicant with City of Palo Alto Historic Preservation Officer, prior to the start of construction.

H-1

Page & Turnbull comments: While it is important to create a permanent record of a historic resource before it is altered, we think that the level of HABS documentation proposed in this mitigation measure is excessive. We recommend changing this mitigation measure to modified HABS Level III documentation which would include the following:

- Sketch plan of the existing site or reproductions of original drawings.
- Up to 12 large-format photographs (4x5) of exterior views.
- One-page written summary of project site's history.
- Transmittal of one set of documents to the City of Palo Alto Historic Preservation Officer or to a relevant local historical society, library or repository.

The second proposed mitigation measure for historic resources reads:

MM CR-2.2: The applicant shall create a display illustrating the history of Eichler Homes on the site and in the vicinity, prior to approval of final occupancy.

Page & Turnbull comments: We do not think that a display of Eichler Homes is a meaningful way to commemorate or mitigate the relocation of a retail building. If an interpretive display is required, we would recommend focusing its content on the uniqueness of an Eichler shopping center.

The third proposed mitigation measure for historic resources reads:

MM CR-2.3: Distinctive materials and defining architectural features, finishes, and construction techniques of Buildings 1 and 2 including windows, frames, and eaves will be retained. Following the relocation and reconstruction of Building 1 and the rehabilitation of Building 2, a qualified historic preservation architect shall review the remodeled buildings and verify that historic façade elements have been adequately installed, and that the work on these buildings is in keeping with the Secretary of the Interior's Standards for Rehabilitation, Standards #5, 6, 7, and 9.

The final design and materials to be used in the renovation of these buildings will be reviewed and approved by the Historic Preservation Officer and Building Official. A report shall be submitted to the Historic Preservation Officer and Building Official following completion of the relocation and reconstruction, and prior to approval of final occupancy.

H-1

Page & Turnbull comments: As Jay Turnbull explained during the October 19, 2011 Palo Alto Historic Resources Board meeting, the relocation and rehabilitation of the retail buildings on the site may require alterations to accommodate accessibility, safety and new compatible uses. These changes might include alteration of existing doorways that are currently not ADA-compliant, replacement of glass storefronts with tempered or laminated glass for public safety, and installation of new doors and window frames where deterioration or unsatisfactory performance requires replacement.

The exterior walls of the existing retail buildings have been substantially altered from their original design. We have identified the repetitive design components from the original design and believe that the buildings should be rehabilitated so that incompatible alterations are removed and so that new alterations are permitted where building code requirements are not currently met or current condition is deteriorated.

While the Secretary of the Interior's *Standards for Rehabilitation* should be followed, we believe the review for compliance with the *Standards* should take place before construction commences, not after it is complete.

Carolyn Kiernat, AIA
Principal

PAGE & TURNBULL
imagining change in historic environments through design, research and technology

1000 Sansome Street, Suite 200, San Francisco, California 94111
415.593.3218 (direct) | 415.362.5154 (main) | 415.362.5560 (fax)
kiernat@page-turnbull.com | www.page-turnbull.com

H. RESPONSES TO COMMENT LETTER H FROM PAGE & TURNBULL, DATED OCTOBER 27, 2011.

Response to Comment H-1:

The proposed revisions to mitigation measures recommended by Page & Turnbull were reviewed by the City of Palo Alto's historic consultant for this project, Carey & Company, and City of Palo Alto staff. The proposed modifications and clarifications to the mitigation measures would not reduce the effectiveness of the proposed documentation or oversight or change the conclusions in the EIR regarding the significance of cultural resources impacts. Please see the revisions to mitigation measures **MM CR-2.1**, **MM CR-2.2**, and **MM CR-2.3**, in *Section 6.0*, below.

From: Eduardo Martinez [mailto:chairmartinez@gmail.com]
Sent: Tuesday, November 01, 2011 10:12 AM
To: Lee, Elena
Subject: Edgewood DEIR Comments

Elena

Here are some of the items I want to add to my comments:

Relocation of the Monument Sign:
The DEIR should address the historic significance of relocating the monument sign. **I-1**

Land Use Policies in Palo Alto:
I would like to see in the Executive Summary a description of the consistencies and impacts of the proposed project on our current land use and community design policies: Neighborhood Centers, pedestrian friendly streets, grocery stores, etc. **I-2**

thank you,
Eduardo

I. RESPONSES TO COMMENT LETTER I FROM EDUARDO MARTINEZ, CHAIR, PLANNING AND TRANSPORTATION COMMISSION, DATED NOVEMBER 1, 2011.

Response to Comment I-1:

A review of the plans submitted by the applicant for the Architectural Review Board meeting on November 3, 2011, confirms that in the current site plans, the monument (marquee) sign would be relocated on the site to a location very close to its current historic location. The description in the Draft EIR was based on an earlier site plan where the monument sign was moved further away on site. Based on the current plan, the historic character of the site or the sign would not be impacted by the sign's relocation. Please see the revisions in *Section 6.0* to the Draft EIR and Initial Study that clarify this issue.

Response to Comment I-2:

The contents of the summary for the Draft EIR is defined by the CEQA Guidelines, Section 15123, which recommend that the summary should normally not exceed 15 pages. The Edgewood Plaza EIR summary contains all of the elements specified in the Guidelines, including the project description, significant effects, mitigation measures, alternatives, areas of controversy, and issues to be resolved, including the choice of alternatives and whether or how to mitigate the significant effects.

The project's consistency with the Palo Alto Comprehensive Plan is discussed in specific sections of the Draft EIR, including *Section 3.1.4.4, Land Use,* pages 29-32, and in *Section 3.2.5.4, Cultural Resources*, pages 58-59.

A summary list of Palo Alto Comprehensive Plan land use and community design element policies that apply to the project has been added to the EIR per the request in Comment I-2. This list is based on the analysis in the Draft EIR. Please see the new EIR Appendix D in *Section 6.0,* Revisions to the Draft EIR and Initial Study.

From: Alan Sonneman [mailto:asonneman@mac.com]
Sent: Saturday, November 12, 2011 2:45 PM
To: Lee, Elena
Subject: Draft EIR for Edgewood Shopping Center

I would like to make the following comments on:

Edgewood Plaza Project
Palo Alto File No. 08PLN-00157/10PLN-00198
State Clearinghouse No. 2011022030

1. Height limit of the proposed housing
The proposed height of the housing is unacceptable in relation to the one store houses across the street and the neighborhood in general. The houses are proposed to be approx. 24 ft high, the same height as the top of the proposed mechanical roofing screen of the grocery store front section adjacent to the housing. This is driven by the motivation to maximize housing size not by compatibility with the neighborhood that has a one store restriction in it's CC&Rs. A height of no more than 18 ft for 2 stories would be acceptable. J-1

2. Density of the proposed housing
The proposed housing is much denser than the adjacent houses across the street and is not acceptable, I strongly urge you to only allow 2 or 3 bedroom houses not 4 with a much lower density, more in keeping with the neighborhood, these houses should feel like a transition, not a citadel. J-2

3. Parking for adjacent office building and center employees
Parking is not being adequately address. By adding housing, parking is being significantly reduced. First there is an adjacent office building that has an agreement to share 16 spaces with the center, this building in the future could be rented out to a startup and easily filed with a 100 people flooding the neighborhood streets with parked cars. J-3 Second, no discussion has been made of parking for employees, how many employees there will there be and where they will park. I would assume they will park on neighborhood streets. J-4

4.Waste storage
I assume that there will be several restaurants; there is not adequate waste disposal for perishable refuse, with the shops facing the interior of the center the back doors and the waste bins will be facing the neighborhood. This needs to be addressed with adequate screening. J-5

5. Loading and unloading
Access for servicing the restaurants and shops is not being addressed. With the rear or these establishments facing the neighborhood this will encourage late night and early morning use of the street by vendor deliveries. J-6

I hope you can remedy these issues in your final zoning modifications.

Thank you

Alan Sonneman
1938 Channing Ave.
Palo Alto, CA 94303

asonneman@mac.com

alansonneman.com
lastwashingtonpainting.com
thesouthernsierra.com

650 494-7121 h
650 465-3790 c

J. RESPONSES TO COMMENT LETTER J FROM ALAN SONNEMAN, DATED NOVEMBER 12, 2011.

Response to Comment J-1:

The commenter's opinion on the proposed height of residential buildings is acknowledged. The design of the proposed residential units are reviewed several times by the Architectural Review Board (ARB), to ensure that the units are compatible with the existing neighborhood and Palo Alto design standards.

These meetings included the ARB meeting on November 3, 2011, where the back wall of the grocery store was discussed, and the applicant provided further details on the design. The ARB asked the applicant for changes to the project, which were reviewed at the ARB meeting on February 2, 2012. The ARB recommended approval, and the project was found to be consistent with the Architectural Review Board findings.

The Planning and Transportation Commission (PTC) will have an opportunity to review the revised plans for the site, prior to consideration of the project by the Palo Alto City Council.

Response to Comment J-2:

The commenter's opinion on the density of the neighborhood is acknowledged. Please also refer to Response J-1.

Response to Comment J-3:

The commenter's opinion regarding the adequacy of parking at the adjacent office building if there was a change in users at some time in the future is noted. Please see the responses to Comment Letter F, above.

Response to Comment J-4:

Parking for employees of the Edgewood Plaza is included in the calculations for the overall shopping center, and as described in *Section 4.16, Transportation* of the Initial Study (Appendix C of the Draft EIR).

Response to Comment J-5:

The remodeled shopping center has been designed so that all deliveries to the retail shops are completed through the front doors facing the parking area and along West Bayshore Road. The west side of Building 1 and 2 that face St. Francis Drive and/or the park have been designed to be compatible with the neighborhood, and have only limited pedestrian access from the back. The two trash enclosures for the retail uses are located on the south boundary of the project site near the gas station (for the retail buildings) and on the east side of the grocery store near the loading dock. Both trash areas are completely enclosed, and the details of their design has been reviewed by the Architectural Review Board and found consistent with ARB findings.

Response to Comment J-6:

As discussed in the previous response, and in *Section 4.12, Noise*, of the Initial Study, the two retail buildings would be front-loaded, meaning that deliveries would pass through the store's front doors

only. Allowed delivery hours will be limited to 7:00 a.m. to 10:00 p.m. per mitigation measure **MM NOISE-2.2** (see page 93 of the Initial Study, Appendix C of the Draft EIR). The retail buildings have no vehicular access from the sides facing the residential uses, and the buildings would shield noise from deliveries and other activities from the adjacent residences.

From: Gary Marshall [mailto:gary.1marshall@mac.com]
Sent: Monday, November 14, 2011 4:42 PM
To: Lee, Elena
Subject: Draft EIR for Edgewood Plaza Project [Palo Alto File No. 08PLN-00157/10PLN-00198]

COMMENT

The Housing/Residential component of this project, as currently proposed, raises definite and significant concerns.

The combination of the height and density, particularly, as well as the location of the proposed housing are inappropriate and will have a negative effect on the immediate and surrounding environmental experience. **K-1**

The height is discordant with the immediate and surrounding neighborhood, which is governed by CC&Rs stipulating one-story housing. Within the last several years, a house at Channing & Wildwood, two spots down from Edgewood Plaza, submitted plans for a 2nd-story addition - there was sufficient neighborhood opposition expressed re this for the relevant city commission to recommend to the owner not to proceed as their approval would almost certainly be unlikely. As the Carey report suggests, there is another location on the site where the height issue would not be so problematic.

The density of the housing is also discordant with the immediate and surrounding neighborhood. In addition, at the proposed location, this density of housing will functionally serve as a visual and psychological wall/barrier separating the neighborhood from the Plaza. **K-2**

The current location also presents a problem with the vista from within the Plaza, with now open sight lines to the adjacent neighborhood becoming blocked off and countermanding the prevailing aesthetic. **K-3**

Thank you for your consideration.

Gary Marshall

693 Wildwood Lane
Palo Alto, CA 94303

K. RESPONSES TO COMMENT LETTER K FROM GARY MARSHALL, DATED NOVEMBER 14, 2011.

Response to Comment K-1:

The commenter's opinion on the density of the neighborhood and the height of the proposed houses is acknowledged. The design of the proposed residential units are reviewed several times by the Architectural Review Board (ARB), to ensure that the units are adequately compatible with the existing neighborhood and Palo Alto design standards and architectural review findings (also see Response J-1). The proposed residential units are also separated from the surrounding neighborhoods by the width of Channing Avenue and St. Francis Drive. The Edgewood Plaza and the proposed residential units are not subject to the CC&R's for the adjacent neighborhood, which are private requirements, and cannot be enforced by the City.

Response to Comment K-2:

Please see Response K-1.

Response to Comment K-3:

The commenter's opinion on the views from the Edgewood Plaza is acknowledged. The proposed houses would reduce views of the existing neighborhood to the north. Although the views of the neighborhood from a private commercial development would change, overall this would represent a less than significant visual impact, based upon the thresholds of significance in *Section 4.1, Aesthetics* of the Initial Study (Appendix C of the Draft EIR).

Aesthetic values are, by their nature, very subjective. Opinions as to what constitutes a degradation of visual character will differ among individuals. One of the available means for assessing what constitutes a visually acceptable standard for new buildings are the City's design standards and implementation of those standards through the City's Architectural Review process. As described in Responses J-1 and K-1, and in the Initial Study, a review of the compatibility with the surrounding neighborhood and compliance with Palo Alto design guidelines will be completed by the City's Architectural Review Board prior to consideration of the project by the City Council.

WOODLAND CREEK HOMEOWNERS ASSOCIATION

Street Address: 1982 West Bayshore Road, East Palo Alto, CA 94303
Mailing Address: c/o CJM Association Services, Inc., P.O Box 190, Pleasanton, CA 94566

November 14, 2011

Elena Lee, Senior Planner
Department of Planning and Community Environment
250 Hamilton Avenue, 5th Floor
Palo Alto, CA 94301
Elena.Lee@CityofPaloAlto.org

RE: Edgewood Plaza Project / 2080 Channing Avenue
Palo Alto File No. 08PLN-00157/10PLN-00198

Dear Ms. Lee:

The Woodland Creek Homeowners Association ("HOA") represents 90 residential homes located at 1982 West Bayshore Road, East Palo Alto, CA 94303 ("Woodland Creek"). The Board of Directors for the owners are writing to provide comments to the Draft Environmental Impact Report ("DEIR") for the above-referenced Edgewood Plaza Project ("Project"). We support the redevelopment of Edgewood Plaza and anticipate that Woodland Creek residents will be regularly traveling to and shopping at the plaza. However, while we appreciate that the City of Palo Alto ("City") has analyzed certain potential impacts of the Project, we are concerned that analysis and mitigation of the impacts of the Project on neighboring communities, specifically Woodland Creek, are deficient in several respects. In addition, as was brought to your attention at the October 26, 2011 public hearing, the DEIR fails to adequately address cumulative construction impacts and conflicts with the Palo Alto Comprehensive Plan.

We request that the City require study and mitigation of each issue identified in this letter. We would be happy to meet with staff and look forward to a constructive dialogue. L-1

I. About Woodland Creek

Woodland Creek consists of 90 one, two, and three bedroom homes located at 1982 West Bayshore Road, East Palo Alto, CA 94303. We are approximately half a mile north of the Project site, within both walking and biking distance. Built in 2002, Woodland Creek is bordered by San Francisquito Creek, West Bayshore Road, and Woodland Avenue. Our community includes seniors and many families with small children. The HOA is governed by a Board of Directors, and the property is managed by CJM Association Services, Inc. Our homes are fully occupied, primarily by owners.

II. Issues

A. Description of "Surrounding Land Uses" is Inadequate. Section 3.1.1.1 fails to include in its analysis Woodland Creek and other multi- and single-family dwellings to the north along West Bayshore Road (location illustrated on "Vicinity Map" attached as Exhibit A to this

letter). Section 3.1.1.1 should be revised as these communities will be affected by the construction and operation of the Project. L-1

B. <u>Lack of Safe and Convenient Pedestrian and Bicycle Access to Edgewood Plaza Endangers Pedestrians and Cyclists (Including Children), Will Increase Driving/Fuel Consumption, Conflicts with Palo Alto's Comprehensive Plan, and Without Mitigation Will Result in Significant Land Use and Energy Impacts.</u>

1. There is *no* safe and convenient pedestrian and bicycle access to Edgewood Plaza from the north along West Bayshore Road, and no such access is provided by the Project. The stretch of West Bayshore Road from the East Palo Alto/Palo Alto Border (San Francisquito Creek) to the Center is within the City's jurisdiction. This stretch of West Bayshore Road is hazardous for pedestrians and bicyclists because there is no sidewalk or bike lane. Creating safe and convenient pedestrian and bicycle access is necessary because there is a density of residential areas north of the Project site, and it is foreseeable that bicycle and pedestrian activity on West Bayshore Road will increase significantly once Edgewood Plaza is redeveloped, increasing the risk of accidents and injuries. This lack of pedestrian and bicycle access to the shopping center is inconsistent with City policy and the Project site's "Neighborhood Commercial" land use designation. The Woodland Creek community includes many families with small children. Without safe pedestrian and bicycle access, many will choose instead to drive to the Center, thereby increasing traffic on Palo Alto streets. L-2

3. To mitigate these significant negative impacts, the Project should include mitigation measures, including (i) construction of a sidewalk/bike lane along West Bayshore Road to connect the San Francisquito bridge sidewalk to the sidewalk bordering the Project site and (ii) installation of bicycle parking facilities at the plaza. L-3

4. Please note that the above concerns have been brought to the attention of the Project developer and the City staff in previous letters and public testimony, but have still not been addressed. In violation of the California Environmental Quality Act and City policy, the DEIR and the Transportation Impact Analysis (TIA) simply fail to adequately study the issue of safe and convenient pedestrian and bicycle access. L-4

5. Because the Project will foreseeably increase pedestrian, cyclist, and vehicle traffic along West Bayshore Road, the DEIR must address the following impacts.

a. *Land Use Impacts.* Section 3.1 identifies the following as important elements of the City's Comprehensive Plan but fails to note that the Project conflicts with each element: L-5

- "Safe and convenient access for pedestrian, cyclists, and vehicles" (p. 30): As noted above, there is no safe and convenient access for pedestrians and cyclists from the north.
- "Facilitate opportunities to improve pedestrian-oriented commercial activity within Neighborhood Centers" (Policy L-39, p. 32): As noted above, there is no safe and convenient opportunity for pedestrians to enter the plaza from West Bayshore Road.

Section 3.1 should be revised to identify and analyze the impacts of the lack of safe and convenient access for pedestrians and bicyclists and to set forth mitigation measures, such as the sidewalk/bike land and bicycle parking suggested above.

In addition, unless safe and convenient pedestrian and bicycle access is established, the Project conflicts with Policy T-14 (Improve pedestrian and bicycle access to and between local destinations, including public facilities, schools, parks, open space, employment districts, shopping centers, and multi-modal transit stations.) **L-5**

b. *Energy Impacts - Fuel for Motor Vehicles.* Section 3.3.3.4 inaccurately states that the "sidewalks, bike lanes and paths surrounding the site provide facilities for pedestrians and bicyclists." This section should be revised to accurately state that there is no safe or convenient pedestrian and bicycle access to Edgewood Plaza from the north along West Bayshore Road, and no such access is provided for by the Project. Therefore, unless such access is provided, the proposed Project *would* directly result in wasteful use of gasoline. **L-6**

6. Section 2.3.1.4 (p. 8) of the DEIR details car parking facilities but does not address bicycle parking facilities. The DEIR should specify how many bicycle parking structures will be available. **L-7**

7. The "Conceptual Site Plan" (DEIR, p. 14) indicates where trucks and cars will enter Edgewood Plaza, but does not indicate where cyclists and pedestrians will be able to enter the site. Please provide a revised site plan that illustrates the pedestrian and bicycle access points as well as bicycle parking facilities. **L-8**

C. <u>The DEIR and TIA Fail to Study Impacts on West Bayshore Road, Including Cumulative Impacts Relating to Concurrent CalTrans Construction Project Occurring Within One Mile from Project Site.</u>

1. The DEIR and Transportation Impact Analysis (TIA) fail to study the impacts of increased pedestrian, bicycle, and vehicle traffic on West Bayshore Road between Woodland Ave. and Embarcadero Road both during construction and operation. **L-9**

2. The DEIR and TIA fail to note that there is a major CalTrans construction project planned for 2012-2015 that will temporarily close sections of West and East Bayshore Road between the San Francisquito Creek bridge and the Project site. For reference, the CalTrans project is titled the "Route 101 San Francisquito Creek Bridge Replacement Project." Table 4.2 – 1 and Section 4.3.3 of the DEIR and the relevant sections of the TIA should be revised to reflect the CalTrans project and related cumulative construction impacts. **L-10**

3. The route and hours of operation of construction vehicles during the construction phase are not specified in the DEIR and TIA. Construction vehicles *should not* travel south from the University Ave. exit on West Bayshore Road, which is lined with residences with bedrooms facing the road (sensitive receptors). Please confirm that construction vehicles will enter the **L-11**

Project site via Embarcadero Road, then turn north into the Project site. Please specify the hours of construction. **L-11**

4. The DEIR indicates that during operation commercial trucks will enter the Project site via Embarcadero Road, then drive northbound on West Bayshore to approximately Channing Ave., then back into the loading dock (Section 2.3.1.4, p. 8). To avoid future confusion, the Project approval should include a condition that this will be the *exclusive* access route for commercial trucks approaching Edgewood Plaza. **L-12**

D. <u>The City Should Require Edgewood Plaza to Prevent/Mitigate Litter and Keep Shopping Carts Within the Shopping Center.</u>

If the redeveloped Edgewood Plaza has a supermarket and take-away restaurants, it is foreseeable that both litter and shopping carts (if removed from the shopping center) will have a negative impact on adjacent neighborhoods. The DEIR does not adequately address the impact of litter on the surrounding neighborhoods. The construction of fences to prevent blown litter is an inadequate mitigation measure. The shopping center should be required to pay for janitorial services to remove litter from the streets surrounding the Project site. The market tenant should be required to implement measures to prevent shopping carts from leaving the Project site (e.g., wheels that lock if removed from the premises). **L-13**

Please provide copies of all future notices, studies, reports, communications and the like regarding the Project to:

Woodland Creek HOA
c/o CJM Association Services, Inc.
Attn: Charlene Marquez
P.O Box 190, Pleasanton, CA 94566

With copy to: WoodlandCreekHOA@gmail.com

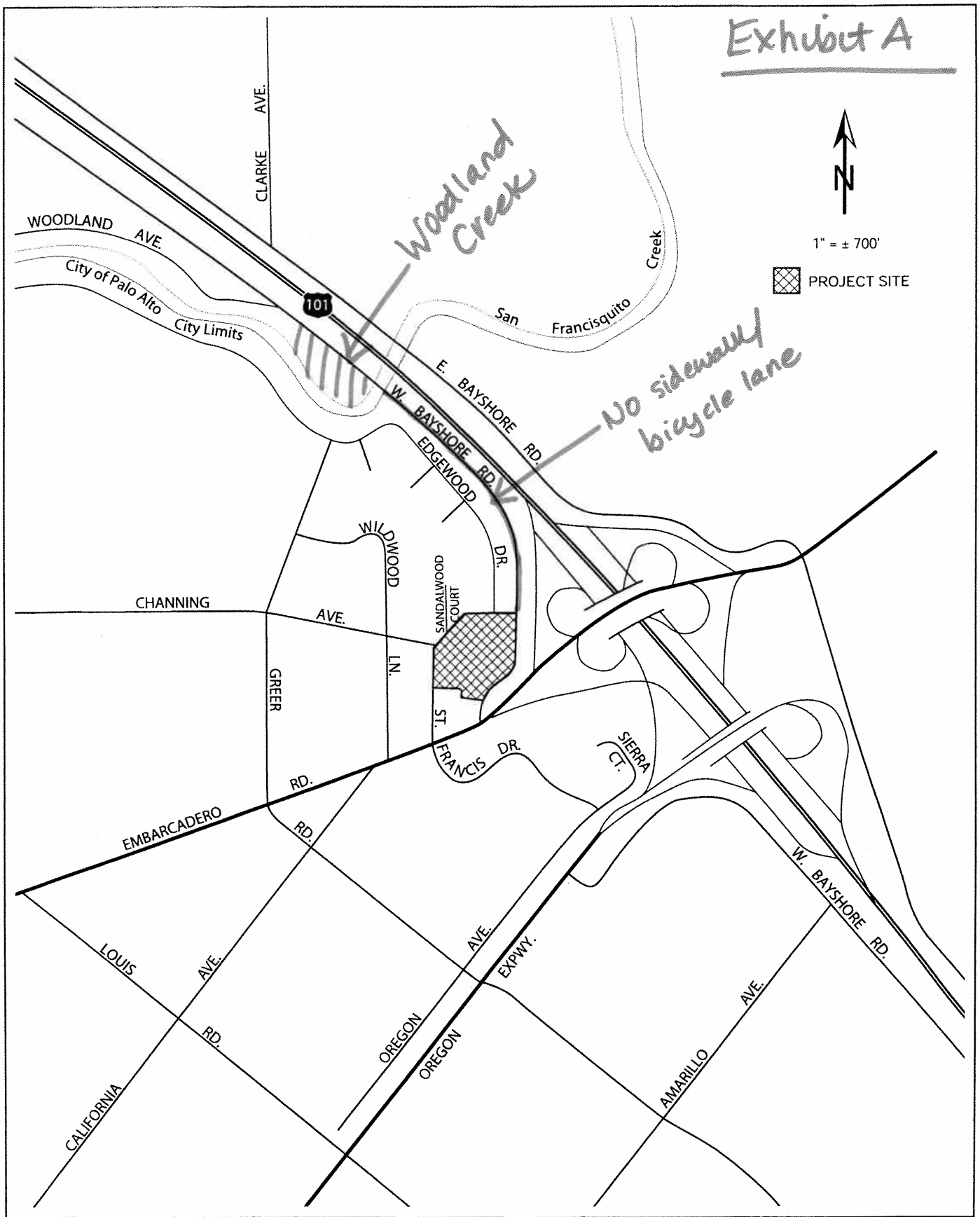
Thank you in advance for your consideration of and response to the above comments.

Sincerely,

Brenda Erwin
Digitally signed by Brenda Erwin
DN: cn=Brenda Erwin, o=Woodland Creek HOA, ou, email=WoodlandCreekHOA@gmail.com, c=US
Date: 2011.11.14 16:25:25 -08'00'

Brenda Erwin
President, Woodland Creek Homeowners Association

cc: Board of Directors, Woodland Creek Homeowners Association
CJM Association Services



VICINITY MAP FIGURE 2

L. RESPONSES TO COMMENT LETTER L FROM THE WOODLAND CREEK HOMEOWNERS ASSOCATION, DATED NOVEMBER 14, 2011.

Response to Comment L-1:

Please refer to Response G-2, above.

Response to Comment L-2:

Please refer to Responses G-6 and G-7, above.

Response to Comment L-3:

The lack of a sidewalk and bicycle lane on West Bayshore Road from Channing Drive at the northern edge of the project site to the San Francisquito Creek bridge sidewalk (approximately 0.3 miles) under existing conditions is not an environmental effect of the proposed project. Please refer to Responses E-2 (bicycle parking) and G-6, above.

Response to Comment L-4:

The transportation impact analysis (TIA) was conducted such that the potential impacts of the project were evaluated in accordance with the standards set forth by the City of Palo Alto and the Santa Clara Valley Transportation Authority (VTA) Congestion Management Program (CMP). The TIA is included as Appendix O of the Initial Study (Appendix C to the Draft EIR), and pedestrian and bicycle access impacts are discussed on pages 30-32 of the report. As noted in Response G-6, the adequacy of bicycle access to the site is assessed for this 3.58-acre mixed use redevelopment and text has been added to the EIR that acknowledges that bicycle lanes are not provided from all directions to the project site. The proposed project, however, would not substantially increase hazards due to a design feature of the project.

Response to Comment L-5:

The comment letter refers to the project's consistency with the Palo Alto Comprehensive Plan regarding bicycle and pedestrian access. The project, a renovation of an existing shopping center that is more than 50 years old, has adequate bicycle and pedestrian access, based on City of Palo Alto standards. Although the project does not propose to install a new bicycle lane or sidewalk along West Bayshore Road (a frontage road of U.S. 101), the project can still be accessed by bicycles from this direction. Overall, the project is adequately accessible for bicycle or pedestrians, and therefore is consistent with the policies described in the comment letter. Since the project does not result in a significant transportation impact to bicycle and pedestrian access, no mitigation measures are required.

Please also see Response G-7.

Response to Comment L-6:

Please see Response G-6.

Response to Comment L-7:

Please refer to Response E-2, above.

Response to Comment L-8:

Figure 4 of the Draft EIR shows retail driveway entrances, which may also be accessed by bicycles. Pedestrians would access the site on the sidewalks adjacent to these driveways, in addition to direct pedestrian access to the proposed park at St. Francis Drive and Channing Drive from surrounding sidewalks. Please also refer to Figure 16 (insert to Page 120 of Appendix C) in *Section 6.0* of this document.

Response to Comment L-9:

Please refer to Responses G-3 and G-6, above.

Response to Comment L-10:

Please refer to Response G-4, above.

Response to Comment L-11:

Please refer to Response G-5, above. Construction vehicles would be required to comply with the Palo Alto Municipal Code, including Chapter 18.23 (Performance Standards), Chapter 10.48 (Truck Routes), and Chapter 9.10 (Noise). Based on Chapter 9.10.060(b), construction shall be prohibited except between the hours of 8:00 a.m. and 6:00 p.m. Monday through Friday, 9:00 a.m. and 6:00 p.m. on Saturday, with a valid building permit.

Construction vehicles would likely enter the site from U.S. 101 and Embarcadero Road.

Response to Comment L-12:

Please refer to Response G-5, above. West Bayshore Road is an identified truck route in the Cities of Palo Alto and East Palo Alto, and trucks are permitted to depart the project site via this route.

Response to Comment L-13:

Please refer to Response G-10, above.

Edgewood Plaza DEIR comments
Holman

Section 3.2.4.1

Third paragraph states that “even if the grocery building was not found to contain historic building materials under the exterior cladding and eligible under Criterion A…” It would appear this is incorrect application of Criterion A as Criterion A deals with “Property is associated with events that have made a significant contribution to the broad patterns of our history.” with no reference to building materials. This is important as the conclusion in this paragraph is used in table 3.2-4 and elsewhere in the Cultural Resources portion of the DEIR. **M-1**

Similarly, CA Reg Criteria 1 is removed from reference just as Criteria A for National Register. This appears to be in error based on the description of both A and 1. **M-2**

Table 3.2-4

See comments above that appear to make the chart inaccurate in regards to Carey and Co determination of National Register eligibility under Criterion A. **M-3**

Section 3.2.4.2

Criterion 2 (persons)

The DEiR states that the Center buildings do not appear to have been associated with persons important to local, CA or National history and thus not significant under this criteria. There is no finding or rationale provided to indicate how this conclusion was reached.

Both Joseph Eichler and A Quincy Jones, even based on information provided in the DEIR itself on pages 35 and 38 would seem to indicate otherwise. Please explain how this statement can be made. **M-4**

Table 3.2-3

This table uses only the opinion of Page and Turnbull. Why is this table not a comparison of opinions at a minimum and, otherwise, why was not Carey and Co., as the independent peer review analysis used for this table? **M-5**

The DEIR is inadequate in that: **M-6**

• Page 56 states both Buildings 1 and 2 will be rehabilitated according to Sec Stds for Treatment of Historic Properties.

The description of the changes on Page 55 indicate numerous changes to Buildings 1 and 2 without provision of and reference to character defining features. E.g. but not limited to: roof rebuild: in what design, manner? beams between building removed and relocated, modifications to windows, walls, and doors, removal of the existing rafters and floating plane over the walkway, relationship between and among buildings on the site. **M-6**

• It further does not describe the difference between a new building with historic features applied to it as opposed to a rehabilitated building that retains it historic significance. **M-7**

• It dose not analyze the impact of the relocation of the marquis sign and the introduction of new signage of unknown design/form **M-8**

• While the Secretary Stds does allow for relocation of historic buildings, it does, as stated in the DEIR recommend against it. The DEiR does not adequately address the relationship of and location of the buildings as buildings on a single historic site. **M-9**

• It does not adequately address the inclusion of the new two story houses, as proposed in terms of describing impacts to the site: vehicular and pedestrian access to retail buildings, circulation, visibility of historic structures. **M-10**

• It does not adequately address the reconfiguration of the parking lot/s and elimination of entrances and access points to the site in relation to its original , historic dedsign. **M-11**

Edgewood Plaza DEIR comments (2)
Holman

Section 4.3.4

The traffic impacts are inadequately analyzed in that

• While there are differing opinions about how Palo Alto analyzes basis for traffic impacts (existing vacant land use which essentially Edgewood Plaza is presently vs occupied buildings as baseline) in this particular instance, there is need for particular care as there are going to be changes to 101 that do not seem to be considered in the 4-page discussion of cumulative impacts. **M-12**

• If memory serves from prior traffic analysis, the 101/Embarcadero/St Francis intersection was identified as one of the most dangerous on the Mid-Peninsula. (Traffic coming off 101 with a quick entrance into a shopping area, gas station, office building.) **M-13**

• The analysis does not look at the removal of two access points to the Center from the northern portion of the site and the resultant impact of forcing all vehicular traffic from neighborhood to enter and leave via access to Embarcadero and St Francis. **M-14**

• Additionally, I believe the delivery area along Bayshore Road is also accessible to visitors to the site. It appears it will be closed off in the new plan, further congesting the remaining two points of egress resulting in increased traffic at intersections. **M-15**

Additional comments re Cultural Resources:
Regarding the consideration of the site as a whole as opposed to individual buildings: since the project is a PC, there is requirement that the project be considered as a single site. **M-16**

Land Use:

Page 29 states the project will be reviewed by the ARB and thus will ensure the design compatibility of the new housing with the surrounding neighborhood. This lacks analysis of what is presented in the DEIR as design, scale, density, etc of the new housing. To indicate a future review will address potential impacts does not replace the need for analysis in the DEIR of known designs that may present impacts and compatibility issues. **M-17**

The consistency with the Comprehensive Plan sections only present the areas where the proposal may satisfy the Comp Plan but does not present those areas where there may be inconsistency. **M-18**

Analysis should also present a well-rounded perspective. One could point to Policy L- **M-19**

39, for instance, differently as there is removal of the two driveways that lead to the neighborhood, and the project closes off pedestrian opportunities from the north side of the site. Please provide a circumspective analysis.

M-19

Thank you.

From: Karen Holman [mailto:kcholman@sbcglobal.net]
Sent: Tuesday, November 29, 2011 12:12 PM
To: Lee, Elena
Cc: Williams, Curtis
Subject: Re: Edgewood Plaza DEIR comments

Thank you, Elena.

This is not really a comment per se but the mitigation measure for traffic at Wildwood....the description is lacking in clarity to me.
It is hard to understand from what direction the left turn lanes are intended to serve, for instance. If the consultant can better describe the mitigation, that would be good. **M-20**

Thanks.

Karen

From: Karen Holman [mailto:kcholman@sbcglobal.net]
Sent: Tuesday, November 29, 2011 12:02 PM
To: Lee, Elena; Williams, Curtis
Subject: Re: Edgewood Plaza DEIR comments

with apologies, I notice I made an error in one paragraph of my comments attached to this email yesterday.:

• If memory serves from prior traffic analysis, the 101/Embarcadero/St Francis intersection was identified as one of the most dangerous on the Mid-Peninsula. **M-21**

(Traffic coming off 101 with a quick entrance into a shopping area, gas station, office building.)

The correct reference should be to:

This stretch of West Bayshore as one of the most dangerous thoroughfares in California. This was identified in a Federally mandated study for a number of years running. While it may not be currently on that list, the Center has essentially been vacant for some time now. When it is fully occupied again, there seems to be rationale to consider the same conclusion could be reached. So to eliminate the northern access points to the Center and direct them to the only two remaining entrances (St Francis and West Bayshore) seem inadvisable and meriting additional analysis both in term so traffic counts and safety. M-21

Please advise if this corrected comment can be added as part of my comments.

Thank you much.

Karen

M. RESPONSES TO COMMENT LETTER(S) M FROM KAREN HOLMAN, COUNCIL MEMBER, PALO ALTO CITY COUNCIL, DATED NOVEMBER 28, 2011.

Response to Comment M-1:

To clarify, even if the grocery building does not contain historic building materials under the exterior cladding, Carey & Company is of the opinion that that the grocery store's basic form is intact (i.e., feeling, association, setting, and location) and the entire site could be eligible as a historic district under Criterion A of the National Register of Historic Places (NRHP) The text of *Section 3.2.4.1* and Table 3.2-4 in the EIR have been revised for clarification, please see the revisions in *Section 6.0* of this document.

Response to Comment M-2:

Criterion A is an eligibility criterion for the NHRP and Criteria 1 and 3 are eligibility criteria for the California Register of Historical Resources (CRHR). *Section 3.2.4.1* describes the eligibility of the Edgewood Plaza for the National Register of Historic Places, and the eligibility for the Edgewood Plaza for the California Register of Historical Resources is described in *Section 3.2.4.2*, on page 49 of the Draft EIR. As noted in Response M-1 above, Table 3.2-4 (which summarizes the eligibility discussions in the EIR) has been revised to clarify the expert opinions of the two historic resources consultants.

Response to Comment M-3:

As noted above in Responses M-1 and M-2, please see the revisions to Table 3.2-4 in *Section 6.0*. Carey & Company consider the site as a whole eligible for listing under both the NRHP and the CRHP.

Response to Comment M-4:

The discussion of Criterion 2 (Persons) in this section of the EIR is based in large part upon the evaluation by Page & Turnbull, who found that the Edgewood Plaza Shopping Center does not appear to have been associated with the lives of persons important to local, California or national history and was not significant under this criterion (Page & Turnbull, *Historic Resource Study, Edgewood Plaza Project*, September 2009, page 41.)

Carey & Company's original determination of eligibility under National Register Criteria A and C and similar California State Criteria 1 and 3 as a part of their November 2010 peer review (Initial Study Appendix D, in Appendix C of the EIR) does not imply that Criterion 2 (Persons) is invalid. Carey & Company considered this criterion, but felt that the stronger and more appropriate case was made by using Criterion 1 (events) – the site as a surviving example of a nationally implemented urban design theory, and Criterion 3 (the work of a master) – which implicitly includes both Joseph Eichler and Quincy Jones as persons, but specifically in the context of their work. In determining the appropriate Criteria, Criterion 3 is generally geared toward architects, engineers, and urban designers (e.g., Jones & Eichler). Criterion 2 is reserved for those outside the realm of Criterion 3, who have had an impact on society such as labor leaders (e.g., César Chávez), industrialists or tech moguls (e.g., Henry J. Kaiser or Steve Jobs), elected officials (e.g., President Hoover) or celebrities (e.g., Elvis Presley).

Please see the text revisions to page 49 of the Draft EIR in *Section 6.0* of this document, which clarifies the discussion of Criterion 2.

Response to Comment M-5:

Carey & Company was tasked with completing peer review, and did not address the seven aspects of integrity in as much detail as the Page & Turnbull evaluation (refer to Appendix C of the Initial Study, pages 42-47). Carey & Company's opinion on the integrity of the three retail buildings on the Edgewood Plaza site, although not identified in Table 3.2-3, is summarized on page 53 of the Draft EIR in Table 3.2-4. Carey and Company concurs that Buildings 1 and 2 retain architectural integrity and the grocery store building lacks integrity.

Response to Comment M-6:

The text on page 56 of the Draft EIR has been revised. Although the applicant proposed to rehabilitate Buildings 1 and 2 to *Secretary of Interior Standards and Guidelines for the Treatment of Historic Properties*, this would not be feasible if Building 1 is moved and the site is no longer eligible for listing as a National or California historic resource. Also, as noted in the discussion on page 57 of the Draft EIR, the project would not comply with the Secretary of Interior's Standard 2 in terms of spatial relationships. The text change would not alter the significance conclusions on pages 57 and 60-61 of the Draft EIR.

Character-defining features are cited in more detail starting on page 26 of the Page & Turnbull report (Appendix C of the Initial Study). Building features are named and categorized as contributing and non-contributing. The majority of this information is also graphically presented on pages 27-39 of the Page & Turnbull report.

Response to Comment M-7:

The EIR evaluates the impacts of the proposed project. The project does not propose to replace Buildings 1 and 2 with a new building.

Response to Comment M-8:

Please see Response I-1, above.

Response to Comment M-9:

While the Standards open the possibility for relocation, approved relocations historically are an action of last resort where resources are at risk, such as demolition due to highway construction. Relocations are generally not approved as a matter of design convenience. The Draft EIR describes Carey & Company's opinion on the relationship of the buildings from a site perspective on page 57.

Response to Comment M-10:

The impact of adding the residential units to the site on views and pedestrian and vehicular access to the Edgewood Plaza buildings is discussed on pages 57-58 of the Draft EIR, and the comment does not specify what would be considered inadequate in this description.

It should be noted that the change in pedestrian access, while contributing to the change in views of the historic buildings, would not result in a significant impact from a transportation perspective. Pedestrian and bicycle access to the site following development of the proposed project would be adequate to serve the proposed uses. Vehicular and pedestrian access to the retail building and

circulation on the site is addressed on pages 119-120 of the Initial Study (Appendix C to the Draft EIR). A figure that illustrates the description of the proposed pedestrian access to the site has been added to the EIR. Please refer to Figure 16 (insert to Page 120 of Appendix C) in *Section 6.0* of this document.

Response to Comment M-11:

Please refer to Response M-10, above. As described on page 58 of the Draft EIR, the impact of the parking lot alterations is part of Carey & Company's evaluation of effects on the site design as a whole, and not just the individual buildings. Modifications to the overall site design constitutes one of the identified impacts to historic resources.

Response to Comment M-12:

It is not clear in this comment what changes to U.S. 101 are being referred to. The impacts to freeways, including U.S. 101, are discussed in *Section 4.16.2.2* of the Initial Study (Appendix C to the Draft EIR), as well as in the Transportation Impact Analysis (Appendix O to the Initial Study). As discussed in Response C-1, the proposed development project would not add traffic equal to at least one percent of the freeway segment's capacity and based on Santa Clara Valley Transportation Authority (VTA) Congestion Management Program (CMP) guidelines and City of Palo Alto methodology, further evaluation of project or cumulative impacts is not required as the project would not contribute enough new trips to make a substantial contribution to a cumulative freeway impact.

Response to Comment M-13:

The comment may be referring to the Federal Highway Administration, *Highway Safety Improvement Program 5 Percent Report*. The 2007 report identified the segment of West Bayshore Road near the project site as having more than three fatal or severe injury collisions from 2003 to 2005.[3] West Bayshore Road was not identified as an area of concern in the 2010 version of the *Highway Safety Improvement Program 5 Percent Report.*[4] Palo Alto Police Department accident records from the period 2003-2008 indicate that the incidents that resulted in the collisions of concern were alcohol-related.

Although West Bayshore Road was identified by this report in previous years, no safety impacts resulting from project circulation and access have been identified by the traffic report prepared by the City's traffic consultant for this project. There is no evidence that elimination of the access points on the northern side of the center would have any effect on safety of this segment of West Bayshore Road, based on the projected traffic volumes resulting from the project.

In addition, the project includes a change to the West Bayshore Road-Embarcadero Road intersection, so that left-turns from West Bayshore Road onto Embarcadero Road would be prohibited following project development, which would improve traffic safety at this intersection. As noted on page 114 of the Initial Study (Appendix C of the Draft EIR), this modification is proposed because the left turn from West Bayshore Road is difficult due to heavy volume and high speeds on Embarcadero Road.

[3] Federal Highway Administration, Highway Safety Improvement Program 5 Percent Report. 2007. http://safety.fhwa.dot.gov/hsip/fivepercent/2007/index.cfm?state=ca.
[4] Federal Highway Administration, Highway Safety Improvement Program 5 Percent Report. 2010. http://safety.fhwa.dot.gov/hsip/fivepercent/2010/index.cfm?state=ca.

Response to Comment M-14:

The access points that have been eliminated are the existing northern access points in the area that is proposed for residential uses, and one access point off West Bayshore Road. The loss of these access points does not represent a significant transportation impact, and the transportation impact analysis has found retail access to be adequate.

The impacts to site access and circulation are discussed in *Section 4.16.2.4* of the Initial Study on pages 119-120 (Appendix C to the Draft EIR), as well as in the Transportation Impact Analysis, Appendix O to the Initial Study.

Response to Comment M-15:

The driveway to the loading dock off West Bayshore Road would be designated for delivery trucks and employee parking. Under the existing site plan, this area is also used for delivery trucks and loading, and not as a primary circulation route for visitors. Although the number of access points is changing, the amount of traffic anticipated from the project is not expected to cause ingress or egress problems at the proposed project driveways.

Response to Comment M-16:

The Council Member's comment on the consideration of the site as a whole is acknowledged. The federal, state, and local criteria for consideration of the site as a historic resource, however, are independent of the criteria for consideration of the site for a Planned Community zoning. Under the CEQA guidelines, the site may be considered as a whole (or separately) related to its historic resources regardless of the underlying zoning district, entitlements, ownership, or Comprehensive Plan designation.

Response to Comment M-17:

As stated in the comment, the Draft EIR describes land use compatibility of the project with the surrounding neighborhood, based on plans that were available at the time of preparation of the Draft EIR. The comment does not specify what is inadequate in the land use compatibility discussion in the Draft EIR. Following the circulation of the Draft EIR, the Architectural Review Board reviewed the project design on November 3, 2011, and asked the applicant for design changes to the project, which was reviewed at a subsequent ARB meeting on February 2, 2012. The ARB recommended approval of the project at that meeting.

The PTC and City Council will have an opportunity to review the revised plans for the site. The ARB review is noted in the EIR as some design details, such as placement and selection of lighting fixtures to avoid spillover onto adjacent properties or placement of individual windows to avoid visual intrusion of adjacent residences, are appropriately reviewed and confirmed by the ARB, in conformance with City of Palo Alto guidelines and standards.

The visual and aesthetic resources at the site are also discussed in *Section 4.1, Aesthetics*, of the Initial Study (Appendix C to the Draft EIR), and the compatibility of the historic resources on the site with the proposed residential units is discussed in the Draft EIR, *Section 3.2.5.3, Impacts to Historic Resources.*

Response to Comment M-18:

The consistency of the proposed project with the Comprehensive Plan is discussed in several policy discussions, particularly those related to historic resources. As noted in Response I-2, a summary of Comprehensive Plan policy discussions in the EIR has been added as Appendix D of the EIR (please see *Section 6.0* of this document).

Response to Comment M-19:

The project is not substantially reducing pedestrian access, and would not result in an impact from removal of pedestrian access from the north of the site. The project, therefore, appears to be consistent with Policy L-39.

Response to Comment M-20:

The following is a restatement of **MM-TRANS-1.1** on page 117 of the Initial Study (Appendix C of the Draft EIR).

> A two-way left turn lane will be extended from the existing left turn pocket on eastbound Embarcadero Road at Saint Francis Drive to Wildwood Lane to the west. This will facilitate outbound left turns from Wildwood Lane to Embarcadero Road and reduce left turn delay, which would reduce the project impact to this unsignalized intersection to a less than significant level.

Response to Comment M-21:

Please refer to Response to Comment M-13, above. The proposed project driveways on West Bayshore Road would have adequate sight distance and would not create a new operational traffic safety impact for motorists. As noted in Response M-13, the project would modify the West Bayshore Road-Embarcadero Road intersection, prohibiting left turns from West Bayshore Road onto Embarcadero Road. This modification is proposed, in part, to improve traffic safety due to heavy volume and high speeds on Embarcadero Road. The increase in traffic volumes on West Bayshore Road resulting from the project, therefore, would not create or worsen an operational traffic safety impact in this area.

SECTION 5.0 RESPONSES TO VERBAL COMMENTS RECEIVED ON THE DRAFT EIR

Verbal comments and questions on the Draft EIR were recorded at a public hearing of the City of Palo Alto Planning and Transportation Commission on October 26, 2011. Comments were provided by the public and Planning and Transportation Commissioners. Individual comments are noted and numbered on the transcript of the public hearing on the following page. Responses that correspond to the numbered comments are provided after the transcript of the public hearing.

PLANNING& TRANSPORTATION COMMISSION MINUTES

==========MEETINGS ARE CABLECAST LIVE ON GOVERNMENT ACCESS CHANNEL 26==========

Wednesday, October 26, 2011
6:00 PM, Council Chambers
1st Floor, Civic Center
250 Hamilton Avenue
Palo Alto, California 94301

ROLL CALL: 6:05 pm

PTC Commissioners:	***Staff:***
Eduardo Martinez – Chair	*Curtis Williams, Planning Director*
Susan Fineberg – V-Chair - absent	*Donald Larkin, Sr. Assist. City Attorney*
Daniel Garber- Acting V-Chair	*Amy French, Current Planning Manager*
Samir Tuma	*Elena Lee, Senior Planner*
Lee Lippert	*Zariah Betten, Admin. Assoc. III*
Arthur Keller - Absent	
Greg Tanaka	

AGENDIZED ITEMS:

1. **2080 Channing Avenue**: Public hearing to accept comments from the public and the Commission related to the adequacy of the Draft Environmental Impact Report (DEIR) prepared for the request by Sand Hill Properties for a Planned Community proposal for the Edgewood Plaza Shopping Center for the renovation of the three existing Eichler retail structures, on-site relocation of one of the retail structures, construction of 10 new single-family homes, and creation of a 0.22 acre park. Environmental Assessment: An Environmental Impact Report has been prepared. Zone District: PC-1643.

Approval of Minutes of September 14, 2011

Chair Martinez: October 26, 2011 meeting of the Palo Alto Planning and Transportation Commission. Secretary to the Commission Betten please call roll.

ORAL COMMUNICATIONS. Members of the public may speak to any item not on the agenda with a limitation of three (3) minutes per speaker. Those who desire to speak must complete a speaker request card available from the secretary of the Commission. The Planning and Transportation Commission reserves the right to limit the oral communications period to 15 minutes.

Chair Martinez: Thank you. We'll begin this evening with what is known as Oral Communications where members of the public are encouraged to speak on items that are not on the agenda. You are given three minutes to speak. During the last minute the yellow light will come on warning you to bring your comments to a close and we have several speakers tonight. Vice-Chair Garber please read them in order.

Vice-Chair Garber: We have four speakers this evening. John Morris to be followed by Ben Linder then Vanessa Davies and Tench Coxe. Mr. Morris.

Mr. John Morris: Thank you. Good evening. I feel the need to express my continuing frustration regarding AT&Ts unchanged design for their proposed residential cellular transmitters. On August 4th our city's Architectural Review Board made it clear to AT&T that they needed to see two or three design options in order to proceed any further with a decision on AT&Ts proposal. In September, AT&T provided the city with a new proposal which includes designs that appear to be exactly the same as what was previously rejected by the ARB. Where are the new design options that the ARB instructed AT&T to provide?

The reason the ARB rejected the original design is because they objected to it esthetically. In a word, the design is ugly. Should it be any surprise to AT&T that there is now an even larger number of residents that find that same design to continue to be ugly? It was ugly then, it is ugly now and will continue to be ugly as long as AT&T stonewalls the city and its residents with the same ugly design. I know that many residents have written letters to city and AT&T representatives. I'd like to know how and what the actual response rate has been. My household has been waiting for an answer to our design option question from Clear Campbell and the Planning Department since September 29th. We finally received a letter of apology from AT&T last week stating they were having difficulty responding to all of the letters they received from residents. I have to assume that the various city departments involved have merely been forwarding resident's written inquiries to AT&T hoping AT&T would respond in a responsible manner. All I can say is we're still waiting for the design options and how many transmitters, really. First nine, now twenty, then sixty more, as is proposed. Then what? How many?

Is one ugly? Is sixty ugly? Is 120 ugly? Is 400 ugly? It seems to me that if the design is esthetically unacceptable then there needs to be a design change and we're looking forward to improving cellular reception in our city, absolutely, but not with this design. Thank you.

Vice-Chair Garber: Ben Linder to be followed by Vanessa Davies.

Mr. Ben Linder: Hi my name is Ben Linder. I live at 1650 Waverly Street. My across the street neighbors, John and Cynthia Gunn and my next door neighbor Fabio Rosati all will look quite directly at this lovely AT&T distributed antenna system tower that is slighted to go in front of our house. My point, and I will answer John's question about how many, but AT&T wants to put up 80 towers in our city. Because they are claiming this is a public right of way therefore they don't need your permission. The only permission they need is the ARBs permission. This city will not be able to discriminate against the other four carriers in the area.

So let's just assume all five carriers, Verizon, Sprint, Metro PCS, T-Mobile, they'll all want 80 towers also. We'll have 400 towers in the city and then we'll have some alternative carrier who may want to provide other services for us who will also argue that they should be allowed to put things on top of our electrical poles. So the problem we have is that without a master plan, without logical planned out way to deploy this technology through the city we are going to have chaos. Not only are we going to have chaos, but potential liability because everyone is going to want to put antennas on our light poles because of this precedent.

I represent a group called Palo Alto Citizens for a Responsible Wireless Plan. Over 120 Palo Alto residents have signed this petition which I will give the secretary to enter into the record. I will read it: Please halt the construction of the AT&T DAS system and create a wireless master plan. Halt the construction of the DAS system. The citizens of Palo Alto demand a responsible and deliberate plan to provide us with the best possible wireless service while preserving the character of our neighborhoods. We live in a city where we need this building's permission to chop down 20% of an Oak tree. We should take the time and effort to find the right technology, the right way to deploy it, and to find the right way to deliver excellent service to all the residents of Palo Alto without a chaotic deployment of these antennas. Very short sided and chaotic deployment not to mention ugly and noisy given the information AT&T has provided us. Thank you very much.

Vice-Chair Garber: Thank you. Vanessa Davies to be followed by Tench Coxe.

Ms. Vanessa Davies: Thank you. If my neighbor wanted to remodel his or her home and put an ugly and noisy parched monstrosity in their front yard I'd have a significant say on what they could or could not do if it impacted my home yet AT&T announced they want to place a humming antenna 40 feet from my home and it appears they are on the fast track for approval.

I've yet to hear from anyone associated with the city why it appears that they are valuing corporate interests over their residents. I understand that some of the City Council and commissions believe we don't want to fall back in technology. We're Silicon Valley so we should be on the cutting edge but there is nothing new about this DAS antenna technology. All it is is the current technology on a much more intrusive scale. AT&T has stated there are no better options for the city and it appears everyone has taken their word and their paid consultants. This is a fact.

There are no technical reasons why additional antennas cannot be placed in commercial areas. It's simply a financial matter for AT&T. If the cities insists they be placed in commercial areas as is the case now AT&T will abide and will just cost AT&T a bit more to set it up, that's all. These noisy and ugly antennas do not belong perched over residential homes. They belong in the many commercial areas available in Palo Alto. Thank you.

Vice-Chair Garber: Thank you. Our final speaker, Tenche Coxe.

Mr. Tenche Coxe: Hi my name is Tenche Coxe and I've been in the venture capital business in Palo Alto for the last 25 years and I've done a lot of telecommunications investing. I'm here to talk about this DAS system at well. You may already know this but these antennas are quite obtrusive. On top of 80 telephone poles AT&T is asking to put these systems, their 9 feet tall, 7 feet across with 2 five gallon essentially dipole antennas spread on either side and then beneath them would be the equipment that has the fans at 12 feet up from the street. The length from here is 12 feet of equipment and it's about 6 inches thick here. This about 12 inches thick so their quite large. I got into this because I got one of these notices that said they're coming. It is 80 proposed antennas and the reason I'm here in addition to the fact that they're ugly is I am in the venture capital industry and I see Wi-Fi coming. Cisco, Erickson and a bunch of start-ups are about to obsolete the technology AT&T wants to put on those telephone poles using Wi-Fi and I just think it will be a real shame because when I first moved to Palo Alto I lived in Southgate and I remember what a great thing it was when we succeeded in getting that power

underground. I realize the city has huge budget challenges but I do think we still have a goal in the long run of undergrounding power and I think that putting these DAS systems on top of these telephone poles goes exactly against that goal and moreover the real issue to me, I don't understand, I think we can all save AT&T a lot of money. These are truly going to be obsolete in a couple of years.

I got a quote here from the CTO at Cisco who said the other day that Wi-Fi service will become a much more valuable tool for wireless carriers in the coming year as they work to make connectivity more seamless and ubiquitous according to Cisco Systems Wireless Technology Chief Bob Friday.

I know this stuff because I'm living it. I'm on the board of companies that are enabling it. Two-thirds of calls originate in homes or businesses or places where there is Wi-Fi and the technology for making it seamless and roamable so you can use it in your car is imminent. The issue with Wi-Fi or the beauty is it's the size of a shoebox but they're a hundredth of the cost of a DAS system. There are cities all over the world that are now deploying Wi-Fi meshed Wi-Fi networks and they don't have any 3G or 4G or DAS. They are just using meshed Wi-Fi networks and places like Bangalore have perfect coverage so I'm thinking to sum up I just want to let you guys know that we're going backwards and we shouldn't let this thing happen.

1. **2080 Channing Avenue [10PLN-00198]**: Public hearing to accept comments from the public and the Commission related to the adequacy of the Draft Environmental Impact Report (DEIR) prepared for the request by Sand Hill Properties for a Planned Community proposal for the Edgewood Plaza Shopping Center for the renovation of the three existing Eichler retail structures, on-site relocation of one of the retail structures, construction of 10 new single-family homes, and creation of a 0.22 acre park. Environmental Assessment: An Environmental Impact Report has been prepared. Zone District: PC-1643.

Chair Martinez: Thank you all. We cannot comment on items that aren't agendized but I want to let you know we appreciate you coming forward. We have one agenda item for this evening, 2080 Channing Avenue, also known as the Edgewood Plaza to receive public testimony on the draft Environment Impact Statement and with that I will open the public hearing and for a brief overview from staff.

Ms. Elena Lee, Senior Planner: Thank you Chair and Commissioners. The item before you tonight is a public hearing to accept public and commission comments on the draft EIR and prepare for the request for planned community rezoning. Following staff presentation the City's EIR Consultant, Judy Fenerty of David J. Powers and Associates will make a short presentation that will also be followed by the City's Historic Consultant, Charlie Duncan from Carey and Company. Also here tonight is a representative for the Historic Resources Board, Scott Smithwick to summarize the HRB's recommendations from the October 19th hearing held on the project and the EIR.

The project is also scheduled for formal review by the Architectural Review Board on Thursday, November 3rd, 2011. The purpose of tonight's hearing is to solicit and receive comments regarding the EIR at a public hearing and assist the City to prepare responses for the final EIR as required by the California Environmental Quality Act. A subsequent hearing on the project itself

following the HRB hearing and recommendation on November the 3rd will return to the Commission along with the EIR for a formal hearing and recommendation to the City Council.

The Planning Commission hearing is tentatively scheduled for November 30th. The draft Environmental Impact Report was released for a 45 day circulation period per the requirements of the CEQA on September the 30th through November 14th, 2011. Ms. Fenerty will discuss the process. Comments are requested no later than the close of business on November the 14th to allow adequate time for the preparation of the final EIR. The draft EIR identified ten impacts with mitigation measures which will reduce them to a less than significant level. Those impacts consist of archaeological or paleontological resources, air quality, biological hazardous materials, hydrology and water quality along with noise and transportation resources. The DEIR identified three significant unavoidable impacts for cultural resources related to the two buildings and the shopping center as a whole as it relates as a historic resource.

Although mitigation measures were identified the impacts were not reduced to a less than significant level. Certification of the EIR would require adoption of overriding considerations. As stated earlier, the EIR and the project were heard by the HRB on October 19th. The Board found that the EIR adequately addressed historic impacts and recommended approval of the project. The Board also recommended that the DEIR be amended to reflect their assessment that with the addition of the mitigation measures such as compliance with the Secretary of Interior Standards for Rehabilitation that the historic resource impacts have been reduced to a less than significant level. Some members of HRB also expressed that mitigation measures to require the Historic American Building Survey and the Eichler display were not necessary.

At the time of preparation of the packet and included in your packet are two comment letters received regarding the draft EIR. Responses to all comment letters received will be included in the final EIR. One of the letters was a no comment letter from the Santa Clara County Department of Environmental Health and a second letter was received from a member of the public which is included in the packet. A third communication was received from the Department of Toxic Substance Control requesting a copy of a subservice investigation report.

The letter from the member of the public which will be addressed in depth in the final EIR expressed concerns primarily about parking and specifically about parking at the adjacent building at 1101 Embarcadero Road which is not actually part of this project. As indicated in the Staff Report analysis about parking and transportation has been completed for the project and there was only one impact identified which would be reduced to a less than significant impact related to traffic. The project proposed is to provide 156 parking spaces in two tandem stalls and as discussed the property is also subject to recorded easement for the benefit of that adjacent office building referenced in the letter. The easement requires a provision of 16 non-exclusive parking stalls and access for use by the occupants of the adjacent building. The 156 or 158 counting the two tandem spaces includes the 16 non-exclusive parking stalls per the agreement. The project is therefore providing the required parking stalls per the municipal code.

Detailed discussion about parking will be provided with a formal hearing on the project on November the 30th. Next to speak is Judy Fenerty of David J. Powers followed by Charlie Duncan of Carey and Company and then followed by the HRB Board Member Scott Smithwick. Thank you.

Ms. Judy Fenerty, David Powers & Associates: Good evening Commission Chair and Commissioners. My name is Judy Fenerty and I am a Project Manager with David J. Powers and Associates. Our firm is assisting this lead agency of the City of Palo Alto with preparation of an Environmental Impact Report for the Edgewood Plaza Project at 2080 Channing Avenue. This evening I am going to provide an overview of the purpose of preparing an EIR and the steps in the EIR process. The California Environmental Quality Act or CEQA was adopted in 1970 with the purpose of ensuring decision makers such as the Planning Commission or City Council consider the environmental consequences of their actions. The Edgewood Plaza Project Environmental Review was initiated first in 2008. Because their was evidence that the project could result in a significant effect on the environment that would not be reduced to a less than significant level with the mitigation proposed, an environmental impact was prepared.

The purpose of preparing and Environmental Impact Report is to provide information and objective analysis to the public and decision makers of the environmental consequences of the proposed project. An EIR provides responsible agencies and the public with detailed information of the effects of a proposed project and identifies ways in which the significant effects might be minimized and identifies alternatives to a project that could avoid or reduce the significance of those environmental impacts.

An EIR describes the environmental effects of the project and is not a document that advocates for approval or denial of a particular project. How are these environmental effects defined? For the purposes of CEQA the environmental means the physical conditions that exist within the area that will be affected by a proposed project. These conditions include land, air, water, plants, wildlife, noise and objects of historic or cultural significance or esthetic significance.

A number of steps are required as part of the environmental review or CEQA process. In the case of the Edgewood Plaza Project a draft initial study was first prepared to focus the EIR on the effects determined to be significant. Following that, a Notice of Preparation of a Draft EIR was prepared and circulated to responsible agencies and the public. The Notice of Preparation requests a response on the scope and content of the environmental information to be included in the draft EIR. This process assists the lead agency with defining the scope of the analysis. For the Edgewood Project a Notice of Preparation draft EIR was sent out to the city in February 2011 for 30 days.

The next step is preparation of the draft EIR itself. Draft EIR includes an evaluation of environmental effects of a proposed project based on project plans and project information submitted to the city by the project applicants. Draft EIR includes discussions of individual subject areas and assessment whether the project would result in a significant impact under CEQA that is evaluated based on the city's threshold of significance listed in each section.

The Edgewood Draft EIR began circulation on September 30th for 45 days and circulation will end on November 14th. In addition to describing the existing environmental setting of the project area and the environmental impacts of a proposed project the draft EIR would also include a discussion of mitigation measures that could reduce those impacts based on the city's thresholds of significance. The EIR also includes a discussion of the consistency of the proposed project with programs and plans such as the city's Comprehensive Plan and Zoning Ordinance and also includes identification of alternatives to the project.

The purpose of the alternative section is to determine whether there are alternatives of design, scope and location that will substantially lessen identified significant impacts while meeting most of the basic objectives of the project. This draft EIR of the Edgewood Plaza Project describes two significant historic resources impacts. The first one is the relocation of retail building 1 and the marquee sign for Edgewood Plaza which would alter the overall site design and characteristics of the plaza. The other one is construction of ten new single family houses which would also alter the overall site design and characteristics of the plaza.

Significant environmental impacts for Edgewood Plaza that were identified as being reduced to a less than significant level with mitigation measures include a subsurface or buried cultural resources, construction impacts to air quality, water quality and nesting raptors. Hazardous materials impacts during construction activities, ambient noise levels and operational noise, flooding risks and a traffic impact at one unsignalized intersection. In addition, Conditions of Approval are described in the draft EIR to further reduce less than significant construction impacts to trees and impacts from construction noise. The draft EIR once completed is generally required to circulate for 45 public review period. During the review period, agencies and the public may submit comments on the analysis and the draft EIR to the city. Comments to the draft EIR can be submitted in writing and for this project the city is also taking verbal and written comments in the contents of the draft EIR at this Planning and Transportation Commission meeting.

Upon completion of the public comment period which will be on November 14th, the next step in the Environmental Review Process is preparation of written responses to comments in the draft EIR where the responses to comments make important changes to the information provided in the text of the draft EIR text revisions are made. The responses to comments and any text revisions are incorporated into a final EIR document which is circulated for a minimum of ten days prior to any action on the proposed project. The draft EIR and responses to comments which together constitute the final EIR are considered by the Planning and Transportation Commission and the City Council prior to project approval.

Before project approval the final EIR must be certified. Certification of the EIR is the adoption of a resolution by the City Council that the EIR has been completed in compliance with CEQA and that the final EIR reflects the lead agency's independent judgment and analysis. Please note that certification of the draft EIR is not the same thing as project approval.

In addition to submitting written comments on the draft EIR during the public circulation period which is currently underway, the public can also provide comments to decision makers regarding the final EIR at a hearing or hearings on certification of the EIR. Comments submitted after the November 14th close of circulation may not receive written responses. That completes my overview of the purpose of the EIR and the CEQA process. The last slide is a calendar of schedule of where we are currently and what meetings have been scheduled going forward. Thank you.

Chair Martinez: Thank you. Before we go further I just want to let the public know that if you care to speak on this item, there is a speaker card at the back of the room to be filled out and there's still time to turn them in if you wish to speak. I think they're on the table. Thank you.

Vice-Chair Garber: Staff was there a second speaker for the applicant?

Mr. Charlie Duncan: Good evening Chair Martinez and Commissioners. My name is Charlie Duncan. I'm an Architect with Carey and Company. My city of residence of Richmond, California where I am the Chairman of the Planning Commission so it's instructive to be on the other side of the dice tonight. I'll be brief. I don't think there's a lot to say however at the onset…

Ms. Fenerty: Sorry if I may, I wanted to clarify that Charlie represents part of the City's consultant team, not the applicant consultant team.

Mr. Duncan: We were the contributors to the cultural resources chapter in your EIR. At the outset there was a difference of opinion as to the historicity of the site between Page and Turnbull who is the applicant's preservation architect and Carey and Company which is the city's consultant. Paige and Turnbull viewed the site as a group of three buildings, objects, and made their analysis on that basis. However, when we walked the site it was very apparent to us that it wasn't the architecture of the buildings, but it was the siding and the location and the spatial relationships between those buildings that made the site significant because it was a very fine example of post war suburban American planning and not only did it extend across the site itself beyond the building but into the neighborhood because there is an Eichler neighborhood beyond. They are all connected.

So our analysis in the EIR had to do with not only the buildings but the broader context having to do with the site. As it panned out, I think the EIR as its been written with mitigation measures encompasses those two opinions, acknowledges them. I think the analysis is accurate, it's been handed and I think you have all the tools you need to make a decision. Especially with impact CR2 and CR3 which are significant unavoidable impacts which will automatically assume that the overriding consideration and process is engaged if we move forward with this project but I believe the EIR is complete and you have the tools you need to make the decision and recommend to City Council. I can answer any questions if you like.

Chair Martinez: I believe we're going to hold our questions until the end.

Mr. Scott Smithwick: Good evening. My name is Scott Smithwick. I am a member of the HRB since this past May. I am also an Architect by profession and I'm here as the HRB's representative. The report that staff has outlined for you summarizes our Board's discussion last week but I just wanted to recap it for you. Our Board, just to let you know, voted six to one in favor of this project and the majority of our Board felt that the EIR was done very well but we felt that the relocation of building 2 with the plan that Page and Turnbull had put into place in the documents that we reviewed was entirely appropriate and met the Secretary of Interior standards and because of that, we felt that the project should be approved with less than significant impact.

While we agreed with Carey and Company that the site is important, it is a good early example of suburban planning. We also felt that just because something is old, original and intact didn't necessarily make it a good design or successful design and we feel very strongly that the relocation of building 1 is extremely important for this project to be viable in today's world from the site planning standpoint and to achieve the applicant's goals. We are also very, very happy that we did not see this complex of buildings torn down which it easily could have been.

Just to also mention, because we felt that the project as proposed was less than significant we did not agree with placing the three mitigation measures which are on page 11 in your report for the HAB survey, the display and the additional review by the building department so that concludes my comments. Thank you.

Chair Martinez: Thank you Scott. Anyone else? I wanted to hear from our City Attorney, Don.

Mr. Donald Larkin, Senior Asst. City Attorney: Thank you. Chair Martinez had asked me to talk a little bit about what the Commission's role and purview is tonight and the primary purpose of the hearing tonight is to hear from members of the public and give them an opportunity to comment on the DEIR but its also an opportunity for members of the Commission to comment and to ask questions. Unlike a lot of the items the quasi-judicial items that come before the Commission, your purview tonight is not limited to just making findings but you are able to comment on any aspect of the DEIR, not just those aspects of the DEIR that relate to the Commission's normal purview however tonight is not the time to give direction to the applicant or to receive substantive responses to questions. That will happen when the item comes back for formal recommendations by the Commission and substantive responses to the comments will be handled as part of the final EIR.

Ms. French: I'm just going to add that the applicant John Tze is here in the audience but he is not planning to present the project but he is here for questions.

Chair Martinez: Okay, with that I am going to go to the Commission, if you have questions before we go to the public. Commissioner Tuma.

Commissioner Tuma: I had a few questions for our City Attorney and just a little bit about procedure here. Are we taking an action tonight or simply making comment?

Mr. Larkin: It's primarily making comment. You aren't taking action except to forward the DEIR on and continue. The comment period will remain open until November 14th so no formal action is being taken tonight.

Commissioner Tuma: The second question has to do with the process leading up to potentially a statement of overriding consideration. If I heard right, I just heard two different opinions about whether a statement of overriding consideration is necessary here. The first that it is necessary because of the site and the second that it is not necessary because the mitigations are adequate to reduce the impact below a significant threshold. Is that sort of fair about where we are on that issue?

Mr. Larkin: That issue would come back as part of the final EIR so that's a fair assessment of where we are.

Commissioner Tuma: In terms of a statement of overriding consideration, are there criteria? Is there a specific standard? How do we go about analyzing? I assume it is somewhat of a balancing of the impact that would not be mitigated versus valuing the project moving forward, but are there specific legal criteria or specific criteria that we are going to use to make that decision or recommendation as far as whether an overriding consideration should be applied in this situation?

Mr. Larkin: I think, and I may oversimplify this because we'll come back with more detail when it comes back, but essentially it's a balancing test and there are criteria that would be analyzed and there are circumstances in which its not possible to make a statement of overriding consideration so we would come back with that formal analysis if and when that time comes.

And actually there might be an opportunity, Rick Jarvis who was our outside CEQA legal consultant is in the audience and maybe he can, if you want more specifics on that, he can probably answer that.

Commissioner Tuma: To me it might be helpful because we get a sense for where we might be going with respect to if we get to the issue of having to decide such a statement is necessary to understand what the criteria would be, I'd love to hear it from the consultant but is there anything about this in the Staff Report? The criteria or analysis we would go through?

Ms. Lee: For the purposes of overriding considerations no there isn't. That would come back to you November 30th.

Mr. Larkin: It's a little bit premature which is why it's not in the Staff Report but I think if it's helpful it's a good thing for Rick to explain.

Commissioner Tuma: To me it would be helpful to know and for the public to understand, if we go there what are we looking at factually in order to get to this balancing test so I realize we aren't going to make that decision tonight but knowing where to probe and what to listen for and what questions to ask would be helpful.

Mr. Rick Jarvis: My name is Rick Jarvis, I'm the outside CEQA Attorney for the city. I can speak to the issue of the statement of overriding considerations. The threshold, CEQA requires analysis of what are the environmental impacts, what are the ways to mitigate those impacts and are there going to be any impacts that are going to remain significant and cannot be mitigated to a level below significance. The draft EIR identifies one such impact for this project and that's the cultural resources historic impact and that's a little bit of a weird situation because that determination was based on conflicting opinions. There was one opinion by an expert who said this was significant and unavoidable and another expert said it was possible to mitigate it.

The draft EIR for purposes of public disclosure and public review took the more conservative approach while at the same time still flagging that as an issue for the decision maker ultimately to decide whether this impact will be significant and avoidable or not. The Historic Resources Board just looked at it and they've concluded that they don't think it's significant and unavoidable. So if the decision maker, ultimately the City Council at the end of the day, accepts HRB's position on that, then you will not even get to the point of having a statement of overriding considerations because there are no unmitigated impacts for this project.

If, on the other hand, there is a significant and unavoidable impact such as the historic resource impact is found to be unavoidable, then what CEQA provides is the agency can still approve the project even if there's a significant environmental impact but it has to explain what are the overriding considerations which justify approving the project notwithstanding that impact. There really isn't that much of a standard for making that determination. It is really a policy

determination for the City Council to make in weighing the apples and oranges. On one hand you've got this significant environmental impact. On the other hand you've got the benefit to the community of redeveloping this site so it really is an apples and oranges comparison where you can't compare the two and the point of CEQA is not to prohibit the city or whatever agency from making that decision but to force them to disclose that. To force the city to go on record saying, yes there is a significant impact and we acknowledge that but we think it's more important to have those benefits and you identify what those benefits are.

Commissioner Tuma: Let me just ask one follow up question to that procedurally and that's that would it be appropriate potentially for recommending body or deciding property to come to the conclusion that there is not an impact that can't be mitigated however, if it was felt that there was an impact that couldn't be mitigated, nonetheless we would come with a statement of overriding consideration, in other words a belt and suspender type of approach essentially protecting the city from some sort of attack there where you say it doesn't rise to that level but even if it does we think its appropriate to take these things into consideration but approve the project.

Mr. Jarvis: The short answer to that question is yes. I could debate the points of it. I mean if an agency at the one point is saying we don't find it significant how much weight you give to the agency's finding that's saying we think that something else is more important and overriding and there is no requirement that the agency do that next step of the analysis but there is nothing prohibiting the city from doing that.

Chair Martinez: Okay, Commissioner Lippert. Before you speak I would like to kind of hold our comments and try to get to the public before it gets too late. Commissioner Lippert.

Commissioner Lippert: Mr. Jarvis, I have some questions along the same lines. There are subtle aspects of this report that I'm trying to get a handle on. Under the impact CR2 and CR3 it says the Edgewood Plaza is considered historically significant under federal, state and city criteria and then I go through the report and maybe I'm understanding this wrong but it doesn't appear on the National Register of Historic Places. It's not on the state inventory and it's not designated under the city inventory so I'm trying to understand how it could be considered historically significant and yet it doesn't appear on any of these resource lists. **1.1**

Mr. Jarvis: It's not uncommon. There could be any number of reasons why a particular structure might be deemed historically significant even though it hasn't been officially designated as such and CEQA requires, obviously if its been designated then it automatically gets deemed significant but CEQA requires a next step of analysis to be done which is even if its not designated, some analysis of whether it meets the criteria for being designated, there could be any number of reasons why the steps weren't taken to actually designate it but CEQA requires that you look at and evaluate the criteria for whether something is in fact significant and it is a factual determination at the end of the day for the city to make. You have two experts who do both agree that this shopping mall is a historic resource. From a lay perspective I can see debating that but at the end of the day it would be for the city to make that determination as to whether it's significant or not.

Commissioner Lippert: As a follow up to that, under the CC&Rs for the site itself it states that it has to remain a shopping center but there is nothing in the CC&Rs that the buildings have to remain, it just has to remain as a shopping center. Is that correct?

Mr. Jarvis: I can't speak to that. I might have to turn to staff for that.

Mr. Curtis Williams, Planning Director: They are actually private CC&Rs that we don't enforce but that's my understanding is that the CC&Rs require it to remain a shopping center.

Commissioner Lippert: The reason I asked that question is that the relevancy is that the neighbors have reached a negotiation or an agreement that those CC&Rs would remain in place and from our point of view as a city reviewing this, we wouldn't look at this and rezone it as say, housing.

Mr. Williams: The CC&Rs themselves are a private matter to the parties that are subject to them. The city is not a party to the CC&Rs so in terms of what the city's action is, the CC&Rs don't matter but from the applicant's perspective, complying with the CC&Rs would likely save them some objections and possibly a challenge.

Commissioner Lippert: One other question for you Mr. Jarvis. With regard to again the EIR, if the applicant were to come forward and say, hey we want to bulldoze the site and build a new shopping center there based on what is permitted in the underlying zoning as well as the CC&Rs, could they do that and would it require the same environmental analysis?

Mr. Jarvis: The applicant can propose whatever it wants to propose and the city can consider whatever it wants to consider but that's not what this EIR analyzes so if the applicant were to come forward with a different proposal like that I would think there would need to be another environmental analysis prepared to make sure it complied with CEQA. I'm not sure if that answers the question.

Commissioner Lippert: Well, I'm interested again, going back to the historic, I'm trying to understand the complexity of the use which is embodied in the CC&Rs and zoning and the historic entitlement or the historic structures that are there and I'm just trying to understand how this all fits together. If somebody said well, there is no benefit in those buildings but there is a benefit in having a retail shopping center.

Mr. Jarvis: I'm still not sure if I understand the question to the extent that there is anything I haven't already answered.

Commissioner Lippert: Okay, thank you.

Chair Martinez: Commissioner Tanaka, quickly.

Commissioner Tanaka: It's quick. Two quick questions. So in terms of considering, I guess we might need overriding consideration, I'm a little bit confused on that topic, but is this also a place to consider or discuss school impacts and deficiency of public benefit?

Mr. Larkin: No. And it's actually not the time to consider the overriding considerations. They are a good background information to have but at this time we're not requesting or asking for a statement of overriding consideration.

Commissioner Tanaka: I also wanted to know in terms of talking about public benefits or school impacts.

Mr. Larkin: Public benefits is part of the discussion on the PC ordinance and then school impacts is not a subject that can be analyzed, just determining whether or not to approve the development project.

Chair Martinez: Okay, we are going to go to public comment. We have several cards from the public and we will give you each three minutes to speak. Commissioner.

Vice-Chair Garber: We have currently five speakers. The first is Jeff Levinsky to be followed by Beth Bunnenberg. You'll have three minutes.

Mr. Jeff Levinsky: Good evening Commissioners and staff. I live a few blocks from Edgewood and shopped there a lot when Albertsons was still there. I've been following the ups and downs for years. I hope we can make progress at the center and very much appreciate the draft EIR and additional information the staff has circulated. I submitted eleven questions and comments to the EIR process. The online version of the staff report omitted most of them however they are in the printed version. I hope you all received the full version of my questions. **2.1**

My basic concern is the parking needs of the office building. The office is a historic building as well. To provide it with just 16 parking spaces when it appears to require 55 creates numerous concerns including parking gridlock throughout the shopping center and surrounding neighborhood. The office building currently houses the Maharishi Enlightenment Center and they may need no more than 16 parking spaces but they have already tried once to sell the building. We learned that once Hewlett Packard occupied these offices and any similar company when faced with a 14,000 square foot building are going to want more than 16 parking spaces. I believe the easement is a private agreement between the two different parcels and the city's interests are different. The city's interest is making sure there is enough parking for everybody in the neighborhood. **2.2**

In fact, I think that there has been an unfortunate outcome that the historic preservation of the office building has not been considered. If it does not have adequate parking, it will have financial viability problems and it's effectively become the sacrificial victim for the retail and housing projects and it suffers in silence for I find no mention of this in either the draft EIR or any staff report. **2.3** Ownership could also change at the retail sites. In March, the San Jose Business Journal reported that a default notice had been filed by Comerica Bank against Ho Holdings listed as the actual owner of the retail site. The article points out that such a notice precedes a foreclosure sale. While perhaps the bank and investors have worked something out, the finances appear precarious. We might wake up one morning to find a brand new owner so just please make sure everything is enforceable rules that survive market volatility, tenant turnover and of course new owners. **2.4**

Finally, Eichler tried to create a harmonious community of homes, shopping and offices. It was in his interest to ensure every site had what it needed. I can't imagine that he would have built an office building with inadequate parking but with separate owners the interest of one might conflict with another so please ensure the EIR looks at the impacts of each building's viability and of Eichler's original community vision. Thank you. **2.5**

Chair Martinez: Can I get staff to respond to the adequacy of the parking please?

Ms. Lee: Thank you Chair. Basically, the office building located at 1101 Embarcadero is a separate building but there is an easement recorded on both properties providing for vehicular access and 16 nonexclusive parking spaces so the applicant is continuing to maintain then I guess historically the occupants of that office building has parked on the parking center site so the applicant is continuing to provide that same situation and in fact through this project we'll probably improve the parking lot situation.

In terms of the CEQA impacts, we are looking at this subject site and the applicant is proposing to comply with the city's requirements and ordinance and we can certainly look at the parking more in terms of the actual PC formal review but in terms of the CEQA EIR we believe that it is adequately addressed. Again, his comment letter has been included and will be included in the final EIR along with specific comments and responses.

Chair Martinez: Okay, thank you. I'm sorry for interrupting.

Vice-Chair Garber: The next speaker is Beth Bunnenberg to be followed by Robert Moss.

Ms. Beth Bunnenberg: Good evening. I'm Beth Bunnenberg, 2351 Ramona Street on Palo Alto. Tonight I'm speaking as an individual, not as a representative of the HRB. Edgewood Plaza is a wonderful candidate for rehabilitation. Just to speak to Lippert's question, the Dames and Moore survey was conducted before Edgewood became 50 years old so that's why it was not included in that major survey that we did. In fact, it hadn't been too long ago that Edgewood became 50 years old so Commissioner Lippert that's the part of the answer to what you were asking.

I come to you really representing a minority of one and with all due respects to my colleagues I would like to present a different opinion because of the Secretary of Interior standards and you will notice in the draft EIR, references are made all along to the Secretary of Interior standards and integrity and all this kind of thing. I disagree with the less than significant impact. At this point, the city is putting in this draft EIR that significant environmental impacts of relocation of building 1, the marquee sign and construction of ten new family homes. It's the job of the HRB to determine whether a project meets the standards of the Secretary of Interior and Edgewood obviously has become 50 years old and people look at it as its tired, it's dingy, and it's hard to see the basic bones of the building.

3.1

As you've heard the applicant Page and Turnbull and the city's peer reviewer took opposite positions in this area of the siding and whether that was a really significant feature to this project and obviously the HRB had difference around that matter. The Carey report sees the Eichler design and the relationship to adjoining Eichler housing such as now Green Gables is a national register district and the Edgewood tract of Eichler homes. The Page and Turnbull as you've heard just looks at the three individual buildings in their evaluation.

Edgewood Plaza is Eichler's only shopping center. The vision was a walkable bike safety way for the neighborhood to get to their needed shopping and this was a kind of ground breaking thing at that time. The Secretary of Interiors standards says that in the rehabilitation the property should be used for historic purpose or placed in a new use that requires minimal changes to the

building site and environment and that the removal of historic materials or alterations of features or spaces that characterize a property should be avoided. In fact their not recommending section says removal or relocation of historic buildings or landscape features that destroys the historic relationship between buildings, landscape features and open space should not happen so that that is the guidepost that the HRB is working on and I agree with the Carey report that moving the building and the housing would not conform to the Secretary of Interior standards. Thank you. **3.1**

Vice-Chair Garber: Thank you. Robert Moss to be followed by Adena Rosmarin.

Mr. Robert Moss: Thank you Chair Martinez and the Commissioners. I have a different concern about the project and that's the residential portion. The staff report gives the floor area of the homes as 18,105 square feet but doesn't give the area of the lots but it does give the minimum and maximum size of the buildings and the smallest home as 2153 and the smallest lot is 3396 then it's the equivalent of a 0.63 FAR. The largest building is 2696 and the largest lot assuming that they are matches is 4148, that's and FAR of 0.65. The normal FAR for single family homes is 0.43 for this is significantly more than we normally would get. **4.1**

Second, the commercial portion of the site is a little over 37,000 square feet and now we've got 18,000 square feet of homes added so along from having a historically important commercial center to a property which is one third housing and two thirds commercial which significantly skews what you've got on the site so I would suggest that you adopt alternative three which is mentioned in the report which is to reduce the number in the total area of residential units by two or three units instead of having ten units have seven or eight. That will make the FAR smaller. It will make the continuity between the residential and commercial less jarring and it will be more consistent with the existing homes in the neighborhood which are not this large next to small lots so you'd have a better project all around. **4.2**

One of the other things to keep in mind is that if you reduce it you're also going to be reducing traffic and potential parking overflows. Since this is over five units and over five units or more are required to have a BMR unit but staff report doesn't specifically say there is going to be one but there has to be one. Which one of these homes is going to be the BMR? I don't think it should be the smallest one and obviously they are not going to make it the largest one but you should identify which home is the BMR and it should try to be consistent with the overall project, one of the medium sized homes. It's a bad idea to have the BMR units always be the smallest and the least attractive on a site so that should be explicit if this comes back. Thank you. **4.3**

Vice-Chair Garber: Thank you Adena Rosmarin to be followed by Jon Foster.

Ms. Adena Rosmarin: Good evening. My daughter Heather Rosmarin's home is a few hundred feet north of the project and she has submitted a letter by email and I have hard copies here which I can give the Secretary for the record. I have a procedural comment and then several comments on the adequacy of the EIR more directly. **5.1**

First, we request that there be clarification and recirculation of the notice and comment deadline. Currently, as has been stated, comments may be submitted by November 14th but in a following paragraph it stated that all issues must be raised by the time of this hearing or they cannot be considered in court. Clearly, there should be one deadline to constitute adequate notice for the

full 45 day public review and comment period. To be effective the public should be allowed to submit comments and raise issues until November 14th so there should be a re-notice to that effect. **5.1**

On the DEIR's adequacy, more directly, we believe the description of surrounding land uses is inadequate. There are approximately 90 condominium homes a few hundred feet north of the project which do not even receive a mention and which will be clearly impacted during both the operation of the project and its construction and we believe the DEIR should be revised to study that impact. **5.2**

More broadly, the analysis of traffic impacts is flawed and incomplete. Both the DEIR and the traffic transportation analysis failed to study the impacts of increased vehicle traffic on West Bayshore Road both during construction and operation and that flaw should be corrected. The TIA fails to note that there is a major Cal Trans project that will run concurrently with the construction of this project and CEQA requires that there be an analysis of concurrent projects. **5.3**

The plans provided for public review were unclear as to whether truck traffic will come from the north on West Bayshore Road and if it does there will clearly be impacts to the residents along that road and the DEIR should be revised to study those impacts. **5.4** The analysis of bicycle and pedestrian access to the project site is both flawed and incomplete. There are bald statements that the access in both ways is adequate and that is incorrect. **5.5** There is currently no safe pedestrian or bicycle access… Is that my time? …From West Bayshore Road therefore the project will increase use and traffic hazards and these should be studied in the EIR. Thank you.

Vice-Chair Garber: Thank you. Before you leave one of the Commissioners has a question for you. Commissioner Lippert.

Commissioner Lippert: I had a question for staff and the City Attorney which is could you clarify the deadlines and how they work as well as could you talk about our process in terms of certification of the EIR and how the item would be returning?

Ms. Lee: The public comment or circulation period is 45 days from September 30th and so it ends close of business on November 14th so we request comments by that time to include in the final EIR. In terms of the second question, basically what's going to happen is that at the close of the comment period the consultant and staff will prepare responses to comments that will be put in the format of the final EIR with the draft. All of that is considered the final EIR. That will come back to the Commission along with the project for formal recommendation whether the formal EIR should be certified as well as the project should be approved or not.

Chair Lippert: So when it is referring to the hearing date it is referring to the whole period in which we take our action. Is that correct?

Ms. French: The next hearing date before the Planning and Transportation Commission would have the whole of the action as far as the project plan review, the ordinance and the responses to the comments hopefully by that time prior to getting it to the City Council for their action.

Chair Lippert: Okay, beg my ignorance but it doesn't subrogate any of the public's rights in terms of filing a lawsuit or raising comments.

Ms. French: That is correct. We're simply wanting to get the comments before the end of the public comment period to make sure we can respond to those comments in the final EIR. People can still comment on the document afterwards but there is no answering those in the final EIR document.

Ms. Rosmarin: I'm sorry, the reason we flagged this issue is that the last paragraph on the comment section states very clearly that to be considered in court the issue must be raised by this hearing, October 26th.

Ms. French: I would just say in general we always put on our notice cards because its in the best interest of somebody who could bring a lawsuit if they attend hearings at every opportunity so we put that as a qualifier on our cards but you can submit your comments at any time to get them answered in a formal document, you submit them by November 14th.

Ms. Rosmarin: That's not what it says.

Mr. Williams: We will take a look at the card and if it looks like there is confusion we'll send out notice and let people know that they do have until November 14th. I appreciate what the speaker is saying, that it sounds like there is some confusing language there and we don't want to let anybody misunderstand that they must speak tonight at this hearing in order to have legal standing in terms of this issue so we'll look at that and if its necessary we'll set up notice and clarify that they do have until November 14th to provide written comments as well.

Vice-Chair Garber: The next speaker is Jon Foster to be followed by our final speaker Herb Borock. Mr. Foster.

Mr. Jon Foster: Thank you and good evening everyone. My name is Jon Foster. I live on Channing Avenue. I live several blocks away from the project site. I am going to limit my comments only to the issue of the historic preservation aspect of moving one of the buildings on the site. I think if you talk to residents in the neighborhood which I've done quite a bit of, there could be debate on the issue of the historic nature of the building and I think many people would feel comfortable if those buildings weren't there at all but if you limit it to the issue of simply moving those buildings, there would be very few residents concerned about it. **6.1**

I'm not an expert on the historic preservation laws, I'm simply a resident of the Duveneck St. Francis neighborhood but the reality is that shopping center has been empty now for however many years. It's a blight on the neighborhood and it would be great to see it redeveloped and be back to the purpose it was intended for along with a few housing which I personally feel very comfortable with so the key to me from a realistic, layman's point of view is the idea of moving one building some distance to accommodate the new design, I'm sure the developer would just assume not move a building but the new design as I see it really does require that. So from my perspective, as one balances the historic preservation which the developer is doing by keeping the structures as they are, simply moving one is a no-brainer. I would absolute support moving the structure and I think the developer has gone out of their way to preserve the structures and the structural integrity so I think moving one structure to allow for redevelopment of a shopping center that has been abandoned and blighted for years is an easy decision to make and I would support it. Thanks for your time and consideration. **6.2**

Vice-Chair Garber: Our final speaker, Herb Borock.

Mr. Herb Borock: Thank you Chair Martinez and good evening Commissioners. Earlier when Mr. Levinsky was making some comments it sounded to me as if the Chair was asking staff to respond to his comments at this time. My understanding is that the purpose of this meeting and until November 14th was to receive comments on the draft EIR and the appropriate time to get responses is when whoever is preparing them after the comment period closes, that it's not the place here for Commissioners to be asking staff to respond to comments that are being made. I realize that you may have questions to ask the staff to clarify some issue that enable you to make comments. Those would be the appropriate type questions to ask, not to ask staff to respond to comments that either the public or the Commissioners make at this time. Thank you. **7.1**

One more thing, on the card, it was described by the speaker on the deadline. It seems to me that as Mr. Williams indicated, that a correction is in order not just giving the new date but explaining that it's a correction to the previous one. Sometimes these things happen. I think the reason is in the past, I believe before Gary Baum became City Attorney is that the normal process was to wait until the comment period ended before public hearings were held before boards and commissions. That the public hearings were not held in the middle of the comment period. Thank you. **7.2**

Chair Martinez: Okay, thank you for that. Commissioners, I would like to see if we could kind of address the issue of historic cultural resources sort of as a body but there are other issues related to this DEIR and I wanted to see if you had questions or comments related on the other impacts before we delve into this. Commissioner Garber.

Vice-Chair Garber: Staff, could you help me with just two things? One, could you briefly summarize the impacts that the EIR summarizes relative to traffic on the residential side of the project? That was one and then the other was how the EIR addresses the issues of the homes both in terms of the increase in bulk and mass on that side which includes the topic of FAR floor area ratio and if there were other issues that the EIR really focuses on so the summary of both of those would help me a little bit. **8.1** **8.2**

Ms. Lee: Thank you. The Environmental Impact Report did include a TIA, Traffic Impact Analysis and the analysis identified only one significant impact and that was that the project would cause a significant impact at Wildwood Lane north of California Avenue and Embarcadero signal lights intersection. The EIR also identified a mitigation measure transportation 1.1 where that, basically it states that because of a signal spacing consideration, traffic signal is not recommended however what the project should be required to do would be to restripe Embarcadero Road to create a left turn receiving lane. As part of the project left turn lane improvements at Embarcadero St. Francis drive a left turn receiving lane would be built at Wildwood Lane. This would facilitate outbound left turns and reduce left turn delay which would reduce the project impact to a less than significant impact. That is regarding transportation.

Vice-Chair Garber: Actually, if I may interrupt before you get to the other portion. So were pedestrian bicycle use or potential mitigations considered from access from the residential side onto and off of the subject property? **8.3**

Ms. French: The Environmental Impact Report did look at pedestrian and bicycle safety and the consultant, Judy, may be better able to answer these questions. Rafael Ruis, our Transportation Engineer is also here in the audience.

Vice-Chair Garber: If we can take a moment, sure.

Ms. French: This is Nora Monette, also with David J. Powers.

Ms. Nora Monette: Hello. My name is Nora Monette. I'm Principal Project Manager at David J. Powers and Associates and again we're assisting the city in the preparation of the EIR. In the initial study portion of the EIR transportation is discussed in that section and there are tables that show the trip generation from both the housing and the commercial and also evaluate the access points to the project and the residential access is primarily off of Channing and then the access points to the commercial are kind of in their existing locations. There isn't really the only access off of West Bayshore is for trucks and so that's not a primary pedestrian or bike access.

Vice-Chair Garber: So let me just ask sort of a general question recognizing that EIRs are trying to focus in on quantitative data such that the differences can be measured but we are looking at a property that has not had tenancy for some number of years. The environment in that particular corner of Palo Alto has changed in that the use of Embarcadero and 101, etc. presumably has changed over some period of time and the use of that property, there's not a lot of traffic going in and out of it now. I'm thinking less quantitatively in terms of the traffic that is generated in terms of trips, etc. but in terms of impacts of children utilizing the shopping center or utilizing the park area, etc., there may not be, if you will, significant pedestrian trips but are there issues that the EIR considered that have to do with public safety, changes in the rate, the miles per hour that cars are allowed on the street or additional stop signs, markings on streets, things of that sort that would increase or address some of those issues.

8.4

Ms. Monette: Probably the best thing at this point is to get some of these questions into the record and we can respond to them in the final EIR. There are discussions of bicycle and pedestrians and so…

Vice-Chair Garber: That's fine. Part of the reason I wanted the summary was to find out sort of where it was focusing to see if those issues had and if they hadn't been to get them into the record.

Ms. Monette: Right. There is a discussion if there are particular issues like access for school children speeds if we can get that into the record and make sure they're responded to by the traffic engineer and city traffic specialist to make sure that answers that question so if you want to pose specific ones that would be great.

Vice-Chair Garber: Great. And in regards to the housing?

Ms. French: So the housing and the impact of the housing was looked at both from a historic resources perspective in terms of how it affects the site and it was also looked at for the aesthetics perspective where the requirement would be that it would be reviewed by the ARB and required to be consistent with the city's ARB findings.

Chair Martinez: Anyone else? Yes, Commissioner Tuma.

Commissioner Tuma: First I wanted to thank staff for the format of tonight's report. Oftentimes we get these big huge documents and to analyze an EIR we have to actually go through page by page and look at the chart and see where it is and see what the meat of the issue is and tonight's report sort of brings that out and that not only makes our job a lot easier but it also I think allows the public to digest what the key issues are and so I would encourage all the time to sort of have this format where we bring the issues out of the EIR and into the document itself because oftentimes even for the public to get a hold of one of these or download it or sift through it is difficult so good job on bringing that out and making it easier to use. **9.1**

The one topic I wanted to talk about other than the historic has to do with the office building. I know the office building isn't part of this project but when you look at Section 3.1.1.1 deals with surrounding land use and that paragraph simply mentions the fact that that building is there. But it's difficult for me to believe that perhaps while the existing tenant is there the impact of only having 16 parking spaces, maybe there isn't an impact, but if that were to change tenants or evolve forward to a different use, what have you, you may wind up with an obsolete building. You may end up with a situation where they say they're only going to have a certain number of cars but cars park into the neighborhood and you have spill over and impact. **9.2**

It seems while this isn't part of the project, it is part of the surrounding land use and I just want to make sure that that gets addressed in the EIR itself because I think the impact there may be from spill over parking as a result of the project even though that particular building is not technically part of the project. Thank you.

Chair Martinez: Commissioner Lippert, do you have comments other than cultural resources?

Commissioner Lippert: They are related to cultural resources but they have to do really with the different scenarios.

Chair Martinez: Well, why don't you try?

Commissioner Lippert: Reading through the different alternative scenarios here and the first one of course is a no project current conditions scenario but the next one down is a no project remodeling scenario and the reason I cite this is that it is my understanding that what is triggering this project in terms of public benefit is the historic rehabilitation of the buildings as well as the additional housing if I'm correct, in the PC. Director.

Mr. Williams: And assuring there is a shopping center. **10.1**

Commissioner Lippert: Yes, three of them. So what I'm looking at here is under the no project remodeling scenario here it specifically states that future work on buildings 1 and 2 would be completed following Secretary of Interior's standards for rehabilitation of historic properties however, if there really is no change in adding the housing element, they are keeping a shopping center and they are renovating a shopping center, the Secretary of Interior really doesn't come into play as a necessity therefore, why is it being considered as one of those scenarios or alternatives in a no project remodeling scenario.

Mr. Williams: Just to clarify, is your comment that it's not an alternative that should be considered or is it just an observation?

Commissioner Lippert: It's an observation that the Secretary of Interior's standards are not necessary for remodeling that shopping center if we are not looking at the historic rehabilitation as being a public benefit. In fact, today the shopping center could be remodeled and rehabilitated and the buildings could be left where they are without any review by this body. It would have to go before the Architectural Review Board for any exterior improvements such as signage or color but in fact, there is no planning involved in a no project remodeling scenario and it's questionable whether it would even have to go before the Historic Resources Board. **10.1**

Ms. Lee: If the applicant was proposing to remodel the center and not add in the housing and if the change were significant enough to trigger architectural review, it would trigger CEQA. If we had evidence that the site may be historic, we would require historic analysis and that would be part of the Architectural Review Board hearing and if we determine that it is a historic resource which we would have, we probably would request HRB recommendation on whether the project observes or adequately addresses the historic impacts.

Commissioner Lippert: So is it fair to say that it would require that it be remodeled under the Secretary of Interior standards even if they weren't proposing doing anything other than tenant improvements?

Ms. Monette: It depends on the extent of the change. If the change rises to the level of being an architectural review permit, whether its by staff or by board, that is a discretionary permit that requires CEQA and if CEQA is required we would definitely be looking at impacts to historic and that could trigger a requirement of conformance with the Secretary of Interior standards.

Chair Martinez: Commissioner Lippert, to follow what the EIR consultant said just a few minutes ago, I think if you could put your questions as a comment for clarification, I think that might be beneficial rather than questions to staff so that if you're looking for more clarification on alternative scenario number 2 because you don't understand it it might be important to ask that to be addressed in the final draft.

Mr. Larkin: Just to clarify a little bit on what that's about, we're required as part of the CEQA review to look at a range of other alternatives to the proposed project to determine if there are environmentally superior projects that would also meet the goals of the applicant and project description and that's what this is really about. It's not about this proposed project but its one of the alternative scenarios that was examined to determine there was a superior alternative that would also meet the goals of the applicants so it's not really whether it would require a different review, its part of the alternatives analysis.

Commissioner Lippert: What I'm trying to understand is I think that, as Mr. Jarvis pointed out, just because a building is old doesn't necessarily make it historic and I'm trying to understand what the threshold is that begins to trigger the historic review and having to renovate a building or rehabilitate a building under the Secretary of Interior standards. If we had had this project move forward and there was no housing element associated with it, if there was no moving of the building, if there was no park associated with it, would it trigger the necessity to follow the **10.1**

Secretary of Interior standards. The reason I'm asking this line of questioning with regard to the scenarios is that it helps me in making the findings for a statement of overriding consideration as to, is what we currently have better than what is being proposed here? **10.1**

I don't discount any of the scenarios here. I am just trying to understand how specific the scenarios have to be and whether in fact it is correct that it would need to be remodeled according to the Secretary of Interior's standards.

Chair Martinez: Commissioner Tanaka.

Commissioner Tanaka: Thank you. So I had when I was looking at the report I had some questions and concerns about the FAR and about the way it was calculated. It was not as clear as I was hoping and so one question for staff is I know that Palo Alto has some private streets concept where we are not supposed to… Well can staff clarify what is a private street and what is considered a private street? **11.1** **11.2**

Ms. French: When there are more than four housing units being served by a driveway, there are different standards involved and I believe in this configuration, Elena can clarify where this is found. Our set of plans that are going to the Architectural Review Board next week are more detailed.

Mr. Williams: If I could just add, there are private street standards for width and also provisions that go to the zoning code as to how to calculate FAR. Those from the zoning standpoint are not applicable because this is a planned community. So the planned community is defining on this site what is the FAR for this site so it's entirely discretionary to the Commission ultimately as to whether or not this is adequate both in terms of the street layout as well as the size of the homes and number of homes, etc.

Commissioner Tanaka: With the final report, will be get an exact calculation of the FAR for each house and how this is compatible to the neighborhood? **11.1**

Mr. Williams: Yes.

Chair Martinez: Are you done? Okay, I wanted to do one follow up on the alternative scenarios and that's the no project scenario because the implication is that there is no impact. Is that sort of the standard for what an EIR should state? For example, it's clearly that there will be impacts of no project. The neighborhood will suffer with continued blight. We will not have the advantage of another grocery store. The storm water will continue to sort of not be managed to current standards and so on so my question is, is it pro forma to say that no project means no impact or should that be addressed in an EIR? **12.1**

Ms. Lee: I think staff would like to defer to Judy or Nora to discuss requirements for alternatives. Rick.

Chair Martinez: Thanks Rick.

Mr. Jarvis: I'll address that. Yes, it's basically a pro forma to treat for CEQA purposes the impacts of the no project alternative as being no impact and the reason for that is the CEQA

analysis requires an analysis of what is the change in existing conditions that will result from this activity? If the project is approved and the EIR analyzes all the different changes that will happen from approval of the project. If the project is not approved and nothing happens then the existing environment will continue to persist in this existing state and so for CEQA purposes that's considered to be no impact, that CEQA conclusion certainly does not constrain or prohibit the city from making the observations that you just made that the practical real world consequences of no project will be a continued state of these negative things happening.

Chair Martinez: Don't go away Rick. I heard the statement saying that the purpose or limit of the EIR is to acknowledge the impacts to the environment. What is the purpose of quoting and considering the Comprehensive Plan in the EIR?

Mr. Jarvis: One of the area of "environmental impact" that the EIR has to look at is impact of the project on the city's land use planning and that requires an analysis of how the project relates to the city's existing Comprehensive Plan, zoning ordinances, and the purpose of that analysis is to ferret out any impacts that may result from approving a project that might have some inconsistency with the city's planning and what that would mean for the city.

Mr. Duncan: I can just build on what Rick said. It's not every aspect of the general plan but those aspects of the plan that deal with mitigating impacts on the environment and health and safety.

Chair Martinez: Okay, I lost my train of thought on this one but then should there not be a finding in the DEIR regarding the Comprehensive Plan? I didn't see it and I'm not saying I read everything in it, but… **13.1**

Mr. Larkin: It's on the initial checklist so if you go through the initial checklist there is a place where they have to indicate whether it is consistent with those provisions in the general plan. I don't have the bound volume so I can't point it out.

Ms. Lee: Page 26 of the EIR has discussion on the Comprehensive Plan.

Chair Martinez: I got that far but it only discusses if I recall the neighborhood center's discussion of it but it doesn't talk about transportation which some of these things I found later and one of my comments recommendation is I would like to see the discussion of Comprehensive Plan be in one place and not all over because I'd like to look… It is sort of a cross referencing document and I'd like to be able to see a discussion of all of the relevant elements in one place and I'd like to see a discussion or a conclusion of how it impacts the land planning in the city. **13.2**

Okay, thank you for that staff. Commissioners, are we ready now to take on the big one? I'm going to start with Commissioner Garber.

Vice-Chair Garber: I think I had actually addressed this issue fairly directly in our April 27th meeting but I will if the Commissioners will allow me, reiterate my conversation at that time. I'm going to back into the issue here.

The way that I think about this project is that the Edgewood Plaza when it was initially built in the 50s was really built for a significantly different set of circumstances that our community and this project is trying to address today. The city was a fraction of its population. The roadways were used at a fraction of the intensity that they are today. The nexus that I think the developer was trying to take advantage of in 1950 had very little to do, I suspect, with the neighborhood than it did with the recent completion of Highway 101 and its connection of San Jose and San Francisco so in that way it shares a history with a lot of shopping centers across the nation as the highway systems were being connected and completed throughout the country and shopping centers all over the country were being developed. That nexus has changed dramatically as has our community which is now significantly larger, significantly more dense, and all of our roadways are significantly used at a much higher rate and intensity.

You can see those difference in the vision of the design. The design as it was done in the 50s is what might be referred to as an island or poached egg scheme and you had all the buildings in the center with a lot of parking surrounding it. That vision is significantly different and that vision of our community is significantly different than it is today. The change now and the nexus that I suspect the applicant and developer is looking forward to capitalizing on has to do with this as a community resource and recognizing that it is not a community resource but a neighborhood resource and has an impact directly on the neighborhood and the design has changed dramatically. It is no longer an island as was discussed back in April by moving the building slightly over to the side essentially the building has become the dividing line between what is the commercial side of the property and residential side of the property and the impacts and scale relative to those two sides is much different. **14.1**

It is therefore not surprising to me at all that there is a lot of discussion and debate as to the impact of the slight move. I am not surprised that it would be seen as a significant change to the historic resource however as I discussed back in April I think there is an aspect of utility of this site which is extremely important and if this project and the buildings and its planning does not address the current conditions of the city that are active in this particular part of the city it will become significantly less useful to the community and the neighborhood specifically so if in fact it is deemed to be greater than a significant impact relative to our historic resources I think it is very obvious that there are mitigating circumstances which would cause us to overlook that… I shouldn't say overlook that but cause us to support that moving in a way that has been proposed here. I think I'll leave it at that for the moment.

Chair Martinez: Commissioner Tuma.

Commissioner Tuma: What he said. I know we're supposed to say I align myself with the comments of Commissioner Garber, he said it much more eloquently than I can. I think the core issue here and bringing something that Commissioner Lippert was saying also which is you know, the reality is that this project has evolved from a much more intense, much bigger project redevelopment into something that the neighborhood seems it can live with, by and large the impact from a housing perspective is minimal and really what its about is turning a blighted, may by a bit tough of a word, but a place that isn't doing justice to Mr. Eichler and the original design as it is right now. People see it and they say oh, boy look how bad that has gotten. **15.1**

So I think its to continue, the phrase Commissioner Garber was looking for was a statement of overriding concern and I would completely agree that, or overriding consideration, that's the

proper one, either it doesn't rise to the level or if it does rise to the level, changing it to a use that makes sense, that works for the community, works for the CC&R holders, works for the developer, it just seems to me to be the right thing to do. We talk a lot about a bikeable, walkable city and what we want as our values as a city. The members of this community have a long way to go to get their groceries and do other sort of community oriented shopping. Some of them on the southern end of it can walk down to Trader Joe's in Town and Country but many people can't so if I think we're looking at what we want to be as a community and what our values are, what I see is a minimal impact on the historic resource here is acceptable. That's all I have. **15.1**

Chair Martinez: I appreciate that but do you want to put some of that into your comments that should be addressed in the final EIR? You don't have to but… Commissioner Tanaka.

Commissioner Tanaka: While I largely agree with my fellow Commissioners' comments I do think it's important that this project adapt with the times. I understand the historic value of this project and the meaning it has for Palo Alto and I think as times change things need to adapt so that it continues to serve the purpose. It is clear that the site needs to be rehabilitated and we want the site to be economically viable. What I mean by that is it's not just viable today or after part of the parcel is converted to housing to fund the redevelopment but in the long term as well. I know it's hard to actually forecast the future and figure out what's really going to be needed but that's one part for me that seems to be missing. **16.1**

Over the past 50 years things have changed. We've moved from this omelet or poached egg like concept to the half residential and half commercial but the thing that is still in the back of my mind and I said it last time and I'll say it again now is that this is in a very affluent area, its on a very busy freeway and why has this site not worked before? I still don't understand, well we're going to have unified parking and that should help somewhat. I'm concerned that we're getting a temporary shot in the arm for this site to make it viable for the community but I don't know if the longer term issues have been solved. What I'm concerned about is that in another 20 or 30 years we'll have to chop off another piece of this retail property to convert to housing to fund yet another redevelopment so I want to make sure that doesn't happen because I think this is a valuable resource for the neighborhoods and for Palo Alto.

Palo Alto needs the revenue for the city and that's one part for me I would love to see addressed better. I am also concerned about the issue Commissioner Tuma mentioned earlier which is the office and how that wasn't really contemplated in terms of, is this going to be enough parking in this redevelopment because we are losing a lot of parking on this site. Will this affect the viability of the surrounding commercial properties and I don't think we necessarily want that. We want to encourage that still and by this dramatic reduction in parking, we don't want this to spill into the neighborhoods. This would be a very adverse impact that this project would have so I think this is certainly a good attempt to make this a viable project and to make this to improve the situation but I don't know if everything has been thought through in terms of parking impacts in context to the surrounding commercial properties as well as the long term viability of this project. Can it continue to be a viable resource economically so businesses, and I'm not talking about the developer, but the businesses that reside in these properties. Can they sustain themselves longer term? Because we can have beautiful renovated buildings but it can be a commercial failure. We don't want that and the developer doesn't want that. We want this to be an occupied, vibrant used by the community center and I think we want to make sure that **16.2** **16.3**

actually happens so some sort of retail analysis or some sort of retail consultant that the developer is planning to do but that kind of work needs to be done carefully. Maybe improving the signage or doing something to make this project fly not just today but 10, 20, 30, 40 years from now. Thank you. **16.3**

Chair Martinez: Thank you. Commissioner Lippert.

Commissioner Lippert: First of all, I want to thank the applicant as well as members of the community and the authors of the EIR for your report this evening. In reviewing this document, where I find that I'm torn or have some difficulty is, and this is in reviewing the sufficiency of the document is under the scenarios. The reason I have difficulty with that particular portion of it is that I don't think that the range of scenarios go far enough. I think the most significant item that has been identified here is the historic element or historic significance of the shopping center. But what I have difficulty with, and I do a lot of historic preservation and rehabilitation work, I've done six projects in the last four years, is the undermining of the historic fabric of the shopping center and that a sufficient amount of the historic fabric has been removed from the shopping center or from the buildings and so there is something left of it and it has been identified as a potentially historic site but one of the main buildings in it has been totally undermined.

So it goes back to again the scenarios or alternative scenarios that are being proposed and I'm not looking at them in terms of whether they are desirable but I'm looking to understand what else would have been possible and preserve the last piece of historic fabric of that architecture. So in some ways, perhaps a scenario that and again, I'm saying this not that I'm proposing this, but demoing out the main building there and looking at reinforcing or having the buildings 1 and 2 preserved in their location where they are and perhaps having the housing integrated into the main building and going with more of a mixed use scenario there. The reason I suggest that is that the Secretary of Interior standards are very specific in terms of creating a distinction between what's original to the site and what's new to the site and so it creates a contrast or an understanding of what was there and what was being preserved. I think that that's in some ways what's sort of missing from these scenarios. An architect or developer could go in and build no housing and have shops move in there and have it be a shopping center as it almost is. It would continue perhaps to deteriorate, perhaps it wouldn't. **17.1**

It could be renovated under the Secretary of Interior's standards and have a housing element associated with it and those buildings remain where they are. I think that in order to look at the full range of possibilities there in some ways perhaps something needs to be done in terms of what isn't historic being removed from the site and what is potentially viable on that site and in some ways then bringing back as I think Commissioner Garber mentioned, responding to the needs of the community and the neighborhood in terms of a viable shopping center.

Now I'm going to put that aside for the time being and I'm going to comment on what I like about or what I see in the EIR that I do like. I like what's being proposed here in terms of moving the building. I think its appropriate and what I think is important about it is that right now there is a side of building 1 and a side of building 2 that is basically obscured by each other and if those buildings were rearranged on the site in a way that they were obscuring other elements or other parts of the building, I would say that doesn't work but these are actually being **17.2**

disconnected and moved apart in a way that it doesn't really change the overall viewing ability or the viewing of any of these existing historic buildings.

There are examples of how we have taken houses in Palo Alto, historic houses, and have literally in the SOFA area moved them one block from the corner of Homer Avenue down to Addison or Channing and the historic fabric of the neighborhood remains intact and the context of those buildings or houses remain totally intact and in some ways that is what is being proposed here, moving a single building so the adjacency changes a tiny bit. That shopping center will be felt and will be perceived exactly as that shopping center has always been and so first of all, I'm not going to be here for the final, whatever action the Board takes here but I have no problem with regard to moving on the sufficiency of this EIR the way it is right now sans of course the public comments that will be coming in. But I think what's being proposed here is very appropriate. It's needed by the community. It's needed by the developer in terms of moving forward with this and I wouldn't have any problem at some point voting on some kind of a motion of overriding consideration in terms of relocating that building. So those are my comments.

17.2

Chair Martinez: Thank you. In the interest of the city getting its money's worth, I'd like our consultant from Carey and Company to step up if you may. Mr. Borock, if I overstep my bounds the City Attorney here will sensor me.

I happen to be a great fan of Quincy Jones and I grew up in L.A. and as a kid I would drive up to the Hollywood Hills and look at the case study houses and it really motivated me and I was very disappointed when I didn't get into USC. I had to settle for Berkeley. Sorry about that… And Harvard.

I tried to see if I could find any work by Jones on urbanism, on you know, on sort of community design and I didn't see anything. Is there a part of his legacy that speaks to that?

Mr. Duncan: To my knowledge not. He was an architect's architect and like so many architect he tended to be building centric. A good landscaping friend of mine accuses me of building centric only because I tend to forget the trees. To my knowledge he didn't write anything about that but he was a man that was a product of his time and many of the principles of the kind of urbanism and urban theories that came after the Second World War were things he just naturally engaged because that was the environment in which he practiced but to my knowledge he wrote no scholarly papers or put forth any positions.

Chair Martinez: So you're kind of speculating on that. In your opinion, is his an example of his best work?

Mr. Duncan: No, quite frankly its not. I think we all know that his opus has some brilliant and inspiring pieces in it and a few rather mundane, fairly simple glass boxes on a site is not a master work by any stretch.

Chair Martinez: I feel like an attorney. And in your own work, have you ever recommended and how do I say, sort of maintaining a project that is really poor design?

Mr. Duncan: That's actually a really good question. If I could kind of turn your question around a little bit, there's an elephant in the room in the process here that we may not be seeing. As a

preservation architect I am obligated to the CEQA process. I stand by my feeling that to answer Mr. Lippert's question, the grocery building in our point of view is historic because of its site location, because of the principles of post-war urbanism that sited it although the building's fabric may have been compromised. If you pull back to 30,000 feet and look at that site it's a very fine example of that kind of urban design.

If I take that hat off and I put on my architect hat, I'm a great proponent of new urbanism and mixed use and housing being right next to commercial so we don't have to bike as far, so we don't have to drive and if you stop and think about it the post war urban design principles are exactly those things that we're trying to design against today and that's the elephant in the room and that's in part the conflict that we all have here because you can say it's a bad design. The right way to say it is it's a design based on an urbanistic principle that no longer suits us today so its not bad, it was good in its day and it was heralded however, its no longer appropriate to the world in which we live and so our task to a great degree here is finding a way of maintaining its historic character as much as possible and successfully adaptively reusing it within the context of the standards. I don't know if that answers your question.

Chair Martinez: It absolutely does and I appreciate your candidness about that. So if I may conclude then you're saying that the proposed design is actually superior to what exists there now. Yes.

Mr. Duncan: I'm saying that it solves a myriad of problems for our time and it solved problems on its own terms in its time. It's just aged badly. We've changed. I think if we take the fact that there are I think two significant unavoidable impacts, just in terms of the CEQA process only, not in terms of what we like about the project or what we think. This is about the CEQA process and I think we can get to the point of a project if we acknowledge the fact that there are two unavoidable impacts at which point there is a process which is overriding considerations that allows you to find that its okay to tweak this side of it to make it work better for us in 2011 and that's essentially what this is about. It's about following that process.

Chair Martinez: Thank you very much. I really appreciate that. Staff, can we incorporate that in the comments, please. Commissioner Lippert.

Commissioner Lippert: I have one follow up question on that. I agree with what you said in terms of the siding of the buildings but it's also known in historic preservation principles to acknowledge a footprint and yet replace what is there if its not working and that's another approach. Is that not fair to say?

Mr. Duncan: That's not done very commonly and I can't think of any example of that.

Commissioner Lippert: Let's give you an example. Ben Franklin's house in Philadelphia.

Mr. Duncan: The reasons for that are because there was no documentary evidence of Franklin's house and Robert Venturi was given the task of doing a Franklin museum because the standards very clearly say you cannot reconstruct without documentary evidence. Venturi made a ghost house and it was a cartoon of what the house might have been and if you walk through the white steel frame he made an imagined plan of what the house might have been based on archaeological evidence they found. So the fireplaces, as you look down and they're in just the

right place, because its in the standards that you cannot reconstruct without drawing evidence or photographic evidence which of course we wouldn't have that, he had to make it up.

Commissioner Lippert: But by the same token, and I appreciate your presentation and line of rationale, there is a point where enough of a building has been taken away where it ceases to have its historic fabric intact.

Mr. Duncan: That's correct.

Commissioner Lippert: And that in fact one of the best approaches might be to remove the rest of that material and keep in place some of the elements that are original and re-improve the structure to the point that it functions and you can identify the parts that are new and the parts that are old. What comes to mind is for instance, its deterioration of windows for instance. Its not uncommon for wood windows, even steel windows to deteriorate and having to be replaced and try to replicate what those windows might be could in fact be very costly but it still is not the original windows therefore using a different kind of window to contrast what was there so you can distinguish new and old is a fair approach.

Mr. Duncan: That is correct. In fact, I had a site meeting in Mountain View that addressed that just the other day. There were a number of historic windows that were removed and we opted to use windows that were similar to the historic windows that survived using the same proportion but not to put the mutton bars in because they were multi-divided lights and we thought we'd just put single light windows in. They were the same proportion and the same material but it makes a distinction between what's old and what's new while being contemporary and compatible with the historic fabric of the building. I think that's what you're saying.

Commissioner Lippert: Correct. So if I were to go so far, and I haven't analyzed the grocery building and what has been undermined there, but if what characterizes Quincy Jones' architecture really is that siding and the use of laminated beams and glass and once those become impacted and removed it ceases to be in some ways a Quincy Jones building, it becomes an outline similar to the Venturi house.

Chair Martinez: Thank you very much. A couple comments. I think the DEIR is way too long. It's very repetitive. It's got a lot of stuff in there that we hear over and over again. I'm not asking you to go back and thin it out but I think for me and maybe for others it really was daunting. It sat on my coffee table for days. It was intimidating and I would like to see a way to reduce the volume of that. Secondly, related to that, I would like to see a better Executive Summary. This is where it could be longer. It's very brief. It doesn't really outline the issues and state its conclusions well at all so I think it would be very helpful for that to be done. I think Commissioner Garber had a final comment. **18.1**

Vice-Chair Garber: Just a couple of comments. I think you've already recorded my comments regarding children routes to school but in particular some discussion about the intensity of use that will occur or we would anticipate to occur and specifically about children and the safety of the streets and the pedestrian bike traffic that will occur at that portion of the site. Those are all issues that are covered in the Comp Plan and can be wrapped into some discussion. **19.1**

The other comment regarding the third alternative, the reduced residential alternative. Presumably that allows for an enlarged park area or at least outdoor area. There are potentially opportunities there that can be mentioned in terms of either dedicated park land, outdoor space. I don't know what they all are but it seems to me there should be some fuller discussion on that and those opportunities with that alternative. **19.2**

Chair Martinez: Commissioners, any final comments? I had one request and City Attorney you can give me a little guidance if I can't do this but there is going to be a meeting in a week or so on this project for the ARB and I wanted to ask if you had any recommendations that you wanted to pass forward to them.

Mr. Larkin: It's not the place of the Commission to advise the ARB or make recommendations to the ARB but to the extent that there are comments on the esthetic sections of the EIR those are appropriate comments to make. Comments on sections of the EIR that you would like the ARB to look at.

Chair Martinez: In that regard, Commissioners, I have a couple. One is I'm concerned esthetically about the relationship of the back wall of the grocery store to the residential units. There's about six feet there and it seems like a design flaw. **20.1**

Second, in regard to the historic quality of the grocery store, the screening on the rooftop is pretty heavy looking and I would like to see that addressed. **20.2**

Third, it didn't come up and I'm kind of surprised but the proposed landscaping, I'm wondering whether it is appropriate to the historic site and it should be addressed in the EIR or for follow up by the ARB. Anyone else? Commissioner Tanaka. **20.3**

Commissioner Tanaka: You did make me think about one thing. I heard a comment earlier and actually I agree with it but I think a lot of the surrounding neighborhood, the housing is not as large as the houses being contemplated here and I think having the housing sizes and comparisons to the neighboring houses around there make a lot of sense. The alternative of reduced residential may want to contemplate maybe smaller houses instead so smaller, higher, denser houses because I also agree with the Chair that it does seem a little bit jarring, the back of the grocery to the housing. There should be some sort of transition because you're going from single family to commercial and it doesn't seem to fit very well. **21.1**

I think to fall into Commissioner Lippert's comment about the historic fabric being disturbed, I do agree it's a pretty big impact to the historic fabric but that's balanced out by hopefully improved economic viability and hopefully public benefit so if perhaps there was a reduced residential there would be a bigger park and that's going to be a bigger benefit for the surrounding community. Thank you. **21.2**

Chair Martinez: Anyone else? Okay, again I forgot this. The public hearing will close and this item is complete. Thank you all very much.

Okay, we have a couple of items. We have some minutes to approve and I had suggested earlier that we continue this but our minutes are kind of backing up and I wanted to see if we could

either approve them as is or if there are any amendments to the September 14th minutes. Commissioners? Well, Commissioner Garber.

Vice-Chair Garber: I move that we approve them.

Commissioner Tuma: Second.

Chair Martinez: I have some corrections. On the second page there is reference to Vice-Chair Lippert and it is Vice-Chair Fineberg and also in several places BMR is VMR and that should be corrected. That appears four or five times and in the applicant statement she was referring to R1 and it reads as R18. I think Commissioner Tuma was called Chair Tuma in a couple of places. Those are the amendments I suggest.

So do we vote on it? All in favor of the amendment? Aye.

(Minutes approved - Commissioner Garber, Commissioner Lippert, Commissioner Tanaka, Commissioner Tuma, Chair Martinez all vote Aye.)

It passes with the changes proposed by the Chair.

Any reports? Commissioner Tanaka.

Commissioner Tanaka: I do have something about the IBRC, Infrastructure Blue Ribbon Commission. So, at the last Commission meeting the IBRC voted that to make a recommendation to form a futures commission or a commission that is more focused around infrastructure. There was a lot of debate about it and a lot of discussion. One of the debates was there is a lot of charter overlap with the Commission's charter so I thought the Planning Commission should be aware of that and maybe this will be a topic one day. Thanks.

Commissioner Garber: The Comp Plan amendment subcommittee met today. We continue to work on the community services element and the staff will bring the housing element back to the Planning Commission on December 7th. I'll keep you apprised on the other items as we move forward.

Chair Martinez: I would be amiss if I didn't say with some regret that this is the last meeting of Commissioner Lippert after 8 years of service. You've been a tremendous friend and colleague and I'm really going to miss your wit and every time that you mention SB375 the way your voice would crack, it's just not going to be the same. I just want to thank you for being a partner here.

Commissioner Garber: I'd like to thank the Chair for bringing that comment up and I would like to add my thanks and fond farewells to Commissioner Lippert and we look forward to seeing him at all of the Commission Oral Report opportunities to remind us of the things that we are not doing. I look forward to thank.

Commissioner Tuma: So I guess I knew the process was moving forward but I didn't know tonight was actually the last night so we'll have a new Commissioner before long and hopefully that Commissioner can over time, and it will take quite a long time, but the input, wisdom that all

your years of experience both on the ARB as well as on this body have had a significant impact and we're going to miss you.

Commissioner Tanaka: I also want to thank you for your service. It's a lot of service to give to the city so we all appreciate it. I also want to thank you for your help and guidance when I was a new Commissioner and helping me figure out some things so thank you.

Commissioner Lippert: First of all, I want to say that it really has been a distinct honor and a pleasure to serve not just with you but with all of the people I've served with here both Commissioners as well as City Staff and members of the public including Herb Borock. I have learned as much from each of you as hopefully I've contributed to this Board. I may not have agreed with all of your opinions but one of the things you have done is engaged me, challenged me, convinced me and enlightened me and that will be something I always carry with me so thank you for your collegiality and your friendship. With that, I would like to invite you and City Staff to join me for a drink afterwards. Thank you.

Chair Martinez: Not so fast, buckaroo. I've assigned you one more responsibility for the Planning Commission and that's to be our representative at the ARB when they hear the last item if you would kindly do so.

Mr. Williams: From staff standpoint I would like to thank Commissioner Lippert and former ARB Member Lippert and he's been hanging around our office a long time and we're better for it and the city is better for it as well. Maybe you'll get back to the ARB. Is that a possibility I understand?

Ms. French: I too appreciate all the service, having sat through all the ARB meetings you sat through and I appreciate your years of service and excellent comments. Thank you.

Chair Martinez: Thank you all. Yes, City Attorney.

Mr. Larkin: I can't be the only one not to say anything. I told you this privately and I'll say it publicly. We're going to miss you on the Commission. I appreciate all the work you've put in. You've been on the Commission just a little bit longer than I've been with the City. I appreciate the amount of work you've put into this.

Chair Martinez: So it may be time to go Don. With that, the Commission meeting is adjourned.

ADJOURNED: 8:35 PM

Response to Comment 1-1 [Commissioner Lippert]

Under the CEQA Guidelines, Section 15064.5 "Determining the Significance of Impacts on Historical and Unique Archaeological Resources," "historical resources" can include those determined to be eligible for the California Register of Historical Resources, those listed in a local register of historical resources or identified as significant in an historical resource survey shall be presumed to be historically or culturally significant. The Guidelines also state that public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

Edgewood Plaza has been evaluated and identified as eligible for the California Register by qualified architectural historians, including Ward Hill (2002), Page & Turnbull (2009), and Carey & Company (2010), and therefore is considered a historic resource by the City of Palo Alto.

Response to Comment 2-1 [Jeff Levinsky]

The complete letter and cover letter submitted by Mr. Levinsky are included in this Final EIR, and are identified together as Comment Letter F.

Response to Comment 2-2 [Jeff Levinsky]

Please refer to Responses F-1 through F-5.

Response to Comment 2-3 [Jeff Levinsky]

The office building at 1101 Embarcadero Road that was part of the original Eichler development is not included in the proposed project, and there would be no direct, physical modifications to this structure. Under the project, the parking supply allocation for the office at 1101 Embarcadero Road would not change compared to existing conditions, as noted in Table 14.16-8 of the Initial Study (Page 121 of Appendix C of the Draft EIR). As noted in Response F-2, if the owners of the building at 1101 Embarcadero Road submit an application for a project on that site for redevelopment or reuse, the parking supply and any potential impacts to the office building would be reviewed by the City at that time. The proposed project, therefore, would not result in direct or indirect historic resources impacts to this building.

Response to Comment 2-4 [Jeff Levinsky]

The commenter's opinion regarding enforceable rules independent of site ownership is noted. As these comments do not address the analysis in the EIR, no further response is required.

Response to Comment 2-5 [Jeff Levinsky]

Please see Response F-2 and Response 2-3.

Response to Comment 3-1 [Beth Bunnenberg]

The commenter's opinion on the significance of impacts to historic resources on the site and the review process are noted, and will be considered by the decision-makers during the hearings on the project. Historic resources impacts from the proposed project are identified in the EIR.

Response to Comment 4-1 [Robert Moss]

The approximate overall FAR for the proposed residential units is 0.20, and FAR for the individual houses range from 0.67 to 0.86. While this is greater than the typical FAR for single-family residences in the surrounding neighborhood, Planned Community zoning districts in Palo Alto are intended to accommodate developments for a range of uses, allowing for flexibility under controlled conditions not attainable under other zone districts. These zones usually provide extensive flexibility for the applicant and the community to negotiate an appropriate land use and design solution for a given site. The advantages of the Planned Community zone are that maximum flexibility is provided for innovative design and deviations from the standard requirements for similar zoning districts (including floor area ratio (FAR), and that the community may negotiate public benefits that would otherwise be unattainable.

FAR can provide a relative measure of site coverage and massing, though it is only one metric or factor that can be used to assess compatibility with adjacent or nearby development. It is not a measure of the quality of design or appropriateness of land use patterns at a particular location. The proposed residences will be located adjacent to commercial development, as well as being across the street from existing single-family residences.

Response to Comment 4-2 [Robert Moss]

The comment is noted, and will be considered by the City Council during their review of the project alternatives.

Response to Comment 4-3 [Robert Moss]

The comment is noted. As stated on Page 7 of the Draft EIR, the affordable or Below Market Rate (BMR) housing requirement would be satisfied either by providing affordable units and/or via payment of an in lieu fee based upon the market price of the units, in accordance with a BMR agreement per City requirements.

The City and the applicant will determine which method would be used to fulfill this requirement following approval of the project and the development of a BMR agreement.

Response to Comment 5-1 [Adena Rosmarin]

Please refer to Response G-1, above.

Response to Comment 5-2 [Adena Rosmarin]

Please refer to Response G-2, above.

Response to Comment 5-3 [Adena Rosmarin]

Please refer to Response G-4, above.

Response to Comment 5-4 [Adena Rosmarin]

Please refer to Response G-5, above.

Response to Comment 5-5 [Adena Rosmarin]

Please refer to Responses G-6 and G-8, above.

Response to Comment 6-1 [Jon Foster]

The commenter's opinions on historic preservation and building relocation are noted, and will be considered by the decision-makers during their review of the project.

Response to Comment 6-2 [Jon Foster]

The commenter's opinion on the neighborhood moving one building to accommodate the project design is noted, and will be considered by the decision-makers during their review of the project.

Response to Comment 7-1 [Herb Borock]

The comment regarding the comment process on the Draft EIR at the Planning Commission meeting is noted. As it does not address the adequacy of the analysis in the EIR, no additional response is required.

Response to Comment 7-2 [Herb Borock]

The comment regarding a previous speaker's statements on the comment process and hearings is noted. The date for the end of the comment period did not change, and the clarification was made at the Planning and Transportation Commission meeting by staff. Please also refer to Response G-1, above.

Response to Comment 8-1 [Vice-Chair Garber]

The project's traffic impacts were studied in the transportation impact analysis (or TIA), which is included as Appendix O of the Initial Study (Appendix C of the Draft EIR). The traffic impacts of the project are also discussed in *Section 4.16, Transportation,* pages 105-122 of the Initial Study (Appendix C of the Draft EIR).

An identified significant impact at an unsignalized intersection (Wildwood Lane-North California Avenue, and Embarcadero Road), would be reduced to a less than significant level with mitigation included in the project. Traffic impacts to other intersections studied within the residential neighborhoods would be less than significant. A neighborhood street analysis, using the Traffic Infusion on Residential Environment (TIRE) method conducted for Greer Road, north of Oregon Expressway, found that project traffic would not exceed the volume threshold considered to be noticeable to street residents (see *Section 4.16.2.2, Transportation Project Conditions*, in the Initial Study, Appendix C to the Draft EIR).

Response to Comment 8-2 [Vice-Chair Garber]

The visual impacts of the proposed residential development are addressed in *Section 4.1, Aesthetics,* of the Initial Study, Appendix C to the Draft EIR. The land use compatibility impacts of the project are described in *Section 3.1.4.3, Land Use Compatibility,* page 29 of the Draft EIR. Based on the analysis in the Draft EIR, the increase in bulk and massing would not result in a significant land use impact.

Please also refer to Response 4-1 for a discussion of the floor area ratio (FAR) proposed for the residential uses on the site.

Response to Comment 8-3 [Vice-Chair Garber]

The project's bicycle and pedestrian facilities are described in the transportation impact analysis (or TIA), which is included as Appendix O of the Initial Study (Appendix C of the Draft EIR), and *Section 4.16* of the Initial Study, pages 106 and 126.

Pedestrian and bicycle access from the residential neighborhoods to the project site was found to be adequate. Since the impacts were less than significant, no mitigation measures are required or proposed for bicycle and pedestrian access.

Response to Comment 8-4 [Vice-Chair Garber]

The Vice-Chair's concerns regarding pedestrian safety are noted. Apart from the addition of ten single-family houses and the small park, the proposed uses at the site are largely the same as they have been since the late 1950's. Substantial changes in the speed of cars, the need for additional stop signs, pedestrian safety issues, or other changes in project circulation have not been identified by the traffic analysis.

The City of Palo Alto will review the final project plans to verify compliance with City standards for pedestrian and bicycle safety during the permit process.

Response to Comment 9-1 [Commissioner Tuma]

The comment regarding the staff report and the Draft EIR are noted.

Response to Comment 9-2 [Commissioner Tuma]

Please refer to the responses to Comment Letter F regarding the parking for the office building at 1101 Embarcadero Road.

As described in Response to Comment F-1, under existing conditions the building has a legal agreement for 16 parking spaces on the Edgewood Plaza site and that parking supply appears adequate for the existing use of 1101 Embarcadero Road. As noted in Responses to Comments F-2 and F-12, speculation about other future tenants or uses and their parking demand at this building adjacent to the proposed project is beyond the scope of this EIR and environmental review under CEQA.

Response to Comment 10-1 [Commissioner Lippert]

The comment refers to the "No Project – Remodeling Scenario," as described on pages 81-82 of the Draft EIR. The buildings and the site have been recognized as eligible for the California Register of Historical Resources, and therefore is considered a historic resource under CEQA. The "No Project – Remodeling Scenario" assumes that a remodeling of the site (without the new housing and without moving Building 1) could be completed under the *Secretary of the Interior's Standards for the Rehabilitation of Historic Properties.* The requirement to restore the buildings to these standards under this scenario could be triggered by a discretionary permit, which would require architectural review, or the renovation could be completed to these standards voluntarily by a project proponent.

This scenario was described to present an alternative to the project that would reduce the significant, unavoidable historic resources impacts of the project to a less than significant level. Theoretically, the buildings could also be renovated or remodeled to some extent without triggering a discretionary permit that would require architectural or environmental review and some types of remodeling (such as the replacement of building materials) could in fact adversely impact the historic resources on the site. This intermediate "No Project" alternative was not described in the Draft EIR, as it does not present the decision-makers with an additional alternative to the project that would substantially lessen or avoid the significant effects of the project, and cannot be considered an environmentally superior alternative. The two "No Project" alternatives described in the Draft EIR provide an adequate range of scenarios for discussion and consideration.

Response to Comment 11-1 [Commissioner Tanaka]

Please see Response 4-1, above, for a discussion of floor area ratio (FAR).

Response to Comment 11-2 [Commissioner Tanaka]

The question on "private streets" may be referencing the ordinance change that defined private streets, where private streets would be netted out of the square footage that would be used to calculate the amount of FAR that would be allowed for a project site would be allowed. This calculation is more correctly applied to projects developed under conventional zoning regulations. In the case of Edgewood Plaza, this calculation would not apply, because as a PC zoning, the site-specific ordinance would establish the allowed square footage. If the proposed project was not a PC zoning, it still would not be applicable because the driveways for the residential units would be considered driveways, not private streets. The definition of "private streets" is as follows (Palo Alto Municipal Code, Title 21, Chapter 21.20.240, "Widths"):

> (30) "Private street" means any right-of-way, including vehicular access easements, not dedicated as a public street which is used for vehicular traffic to or from two or more which do not have frontage on a public street, or to or from one parcel which does not have frontage on a public street if the right- of-way or easement used for ingress or egress is more than two hundred feet in length. For the purpose of this section, "parcel" includes fee ownership, condominium, townhome or other ownership configurations. Private streets shall be excluded for the purpose of determining Floor Area Ratio (FAR). Minimum width of "private streets" shall be as defined in 21.20.240 (b)(4). For the purpose of the provisions of 21.20.240 (b)(4), the term "lot" includes fee ownership, condominium, townhome or other ownership configurations.

Response to Comment 12-1 [Chair Martinez]

The CEQA Guidelines, Section 15126.6(e), describe how the "No Project" alternative should be analyzed, which includes a discussion of what would reasonably be expected to occur in the foreseeable future if the project were not approved. The "No Project" alternative is described starting on Page 81, *Section 7.2.1* of the Draft EIR. The Draft EIR acknowledges that the shopping center could continue to deteriorate and become increasingly more vacant without remodeling or renovation for new tenants.

By themselves, the economic impacts of the continued vacancy of Edgewood Plaza and the lack of a grocery store in the neighborhood would not be considered as environmental impacts under CEQA.

Response to Comment 13-1 [Chair Martinez]

The project's consistency with the Palo Alto Comprehensive Plan is discussed in *Section 3.1.4.4* of the Draft EIR, pages 29-32, and a summary is included with this Final EIR as Appendix D to the EIR. Section 15125(d) of the CEQA Guidelines requires an EIR to discuss any inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans.

Please see the text revisions to page 32 of the Draft EIR in *Section 6.0*, below, regarding a conclusion of consistency with land use policies in the Comprehensive Plan.

Response to Comment 13-2 [Chair Martinez]

Please refer to Appendix C of this Final EIR for a summary of the relevant Comprehensive Plan policies discussed in the EIR.

Response to Comment 14-1 [Vice-Chair Garber]

The Vice Chair's opinion on the design and historic context of the Edgewood Plaza and the potential impacts of the project is acknowledged. As these comments do not raise issues related to the analysis in the EIR, no further response is required.

Response to Comment 15-1 [Commissioner Tuma]

The Commissioner's opinion on the potential benefits of the Edgewood Plaza project is acknowledged. As these comments do not raise issues related to the analysis in the EIR, no further response is required.

Response to Comment 16-1 [Commissioner Tanaka]

The Commissioner's opinion on the economic viability of the Edgewood Plaza and the introduction of residential uses on this retail site are acknowledged. As these comments do not raise issues related to the analysis in the EIR, no further response is required.

Response to Comment 16-2 [Commissioner Tanaka]

Please refer to the Responses to Comment Letter F and Comment 9-2 above, for information on the provision of parking by the project.

Response to Comment 16-3 [Commissioner Tanaka]

The comment regarding a retail analysis is noted. Projections of the long-term viability of retail uses on the site and/or the adjacent office use is beyond the scope of environmental review required under CEQA.

Response to Comment 17-1 [Commissioner Lippert]

The Commissioner is describing an alternative design scenario where the grocery building is demolished, and housing is integrated into that building and/or its former site. As described above, the alternatives included in the Draft EIR (except for the No Project alternative) were developed to provide the decision-makers with a reasonable range of alternatives that would substantially reduce

significant impacts, including impacts to historic resources, while still meeting the basic objectives of the project.

Removal of the grocery store building would reduce the proposed commercial uses on the site from approximately 39,000 square feet to 17,800 square feet in two buildings. It would not meet the basic project objectives of reuse and repurposing of the existing commercial buildings on the site, providing a new grocery store within the previously existing grocery building, or rehabilitating the three existing buildings on the Edgewood Plaza site. To the extent that amount of commercial building space would be reduced, it also may not wholly meet the project objectives related to redeveloping the property with economically viable commercial uses, or City of Palo Alto goals regarding *Neighborhood Commercial* redevelopment on the Edgewood Plaza site.

Carey & Company, as the consultants for the City of Palo Alto, have recognized the Edgewood Plaza in its entirety as a historic resource for its overall site design and layout, although they did not consider the grocery building to have historic integrity on its own (see discussion on pages 49-53 of the Draft EIR) Since demolishing the grocery building and replacing it with housing would also impact the overall original site design and layout, this would likely result in a significant unavoidable historic impact in respect to the overall site.

For these reasons, this alternative would not fulfill the basic project objectives, and it would not be clearly environmentally superior to the project. This additional design alternative, therefore, has not been added to the alternatives analysis in the EIR.

Response to Comment 17-2 [Commissioner Lippert]

The Commissioner's opinion regarding the appropriateness of relocating Building 1 under the proposed project is noted.

Response to Comment 18-1 [Chair Martinez]

The Planning Commission Chair's opinion on the length of the Draft EIR is noted.

Please also see the response to Comment Letter I-2, above, regarding the contents of the Draft EIR Summary section.

Response to Comment 19-1 [Vice-Chair Garber]

Please see Response 8-4, above. Channing Avenue from West Bayshore Road to Guinda Street is identified as a School Commute Corridor, as part of the Safe Routes to School/Traffic Calming program. The School Commute Corridors Network designates a sub-set of Palo Alto's street system for special consideration in infrastructure improvement and travel safety enhancement. The proposed project would not conflict with this policy.

Response to Comment 19-2 [Vice-Chair Garber]

Please see the text revisions to pages 85 and 86, in *Section 6.0*, below.

Response to Comment 20-1 [Chair Martinez]

Following this Planning and Transportation Commission (PTC) meeting on October 26, 2011, the project was reviewed by the Architectural Review Board (ARB) on November 3, 2011. The back wall of the grocery store was discussed, and the applicant provided further details on the design. The

ARB asked the applicant for design changes to the project, which will be reviewed at the ARB meeting currently scheduled for February 2, 2012. The PTC will have an opportunity to review the revised plans for the site following that ARB meeting.

Response to Comment 20-2 [Chair Martinez]

Following this Planning and Transportation Commission meeting on October 26, 2011, the project was reviewed by the Architectural Review Board (ARB) on November 3, 2011. The roof screening of the grocery store was discussed, and the applicant provided further details on the design. The ARB asked the applicant for design changes to the project, which will be reviewed at the ARB meeting currently scheduled for February 2, 2012. The PTC will have an opportunity to review the revised plans for the site following that ARB meeting.

Response to Comment 20-3 [Chair Martinez]

The existing landscaping on site was not identified as part of the historic resources on site by either Page & Turnbull or Carey & Company. No significant historic impact would occur to the resources on site from the addition of new landscaping at the site.

Response to Comment 21-1 [Commissioner Tanaka]

Please refer to Response 20-1, above.

Response to Comment 21-2 [Commissioner Tanaka]

The comment is noted.

SECTION 6.0 REVISIONS TO THE TEXT OF THE DRAFT EIR

Section 6.1 of this Final EIR contains text revisions to the *Draft Environmental Impact Report, Edgewood Plaza Project,* dated September 2011. **Section 6.2** of this Final EIR contains text revisions to the *Initial Study, Edgewood Plaza Project,* Appendix C to the Draft EIR. Underlining depicts text added, while ~~strikeouts~~ depict text deleted.

6.1 REVISIONS TO THE TEXT OF THE DRAFT EIR

Page vi: **REVISE** the *Summary,* as shown.

SIGNIFICANT ENVIRONMENTAL IMPACTS	MITIGATION MEASURES
Cultural Resources	
Impact CR-2: The Edgewood Plaza site is considered historically significant under federal, state, and City of Palo Alto criteria. Relocation of Building 1 ~~and the marquee sign~~ on the site would alter the overall site design and characteristics of Edgewood Plaza, and therefore this relocation would result in a significant impact to historic resources. **[Significant Impact]** **Impact CR-3:** The Edgewood Plaza site is considered historically significant under federal, state, and City of Palo Alto criteria. Construction of ten new single-family houses on the site would alter the overall site design and characteristics of Edgewood Plaza, and therefore this construction would result in a significant impact to historic resources. **[Significant Impact]**	The proposed project would impact the site by relocating one of the retail buildings ~~(and the marquee sign)~~ (**Impact CR-2**), and by constructing ten single-family houses on the site (**Impact CR-3**). The following mitigation measures ~~would reduce these impacts, although not to a less than significant level.~~are included in the project: **MM CR-2.1:** Historic American Buildings Survey (HABS) Level III documentation of the exterior of Buildings 1 and 2 and their setting shall be prepared by the applicant and project consultants prior to the relocation of Building 1 and remodeling of Building 2. Following the HABS guidelines, this documentation shall include: • Sketch plan of the existing site and reproduction of original drawings. • Up to 12 large-format photographs (4 by 5 inches) of exterior views. • A written summary of project site's history. • Transmittal of one set of documents to the Historic Resources Planner in the City of Palo Alto Planning and Community Environment Department, and to a relevant local historical society, library, or repository. ~~full measured drawings, large-format photography, and an historical overview of both Buildings 1 and 2.~~ The documentation shall be filed by the applicant ~~with City of Palo Alto Historic Preservation Officer,~~ prior to the start of

SIGNIFICANT ENVIRONMENTAL IMPACTS	MITIGATION MEASURES
	construction. **MM CR-2.2:** The applicant shall create a display illustrating the history of the Edgewood Plaza as built by Eichler Homes ~~on the site and in the vicinity~~, prior to approval of final occupancy. **MM CR-2.3:** Distinctive materials and defining architectural features, finishes, and construction techniques of Buildings 1 and 2 including windows, frames, and eaves will be retained~~.~~ to the extent possible, as the building elements will require some alterations due to ADA compliance, public safety, building code compliance, or deteriorated condition. The existing building components may be constructed out of new building materials that match the character and form of the existing, if reuse of existing building components is not feasible. Prior to the ~~Following the~~ relocation and reconstruction of Building 1 and the rehabilitation of Building 2, a qualified historic preservation architect shall review the plans for the remodeled buildings and verify that ~~historic façade elements have been adequately installed, and that~~ the work on these buildings is in keeping with the buildings' original design and applicable Secretary of the Interior's *Standards for Rehabilitation*, such as Standards #5, 6, 7, and 9. The final design and materials to be used in the renovation of these buildings will be reviewed and approved by the Director and the Historic Resources Planner of the City of Palo Alto Planning and Community Environment Department. ~~Preservation Officer and Building Official. A report shall be submitted to the Historic Preservation Officer and Building Official following completion of the relocation and reconstruction, and prior to approval of final occupancy.~~ **[Significant Unavoidable Impacts]**

SIGNIFICANT ENVIRONMENTAL IMPACTS	MITIGATION MEASURES
Hazardous Materials	
Impact HAZ-1: Excavation during	**MM HAZ-1.1:** Considering the property will be

construction of the proposed project could expose construction workers and others to residual hazardous materials contamination in soil and groundwater. **[Significant Impact]**	redeveloped and that potentially regulated soils may be encountered during site preparation activities, a Soil Management Plan (SMP) shall be prepared to reduce or eliminate exposure risk to human health and the environment. The SMP shall be developed to establish management practices for handling contaminated soil or other materials if encountered during construction activities. The SMP shall be reviewed and approved by the City of Palo Alto prior to commencing construction activities. **MM HAZ-1.2:** Each contractor working at the site shall prepare a health and safety plan (HSP) that addresses the safety and health hazards of each phase of site operations that includes the requirements and procedures for employee protection. **MM HAZ-1.3:** At the time Building 1 is moved, soil and groundwater samples, and/or soil vapor samples, if appropriate, shall be obtained from under 2125 Saint Francis Drive (the former Moon Cleaners) to ensure that soil exceeding the applicable levels for tetrachloroethene (PCE) and its breakdown products is not present within five feet of the ground surface. PCE-affected soil shall be removed by properly trained and licensed personnel and contractors, in conformance with procedures in the soil management plan (**MM HAZ-1**) prior to paving the area. Contaminated soil will be handled by trained personnel using appropriate protective equipment and engineering controls, in accordance with local, state, and federal laws. An excavation base confirmation sample will be collected and analyzed to document sufficient soils removal. Documentation of removal of PCE-affected soil shall be provided to the City of Palo Alto and appropriate oversight agencies prior to installation of pavement in the parking lot area. **MM HAZ-1.3~~3~~4:** Excavated soils will be characterized prior to off-site disposal or reuse on-site. Appropriate soil characterization, storage, transportation, and disposal procedures shall be followed. Contaminated soils shall be disposed of at a licensed facility in accordance with all appropriate local, state, and federal regulations~~.~~, in accordance with its characteristics.

	MM HAZ-1.5: The applicant shall prepare a contingency plan prior to the beginning of the project construction that will address any previously unknown sumps, hydraulic hoists, or tanks that may be present in the area of work. **[Less than Significant Impact with Mitigation Measures Incorporated in the Project]**

Page 6: **REVISE *Section 2.3.1, Site Development Overview*,** as shown.

The grocery building would remain in place and be renovated to allow for use as a small-scale grocery store. ~~The walkway between the grocery building and Building 2 would be enclosed and remodeled into a 1,100 square foot connector vestibule~~.

Page 6: **REVISE *Table 2.3-1*,** as shown.

Table 2.3-1
Summary of Proposed Development

Land Use	Development Area in Square Feet	Buildings	Building Area in Square Feet
Commercial (2.73 acres)	119,000[2]	Building 1	10,000
		Building 2	7,800
		Grocery Building	~~20,100~~ 20,600
		~~New Building Vestibule~~	~~1,100~~
		Total Retail Buildings	**~~39,000~~ 38,400**
Residential (0.85 acre)	36,900	**Total Residential Buildings**	**~~28,800~~**[1] **31,300**[1]
Total Project Site (3.58 acres)	**155,900**	**Total Buildings:**	**~~67,800~~ 69,700**

[1]Total building area, including garages.
[2] Includes approximately 10,000 square feet of area for the proposed park.

The existing vacant grocery store contains approximately 20,100 square feet of space, including 6,000 square feet used for storage and warehousing (with 3,000 square feet of this space in a mezzanine). The grocery store would be renovated in place~~, and the walkway between the grocery building and Building 2 would be enclosed and remodeled into a 1,100 square foot connector vestibule~~. The height of the east end of the grocery building ~~would be raised from 27 to 30 feet~~ would be a maximum of 25 feet. New metal panel roof screens to would be installed to conceal mechanical equipment on all three of the commercial buildings.

Page 32: **REVISE *Section 3.1.4.4, Consistency with the Palo Alto Comprehensive Plan,*** as shown.

The proposed project would be consistent with the *Neighborhood Commercial* land use designation for the site, and would be substantially consistent with the applicable policies of the Comprehensive Plan. **[Less than Significant Impact]**

Page 48: **REVISE *Section 3.2.4.1, Eligibility of Edgewood Plaza for the National Register of Historic Places (NRHP)*,** as shown.

Carey & Company felt that, even if the grocery building was not found to contain historic building materials under the exterior cladding, ~~and eligible under Criterion A,~~ it could be argued that its basic form was intact (i.e., feeling, association, setting, and location), especially if part of a historic district.

Page 49: **REVISE *Section 3.2.4.2, Eligibility of Edgewood Plaza for the California Register of Historical Resources (CRHR),*** as shown.

Criterion 2 (Persons)

The three buildings at Edgewood Plaza Shopping Center do not appear to have been associated with the lives of person important to local, California or national history, and are therefore not significant under this criterion. In determining the appropriate Criteria for eligibility, Criterion 3 is generally geared toward architects, engineers, and urban designers, and Criterion 2 is reserved for those outside the realm of Criterion 3 who have had an impact on society. The eligibility of Edgewood Plaza under Criterion 2 was considered by the historic consultants, but Criteria 1 and 3 appeared to be the more appropriate categories for listing under the CRHP.

Page 53: **REVISE *Table 3.2-4*,** as shown.

Table 3.2-4
Summary of Eligibility Determinations for Edgewood Plaza

Threshold	Criterion	Page & Turnbull	Carey & Company
National Register	A	Not evaluated	~~Not eligible~~ Site Eligible*
	C	Not evaluated	Site Eligible
California Register	1	Not eligible	Site Eligible
	3	Buildings 1 & 2 Eligible	~~Buildings 1 & 2 Eligible~~ Site Eligible*
Palo Alto Historic Inventory	3	Site Eligible	Site Eligible
	4	Site Eligible	Site Eligible
*Contingent upon the potential integrity of the building elements of the grocery building under later additions. This building was determined to lack integrity, following further investigation.			

Page 55: **REVISE *Section 3.2.5.3, Historic Resources Impacts***, as shown.

~~The walkway between the grocery building and Building 2 would be enclosed and remodeled into a 1,100 square foot connector vestibule between the buildings. A new clear glass storefront entry door would installed on the south end of the vestibule, and the north end of the vestibule (near the proposed residences) would be blocked off by a solid wall. The existing rafters and floating plane over this walkway would be removed.~~

Page 55: **REVISE *Section 3.2.5.3, Historic Resources Impacts***, as shown.

The marquee sign would be relocated ~~to a new~~ near the existing location on the site and new tenant signage would be added to it. ~~constructed along West Bayshore Boulevard.~~ The parking lot surrounding the commercial buildings would be altered with a modified parking layout, new interior driveway aisles, handicap accessible stalls, site drainage systems, and parking lot trees. Alterations are proposed to comply with current requirements for handicap accessibility, sustainability, and fire and building codes. Two of the existing entryways off West Bayshore Boulevard and Saint Francis Drive would be retained.

Page 56: **REVISE *Section 3.2.5.3, Historic Resources Impacts,*** as shown.

Both historic consultants agree that Buildings 1 and 2 can be considered historic resources. The project applicant proposes to relocate one of the retail buildings and rehabilitate both buildings ~~to the standards of the Secretary of the Interior's Standards and Guidelines for the Treatment of Historic Properties. Although not determined to be a historic resource due to loss of integrity, t~~The former grocery store would also be rehabilitated.

Page 56: **REVISE *Section 3.2.5.3, Historic Resources Impacts***, as shown.

The integrity of setting would not be substantially affected by the relocation of the marquee sign from its original location in the middle of the main parking lot to a new location nearby on the site. Page & Turnbull believes that the relocation of the marquee sign to a new location on the project site does not constitute a significant adverse impact, since a strong relationship is maintained between the sign and Buildings 1 and 2.

Page 57: **REVISE *Section 3.2.5.3, Historic Resources Impacts***, as shown.

Impact CR-2: The Edgewood Plaza site is considered historically significant under federal, state, and City of Palo Alto criteria. Relocation of Building 1 ~~and the marquee sign~~ on the site would alter the overall site design and characteristics of Edgewood Plaza, and therefore this relocation would result in a significant impact to historic resources. **[Significant Impact]**

Page 58: **REVISE Section *3.2.5.3, Historic Resources Impacts,* as shown.**

Based on the CEQA Guidelines, since there is disagreement among experts on the significance of the impact of the construction of the houses on site, this EIR will treat the effect as significant. The City's Historic Resources Board (HRB) has taken the position that the relocation of Retail Building 1 and the addition of residential homes to the site is not significant, and the rehabilitation of the two retail buildings is adequate to mitigate the alteration of the resource.[5] Several of the Board members also recommended modifying or not requiring all of the historic resources mitigation measures, particularly CR-2.1 and CR-2.2. The Palo Alto City Council will consider these opinions and ultimately make a decision regarding the significance of the impact.

Page 60: **REVISE *Section 3.2.6, Mitigation Measures,*** as shown.

Historic Resources Mitigation Measures

The Edgewood Shopping Plaza is considered eligible for the National Register of Historic Places and the California Register of Historical Resources. The proposed project would impact the site by

[5] City of Palo Alto, Historic Resources Board. October 19, 2011. The motion was passed by a vote of six to one.

relocating one of the retail buildings (and the marquee sign) (**Impact CR-2**), and by constructing ten single-family houses on the site (**Impact CR-3**). The following mitigation measures ~~would reduce these impacts, although not to a less than significant level.~~are included in the project:

MM CR-2.1: Historic American Buildings Survey (HABS) Level III documentation of the exterior of Buildings 1 and 2 and their setting shall be prepared by the applicant and project consultants prior to the relocation of Building 1 and remodeling of Building 2. Following the HABS guidelines, this documentation shall include:

- Sketch plan of the existing site and reproduction of original drawings.
- Up to 12 large-format photographs (4 by 5 inches) of exterior views.
- A written summary of project site's history.
- Transmittal of one set of documents to the Historic Resources Planner in the City of Palo Alto Planning and Community Environment Department, and to a relevant local historical society, library, or repository.

~~full measured drawings, large-format photography, and an historical overview of both Buildings 1 and 2.~~ The documentation shall be filed by the applicant ~~with City of Palo Alto Historic Preservation Officer,~~ prior to the start of construction.

MM CR-2.2: The applicant shall create a display illustrating the history of the Edgewood Plaza as built by Eichler Homes ~~on the site and in the vicinity~~, prior to approval of final occupancy.

MM CR-2.3: Distinctive materials and defining architectural features, finishes, and construction techniques of Buildings 1 and 2 including windows, frames, and eaves will be retained~~.~~ to the extent possible, as the building elements will require some alterations due to ADA compliance, public safety, building code compliance, or deteriorated condition. The existing building components may be constructed out of new building materials that match the character and form of the existing, if reuse of existing building components is not feasible. Prior to the ~~Following the~~ relocation and reconstruction of Building 1 and the rehabilitation of Building 2, a qualified historic preservation architect shall review the plans for the remodeled buildings and verify that ~~historic façade elements have been adequately installed, and that~~ the work on these buildings is in keeping with the buildings' original design and applicable Secretary of the Interior's *Standards for Rehabilitation*, such as Standards #5, 6, 7, and 9.

The final design and materials to be used in the renovation of these buildings will be reviewed and approved by the Director and the Historic Resources Planner of the City of Palo Alto Planning and Community Environment Department. ~~Preservation Officer and Building Official. A report shall be `submitted to the Historic Preservation Officer and Building Official following completion of the relocation and reconstruction, and prior to approval of final occupancy.~~

There is a disagreement among experts regarding whether the proposed mitigation would reduce historic resources impacts to a less than significant level. The circulated Draft EIR concluded that the mitigation measures listed above would reduce impacts to historic resources, although not to a

less than significant level. The City's Historic Resources Board (HRB) has taken the position that the relocation of Retail Building 1 and the addition of residential homes to the site is not significant, and the rehabilitation of the two retail buildings is adequate to mitigate the alteration of the resource.[6] Several of the Board members also recommended modifying or not requiring all of the historic resources mitigation measures, particularly CR-2.1 and CR-2.2. The Palo Alto City Council will consider these opinions and ultimately make a decision regarding the significance of the impacts and the effectiveness of proposed mitigation measures.

Page 60: **REVISE *Section 3.2.7, Significance Conclusions Regarding Cultural Resources Impacts,*** as shown.

Impact CR-2: The Edgewood Plaza site is considered historically significant under federal, state, and City of Palo Alto criteria. Relocation of Building 1 ~~and the marquee sign~~ on the site would alter the overall site design and characteristics of Edgewood Plaza, and therefore this relocation would result in a significant impact to historic resources. Mitigation measures would reduce this impact, but not to a less than significant level. **[Significant Unavoidable Impact]**

The City's Historic Resources Board (HRB) has taken the position that the impacts to historic resources on the site could be mitigated to a less than significant level by the implementation of mitigation measures. The Palo Alto City Council will consider these opinions and ultimately make a decision regarding the significance of the impacts and the effectiveness of proposed mitigation measures.

Page 68: **REVISE *Section 3.3.3.4, Fuel for Motor Vehicles,*** third paragraph, as shown.

As described in *Section 4.16, Transportation and Traffic* of the Initial Study, the project area is served by the Embarcadero Shuttle. There are on-street bicycle lanes (Class II) on Saint Francis Drive bordering the project site. These bicycle lanes continue west on Channing Avenue and connect to a pedestrian/bicycle bridge near Oregon Expressway, which extends across U.S. 101. There are no sidewalks or on-street bicycle lanes on West Bayshore Road, a frontage road bordering U.S. 101. The sidewalks, bike lanes, and paths that do provide access to the site provide facilities for pedestrians and bicyclists to access the Caltrain station and other destinations from the site. The variety of transportation options available to future residents and employees would reduce vehicle use.

Page 71: **REVISE *Table 4.2-1,*** as shown.

Table 4.2-1
List of Cumulative Projects (Continued)

Project Name	Location	Project Description
Stanford University Medical Center (SUMC)	The Main SUMC Site is south of Sand Hill Road and is primarily bounded to the north and east by Welch Road, to the south by Quarry Road, and to the west by Stanford University lands. The Hoover Pavilion Site is about 1,700 feet east of the Main SUMC Site, at the southwestern corner of	The SUMC Project would involve demolition, replacement, and expansion of existing medical facilities at the SUMC Sites, which are comprised of the 56-acre Main SUMC Site and the 9.9-acre Hoover Pavilion Site, adding approximately 1.3 million square feet of net new floor area,

[6] City of Palo Alto, Historic Resources Board. October 19, 2011. The motion was passed by a vote of six to one.

	Quarry Road and Palo Road. The Stanford University site is approximately 2.5 miles southwest of the project site.	
San Francisquito Creek Bridge Replacement	US 101, East and West Bayshore Roads, border of Palo Alto and East Palo Alto, across San Francisquito Creek.	The California Department of Transportation proposes to demolish the San Francisquito Creek Bridge on Route 101, which includes portions of two frontage roads on each side of Route 101 (East and West Bayshore Roads), and replace it with a longer bridge, at the boundaries of the Cities of East Palo Alto and Palo Alto, and the Counties of San Mateo and Santa Clara.
Source: City of Palo Alto, Planning and Community Environment Department.		

Page 72: **REVISE *Section 4.3.4, Cumulative Traffic Impacts,*** as shown.

4.3.4.3 *Cumulative Construction Traffic*

During construction activities at the project site, trucks would enter the site via Embarcadero and West Bayshore Road, and exit the site on Channing Avenue or St. Francis Drive, turning left at the signalized intersection of Embarcadero Road. Construction on the San Francisquito Creek Bridge on West Bayshore north of the project site has been approved, and is projected to take one summer construction season (the date of which is to be determined). This construction would require closure of West Bayshore Road, and detour signs would be posted for alternate routes. This closure would not affect construction traffic, as construction trucks for Edgewood Plaza could be rerouted away from the bridge replacement.

Page 85: **REVISE *Section 7.4, Reduced Residential Density Alternative,*** as shown.

A "Reduced Residential Density" Alternative would include housing units on the site, but at a reduced number from what is currently proposed. As discussed previously, Carey & Company is of the opinion that the inclusion of housing at the north side of the site fundamentally changes the site's internal character and historic relationship to the community beyond. Carey & Company believes that if the original edge of the shopping center and relationship of the site's components to the neighborhood were maintained to a visible degree, some new construction could fit on the site. This construction could include a multi-story structure on a much smaller footprint than the proposed housing, or a reduced number of single-family houses (i.e., two or three near to West Bayshore Road). The proposed park or other amenities on site could also be increased, or the parking for the retail uses could be increased. The number of units has not been precisely defined to date, but it would be few enough that the impacts to the historic character of Edgewood Plaza, and impacts to the site's internal character and relationship to the community beyond, would be reduced to a less than significant level.

Page 86: **REVISE *Section 7.4.3, Relationship to Project Objectives,*** as shown.

The Reduced Residential Density Alternative would meet the project objective of providing single-family housing on the site, although at a substantially reduced density and number. The park could also be constructed, and could potentially be larger than currently proposed. Other project objectives, including the rehabilitation of the site for commercial uses, and reusing the existing buildings for retail uses could be achieved.

EIR APPENDICES

EIR Appendix D: **INSERT** EIR Appendix D: Summary of Applicable Palo Alto Comprehensive Plan Polices, as shown on the pages following this section.

6.2 REVISIONS TO THE TEXT OF THE INITIAL STUDY, APPENDIX C OF THE DRAFT EIR

Page 26: **REVISE *Section 3.1.1.1,*** as shown.

Land uses surrounding the project area are primarily single-family residential to the north, south, and west (refer to Figure 3). Multi-family uses in the City of East Palo Alto are located approximately one-quarter mile north of the project site on West Bayshore Road. The single-family residences near the project site are in the Duveneck/Saint Francis neighborhood of Palo Alto. The Duveneck/Saint Francis neighborhood is bounded by West Bayshore Road, Newell Road, Embarcadero Road, Greer Road, and the Oregon Expressway. Many of the houses in this neighborhood, also known as Green Gables, were also developed by Eichler Homes, as discussed further in *Section 3.2, Cultural Resources* of this Draft EIR (Photos 7 and 8).

Page 48: **REVISE *Section 4.5.2.2, Historic Resources***, as shown.

The integrity of setting would not be substantially affected by the relocation of the marquee sign from its current location to a new location nearby on the site. Page & Turnbull believes that the relocation of the marquee sign to a new location on the project site nearby does not constitute a significant adverse impact, since a strong relationship is maintained between the sign and Buildings 1 and 2.

Page 49: **REVISE *Section 4.5.2.2, Historic Resources***, as shown.

Impact CR-2: The Edgewood Plaza site is considered historically significant under federal, state, and City of Palo Alto criteria. Relocation of Building 1 ~~and the marquee sign~~ on the site would alter the overall site design and characteristics of Edgewood Plaza, and therefore this relocation would result in a significant impact to historic resources. **[Significant Impact]**

Page 68: **REVISE *Section 4.8.3.2, On-Site Hazardous Materials Concerns,*** following the first paragraph, as shown.

Further soil sampling was completed in November 2011 and January 2012 to depths of five feet below ground surface to characterize potential soil vapor intrusion conditions at the site. The samples were collected within the former Moon's cleaners and in several parking lot areas nearby (Appendix P, Figure 2). The samples were analyzed for volatile organic compounds (VOCs), including tetrachloroethene (PCE) and its breakdown products. Only one sample near the current Moon's cleaners (SVP-1) was found to have levels of PCE exceeding the applicable commercial/industrial ESLs and CHHSLs.

These results indicate a potential for indoor vapor intrusion impact within the former Moon's Cleaners and other vacant building tenant spaces in Building 1. PCE was either not detected or detected at levels below the applicable commercial/industrial ESL and CHHSLs in or near Building 2 and the grocery building, and therefore no potentially significant indoor vapor intrusion impact by PCE soil vapor would be expected at those buildings. Under the proposed project, however, Building 1 would be relocated to a new location immediately to the west during redevelopment of the project site, and the existing building location would then be used as a park of the retail parking lot. Since PCE concentrations in soil vapor samples from three probes that would be located within the proposed new building footprint did not exceed applicable ESLs or CHHSLs, no potentially significant indoor vapor intrusion impact by PCE soil vapor would be anticipated for the relocated Building 1 following site redevelopment.

Page 68: **REVISE *Section 4.8.3.2, On-Site Hazardous Materials Concerns, Mitigation Measures,*** as shown.

Mitigation Measures: To further reduce the potential for construction workers or others to encounter hazardous materials contamination, the following mitigation measures are included in the project.

MM HAZ-1.1: Considering the property will be redeveloped and that potentially regulated soils may be encountered during site preparation activities, a Soil Management Plan (SMP) shall be prepared to reduce or eliminate exposure risk to human health and the environment. The SMP shall be developed to establish management practices for handling contaminated soil or other materials if encountered during construction activities. The SMP shall be reviewed and approved by the City of Palo Alto prior to commencing construction activities.

MM HAZ-1.2: Each contractor working at the site shall prepare a health and safety plan (HSP) that addresses the safety and health hazards of each phase of site operations that includes the requirements and procedures for employee protection.

MM HAZ-1.3: At the time Building 1 is moved, soil and groundwater samples, and/or soil vapor samples, if appropriate, shall be obtained from under 2125 Saint Francis Drive (the former Moon Cleaners) to ensure that soil exceeding the applicable levels for tetrachloroethene (PCE) and its breakdown products is not present within five feet of the ground surface. PCE-affected soil shall be removed by properly trained and licensed personnel and contractors, in conformance with procedures in the soil management plan (**MM HAZ-1**) prior to paving the area. Contaminated soil will be handled by trained personnel using appropriate protective equipment and engineering controls, in accordance with local, state, and federal laws. An excavation base confirmation sample will be collected and analyzed to document sufficient soils removal. Documentation of removal of PCE-affected soil shall be provided to the City of Palo Alto and appropriate oversight agencies prior to installation of pavement in the parking lot area.

MM HAZ-1.3~~4~~4: Excavated soils will be characterized prior to off-site disposal or reuse on-site. Appropriate soil characterization, storage, transportation, and disposal procedures shall be followed. Contaminated soils shall be disposed of at a licensed facility in accordance with all appropriate local, state, and federal regulations~~.~~, in accordance with its characteristics.

MM HAZ-1.5: The applicant shall prepare a contingency plan prior to the beginning of the project construction that will address any previously unknown sumps, hydraulic hoists, or tanks that may be present in the area of work.

Page 92: **REVISE *Section 4.12.2.4***, as shown.

Grocery Store: The proposed remodeling of the grocery store would include a loading dock at the east side of the building, approximately 60-70 feet south of proposed two-story residence on Lot 10

(refer to Figure 4). Delivery trucks, which will likely include tractor trailer trucks, are expected to drive past the project site on northbound West Bayshore Road approximately up to Channing Avenue, and would then back into the truck loading area at the east end of the grocery building. ~~Trucks delivering to the grocery building would exit to the north on to West Bayshore Road.~~ Oversize trucks would exit the site by traveling north on West Bayshore Road, turning left on Channing Avenue and St. Francis Drive, and then turning left at the signalized intersection of Embarcadero Road towards U.S. 101. Smaller trucks could exit the site on southbound West Bayshore Road.

Page 119/120: **REVISE *Section 4.16.2.4,*** as shown.

These driveways are projected to operate well due to the relatively low traffic volume on all the surrounding streets. The parking lot design for the retail portion of the site allows efficient flow of traffic with no dead end aisles and with 90-degree parking stalls. The site plan shows a loading dock and some employee parking that would be accessed by one of the driveways on West Bayshore Road.

Oversize trucks would access the site from the U.S. 101 Embarcadero Road exit, turning on to northbound West Bayshore Road. Trucks would access the loading dock by backing in off of West Bayshore Road. Because of the low volume on West Bayshore Road, this would not be disruptive. Oversize t~~T~~rucks, estimated at one per day, would leave the site by traveling north on West Bayshore Road ~~to University Avenue, via Woodland Avenue~~, turning left on Channing Avenue and St. Francis Drive, and then turning left at the signalized intersection of Embarcadero Road. Smaller trucks could exit the site on southbound West Bayshore Road. Oversize trucks may also exit via West Bayshore to U.S. 101 north of the project site (an existing Palo Alto Truck Route), but would not travel on Embarcadero Road or Channing Avenue west of the project site. The final site design will be required to comply with the City's standards and codes with respect to the size of the loading zone.

Page 120: **REVISE *Section 4.16.2.4,*** as shown.

Construction Access

During construction activities, trucks would enter the site via Embarcadero and West Bayshore Road, and exit the site on Channing Avenue or St. Francis Drive, turning left at the signalized intersection of Embarcadero Road, as they would during normal operations. Construction on the San Francisquito Creek Bridge on West Bayshore north of the project site has been approved, and the bridge would be removed during one summer construction season (estimated to be in the summer of 2014). The overall duration of this project is estimated to be from 2014 to 2017. The bridge removal would require closure of West Bayshore Road, and detour signs would be posted for alternate routes. This closure would not affect construction traffic.

Page 120: **REVISE *Section 4.16.2.5,*** as shown.

Bicycle Facilities

In the vicinity of the project, bike lanes (Class II Bikeways) exist along certain segments on Channing Avenue, Saint Francis Drive, Newell Road, Louis Road, California Avenue, Colorado Avenue, West Bayshore Road, East Bayshore Road, and on Embarcadero Road east of East Bayshore Road. In addition, bicyclists and pedestrians are able to cross US 101 via a dedicated pedestrian/bike bridge at Oregon Expressway. North-south bicycle accommodation near the project site is provided via bicycle lanes on Louis Road, and east-west bicycle access is provided via bike lanes on Channing

Avenue. Although bike lanes are not provided, Saint Francis Drive provides a good connection to the Oregon Expressway bicycle bridge. Saint Francis Drive is a low volume street suitable for bicycle usage. West Bayshore Road from Embarcadero Road to the City border with East Palo Alto does not currently have bicycle lanes, and no future bicycle facilities are proposed for this segment, based on the City's 2012 *Final Draft Bicycle and Pedestrian Transportation Plan*, Although no bicycle facilities are provided on this connection to the project site, the overall access to the project site for bicycles is considered adequate, as bicycle access is provided from most approaches to the site.

~~At least eighteen~~ Four bicycle lockers and 13 short-term bicycle parking spaces would be provided by the proposed project~~.~~, consistent with the Municipal Code, which would be adequate to serve the project site.

Pedestrian Facilities

Sidewalks are found along both sides of Embarcadero Road west of US 101, both sides of Saint Francis Drive, both sides of Channing Avenue, and most residential roadways near the project site. Sidewalks are not proposed to be provided along West Bayshore Road. While providing sidewalks at this location would be desirable, if feasible, additional street tree removal, removal of retail parking spaces, drive aisles, or residential units would be required.

The project would provide adequate pedestrian, bicycle, and transit facilities ~~would be adequate~~ to serve the proposed uses at the site, based on conformance with the City's Municipal Code and adopted plans.

Page 120: **INSERT** *Figure 16, Conceptual Site Circulation,* to *Section 4.16, Transportation,* as shown below.

Page 121: **REVISE** *Table 4.16-8, as follows:*

Table 14.~~6~~16-8
Parking Summary

Land Use	Parking Requirement (per P.A. Zoning Code)	Spaces Required	Parking Proposed	Conforms to Ordinance?
Residential	2 spaces/unit (20)	20	20	Yes
Residential Guest	33% of all units	4 (3.3)	6	Yes
Commercial	1 per 275 square feet	142	15~~7~~6	Yes
Adjacent Office (Easement) [1]	16 spaces	(16)		
	Site Total:	**(166) 182**	**18~~3~~2**[2]	**Yes**

Notes: [1]Adjacent office parking per agreement with the uses at 1101 Embarcadero Road (Maharishi Enlightenment Center).
[2] Two additional tandem stalls would be available in the commercial area for employee parking, for a total of 185 parking spaces provided.

Page 134: **REVISE** *Section 5.0, References,* as shown.

AllWest Environmental Inc. *Soil Vapor Investigation Report, Edgewood Plaza, 2050 Channing Avenue and 2103-2129 Saint Francis Drive, Palo Alto, California.* January 19, 2012.

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Federal Highway Administration, *Highway Safety Improvement Program 5 Percent Report*. 2007. http://safety.fhwa.dot.gov/hsip/fivepercent/2007/index.cfm?state=ca.

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Page 135: **REVISE** *Section 5.0, References*, as shown.

Palo Alto, City of. *Final Draft, City of Palo Alto. Bicycle and Pedestrian Transportation Plan.* January 2012. Available at: http://www.cityofpaloalto.org/civica/filebank/blobdload.asp?BlobID=30083.

Palo Alto, City of, Safe Routes to School/Traffic Calming Program. Available at: http://www.cityofpaloalto.org/depts/pln/transportation/safe_routes_to_school_neighborhood_traffic_calming/default.asp. Accessed January 15, 2012.

Palo Alto, City of. Truck Route Map. http://www.cityofpaloalto.org/civica/filebank/blobdload.asp?BlobID=6922/

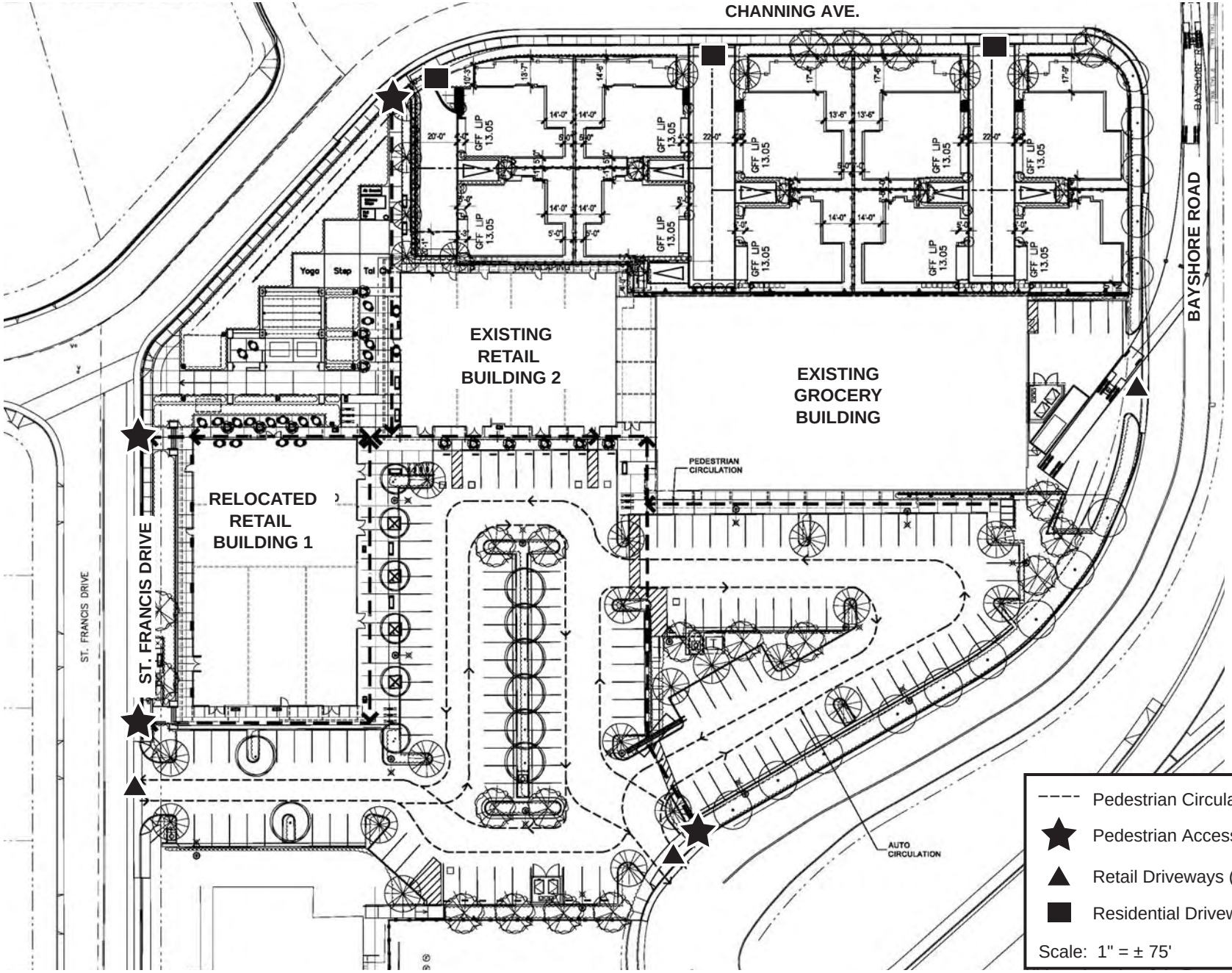
Page 137: **REVISE** *Section 5.0, References*, as shown.

Persons and Organizations Contacted

Dave Doktor, City of Palo Alto, Department of Planning and Community Environment
Cathy Mak, Chief Business Official, Palo Alto Unified School District.
Rafael Ruiz~~z~~s, City of Palo Alto, Department of Planning and Community Environment
Rosemary Morse, City of Palo Alto, Department of Public Works.
John Tze, Sand Hill Properties.
Ron Moriguchi, California Department of Transportation
Mark Cunningham, AllWest Environmental

INITIAL STUDY APPENDICES

IS Appendix P: **INSERT** IS Appendix P: Soil Vapor Investigation Report, January 19, 2012, as shown on the following pages.



CONCEPTUAL SITE CIRCULATION PLAN

FIGURE 16

EIR Appendix D

Summary of Applicable Palo Alto Comprehensive Plan Policies in the Land Use and Community Design Element

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Edgewood Plaza Project
Final Environmental Impact Report

City of Palo Alto

APPENDIX D: SUMMARY OF COMPREHENSIVE PLAN LAND USE AND COMMUNITY DESIGN ELEMENT POLICIES

Element/Policies	*Discussion*
Land Use and Community Design Element	
Policy L-4: Maintain Palo Alto's varied residential neighborhoods while sustaining the viability of its commercial areas and public facilities. Use the Zoning Ordinance as a tool to enhance Palo Alto's desirable qualities.	The project proposes to rezone the site to allow an increase in residential development on the site and a small park. The project would also remodel the existing retail center. One of the objectives of the rezoning is to restore the commercial uses to viability, which would be consistent with the commercial viability portion of this policy.
Policy L-5: Maintain the scale and character of the City. Avoid land uses that are overwhelming and unacceptable due to their size and scale.	The proposed project would maintain the three existing retail buildings and add ten new residential units. These residential units would be two-story detached houses on smaller lots than existing residences in the Edgewood Tract, which would be a modification of the visual character in the immediate area. The proposed residences would be separated from existing single-story houses by a two-lane road (Channing Avenue), which would provide a transition between the retail and the existing low-density residential uses in the neighborhood. Given the separation, and the proposed building heights, the vertical scale of the new residential buildings is not anticipated to substantially overwhelm the existing neighborhood. The final design of the new buildings will be reviewed by the City's Architectural Review Board for conformance with the City's design standards.
Policy L-11: Promote increased compatibility, interdependence, and support between commercial and mixed use centers and the surrounding residential neighborhoods.	The project would remodel an existing commercial center to serve the adjacent neighborhood. This remodeling would include improved sidewalks and pedestrian areas, and a small park that would provide access and connections between Edgewood Plaza and surrounding neighborhoods. Refer to *Section 3.1.4.3*, above, for a discussion of compatibility of the proposed mixed uses with existing residential uses.
Policy L-12: Preserve the character of residential neighborhoods by encouraging new or remodeled structures to be compatible with the neighborhood and adjacent structures.	The project proposes to remodel the existing commercial buildings in a manner consistent with their original style, and in keeping with the surrounding Eichler-designed residential neighborhood. Ten single-family residences would also be constructed on the site. Compatibility of the design of proposed residences with the existing neighborhood will be reviewed by the Architectural Review Board.

Element/Policies	*Discussion*
Land Use and Community Design Element	
Policy L-15: Preserve and enhance the public gathering spaces within walking distance of residential neighborhoods. Ensure that each residential neighborhood has such spaces.	The project proposes to install and maintain a small park accessible to the general public at the corner of the site near the residential neighborhood.
***Goal L-4*:** Inviting, pedestrian-scale centers that offer a variety of retail and commercial services and provide focal points and community gathering places for the City's residential neighborhoods and employment districts.	The proposed project would revitalize a long-time retail center in the Duveneck/Saint Francis neighborhood. It also would install and maintain a new, small park accessible to the community. For these reasons, the project appears consistent with this goal.
Policy L-18: Encourage the upgrading and revitalization of selected Centers in a manner that is compatible with the character of surrounding neighborhoods.	The proposed project would renovate a retail center for the Duveneck/Saint Francis neighborhood. The grocery and retail buildings would be remodeled to reflect the original architecture of the site and the Edgewood Tract, and therefore, the project appears consistent with this policy.
Policy L-19: Encourage a mix of land uses in all Centers, including housing and an appropriate mix of small-scale local businesses.	The proposed mixed use project would renovate the existing grocery store building and two retail buildings on the Edgewood Plaza site, and would construct ten new residential units.
Policy L-20: Encourage street frontages that contribute to retail vitality in all Centers. Reinforce street corners with buildings that come up to the sidewalk or that form corner plazas.	The proposed project would maintain the existing retail buildings, and relocate one closer to the sidewalk on Saint Francis Drive. The project also proposes a residential streetscape close to the sidewalk with the new proposed single-family homes on Channing Avenue.
Policy L-21: Provide all Centers with centrally located gathering spaces that create a sense of identity and encourage economic revitalization. Encourage public amenities such as benches, street trees, kiosks, restrooms and public art.	The proposed project would include a new park and street trees that would also serve as gateway elements between the center and the neighborhood.
Policy L-37: Maintain the scale and local-serving focus of Palo Alto's four Neighborhood Centers. Support their continued improvement and vitality.	The project proposes to rehabilitate and remodel the existing local-serving Edgewood Plaza, and would improve it through new landscaping and a small park.
Policy L-39: Facilitate opportunities to improve pedestrian-oriented commercial activity within Neighborhood Centers.	The project would replace and repair sidewalks and pathways, and would construct a small park near the retail uses. These improvements would facilitate pedestrian use of Edgewood Plaza, consistent with this policy.
Policy L-48: Promote high quality, creative design and site planning that is compatible with surrounding development and public spaces.	The proposed project would make use of the existing site and existing buildings. The quality and compatibility of the design of the rehabilitation of the existing buildings and the design of the proposed residences will be reviewed by the Architectural Review Board.

Element/Policies	*Discussion*
Historic Resources	
Goal L-7: Conservation and preservation of Palo Alto's historic buildings, sites, and districts. **Policy L-51:** Encourage public and private upkeep and preservation of resources that have historic merit, including residences listed in the Historic Inventory.	The proposed project does not propose to demolish the existing Edgewood Plaza shopping center, but rather would remodel and renovate the retail buildings and marquee sign. Based on the opinion of Carey & Company, relocation of Building 1 would adversely impact the integrity of the historic resources on the site. However, the project appears consistent with this goal and policy, as the project proposes to renovate and provide upkeep of this commercial center, to help ensure its long-term viability.
Policy L-55: Relocation may be considered as a preservation strategy when consistent with State and National Standards regarding the relocation of historic resources.	The proposed project would relocate a historic building and marquee sign on site. This relocation is not proposed as a way to preserve historic buildings that may be in the way of another construction project, but is rather proposed as a way to redevelop the site to increase its usefulness for future tenants. Based on the opinion of the City's historic consultant, this relocation would not be consistent with State and National Standards, and therefore the project may not be consistent with this policy. The decision-makers, the Palo Alto City Council, ultimately will determine the overall consistency of the project with the City's Comprehensive Plan.
Policy L-58: Promote adaptive reuse of old buildings.	The project proposes to relocate one retail building and rehabilitate and reuse all three buildings on the site. To the extent the project would adaptively reuse the buildings and maintain their general form, it would be consistent with this policy.

Insertion to IS Appendix J

Phase I Environmental Site Assessment
West Parcel: 2103-2125 St. Francis Drive

Edgewood Plaza Project
Final Environmental Impact Report

City of Palo Alto

LEGEND

- SUBJECT PROPERTY
- FORMER/CURRENT CLEANERS
- 1 QUIK/FRANK'S/ MOON'S CLEANERS (2125 ST. FRANCIS - 1965-PRESENT)
- 2 EDGEWOOD PLAZA CLEANERS (2050 CHANNING - 1973-1991)
- 3 EDGEWOOD PLAZA CLEANERS (2109 ST. FRANCIS - 1965-1969)

B-7 BORING LOCATIONS

Figure 2: Boring Locations

Scale: 1:900
Date: 2/27/2004
Photo ID No. USGS (via terraserver.microsoft.com)

N↑

AllWest Environmental, Inc.
530 Howard Street, Suite 300
San Francisco, California 94105
Phone: 415/391-2510
Fax: 415/391-2008

Site Name: Edgewood Shopping Center
2103-2129 St. Francis Drive, 2050 and 2080 Channing Avenue
Palo Alto, California

Project Number: 25301.23

Revised IS Appendix J - Figure 2

Initial Study Appendix P

Soil Vapor Investigation Report
January 19, 2012

Edgewood Plaza Project
Final Environmental Impact Report

City of Palo Alto

AllWest Environmental, Inc.

Specialists in Physical Due Diligence and Remedial Services

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SOIL VAPOR INVESTIGATION REPORT

Edgewood Plaza
2050 Channing Avenue and 2103–2129 Saint Francis Drive
Palo Alto, California

PREPARED FOR:

Ho Holdings No. 1 LLC
c/o Sand Hill Property Company
203 Redwood Shores Parkway, Suite 200
Redwood City, CA 94065

ALLWEST PROJECT 11181.23
January 19, 2012

PREPARED BY:

Leonard P. Niles

Leonard P. Niles, PG, CHG
Senior Project Manager

REVIEWED BY:

Marc D. Cunningham REA
President

AllWest

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Specialists in Physical Due Diligence and Remedial Services

530 Howard Street, Suite 300
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SOIL VAPOR INVESTIGATION REPORT

Edgewood Plaza
2050 Channing Avenue and 2103–2129 Saint Francis Drive
Palo Alto, California

I. EXECUTIVE SUMMARY

AllWest Environmental, Inc. (AllWest) conducted a subsurface investigation on November 17, 2011 and January 3, 2012 to characterize potential soil vapor intrusion conditions in the vicinity of three current and former dry cleaning facilities at the subject site referenced above (Figures 1 and 2). The purpose of the investigation was to evaluate the potential for impact by soil vapor intrusion of the dry cleaning solvent tetracholorethene (PCE) and other volatile organic compounds (VOCs) detected in groundwater samples during previous subsurface investigations at the subject site.

This executive summary is provided solely for the purpose of overview. Any party who relies on this report must read the full report. The executive summary may omit details, any one of which could be crucial to the proper understanding and risk assessment of the subject matter.

Seven soil borings were advanced on November 17, 2011 using Geoprobe® Direct Push Technology (DPT) methods. Temporary soil vapor probes SVP-1 through SVP-7 were installed to a depth of 5 feet below ground surface (bgs). Eight soil borings were advanced on January 3, 2012 using Geoprobe® DPT methods. Temporary soil vapor probes SVP-8 through SVP-15 were installed to a depth of 5 feet bgs. The soil vapor probes were located in tenant spaces and outdoor parking areas in the vicinity of the current Moon's Cleaners dry cleaner at 2125 St. Francis Drive, the former Edgewood Plaza Cleaners location at 2050 Channing Avenue, the former Edgewood Plaza Cleaners location at 2109 St. Francis Drive, and adjacent to the former supermarket building at 2080 Channing Avenue (Figure 2). AllWest collected soil vapor samples from SVP-1 through and SVP-15 in SUMMA canisters in general accordance with the State of California Department of Toxic Substances Control (DTSC) *Interim Final, Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air - DTSC December 15, 2004 (Revised February 7, 2005).*

PCE was detected in soil vapor samples collected from temporary probe SVP-1, located in the outdoor parking area adjacent to the east side of Moon's Cleaners, at a concentration of 17,000 micrograms per cubic meter (µg/m^3); from probes SVP-9 and SVP-10, located in the parking area west to west-northwest of Moon's Cleaners, at concentrations of 41 µg/$m^3$and 88 µg/m^3; and from probes SVP-14 and SVP-15, located in the parking area northeast of Moon's Cleaners, at concentrations of 230 µg/$m^3$and 78 µg/m^3.

The PCE breakdown product trichloroethene (TCE) was detected in the soil vapor sample collected from SVP-1 at a concentration of 520 µg/m^3. Low concentrations of other VOCs were detected in all soil vapor samples collected with the exception of SVP-6; however, none of them were PCE breakdown constituents, and in the opinion of AllWest most of them appear to be laboratory contaminants and therefore are not chemicals of concern (COCs) for this investigation (Table 1). The petroleum hydrocarbon constituents benzene, toluene, ethylbenzene and xylenes (BTEX) may be potential COCs, but are unlikely to have originated from the subject property.

The PCE soil vapor sample concentration in probe SVP-1 exceeded the corresponding California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) Environmental Screening Level (ESL) of 1,400 µg/m^3 for commercial/industrial land use (RWQCB, *Screening for Environmental Concerns at Sites with Contaminated Soil and Groundwater*, *Table E*, Interim Final November 2007, revised May 2008), and exceeded the State of California Environmental Protection Agency (CalEPA) California Human Health Screening Level (CHHSL) of 600 µg/m^3 for soil vapor at commercial/industrial sites constructed without engineered fill (*Use of California Human Health Screening Levels (CHHSLs) in Evaluation of Contaminated Properties, Table 3*, January 2005, revised September 23, 2010).

The PCE soil vapor sample concentration of 230 µg/m^3 in probe SVP-14 exceeded the CHHSL for residential land use of 180 µg/m^3, but not the commercial land use CHHSL. None of the other VOCs detected in soil vapor samples, including TCE, exceeded their applicable ESLs or CHHSLs for residential or commercial/industrial land use, and therefore are unlikely to present a potential indoor vapor intrusion impact.

AllWest concludes the detection of PCE in the soil vapor sample SVP-1 at levels exceeding the applicable commercial land use ESL and CHHSL indicates a potential for indoor vapor intrusion impact within the adjacent Moon's Cleaners and other building tenant spaces at 2121, 2525 and 2129 St. Francis Drive. Since PCE was not detected in soil vapor samples SVP-2 through SVP-5 collected within tenant spaces in the building at 2050 Channing and 2103 through 2109 St. Francis Drive, AllWest concludes that no indoor vapor intrusion impact by PCE soil vapor exists in that building. Since the PCE detected in soil vapor sample SVP-15 located adjacent to the building at 2080 Channing Avenue was below the applicable commercial/industrial ESL and CHHSL, AllWest concludes that no potentially significant indoor vapor intrusion impact by PCE soil vapor exists at that building.

The subject site building at 2121 through 2129 St. Francis Drive is scheduled to be moved to a new location to the west during redevelopment in the near future. The former location will be used as a parking lot. Since PCE concentrations in soil vapor samples from probes SVP-8, SVP-9 and SVP-10 located within the proposed new building location did not exceed applicable ESLs or CHHSLs, AllWest concludes that no potentially significant indoor vapor intrusion impact by PCE soil vapor will exist following site redevelopment.

Due to the potential presence of PCE-impacted soils beneath the subject site building at 2121 through 2129 St. Francis Drive, AllWest recommends preparation of a Soil Management Plan prior to its move to the site's western margin, site grading and redevelopment.

II. PROJECT BACKGROUND

A. Site Location and Description

The subject site is located in a small shopping center, Edgewood Plaza, in a mixed commercial and residential area of the City of Palo Alto (Figure 1). The subject property is located on the southeast corner of Channing Avenue and east side of St. Francis Drive, and northwest of Embarcadero and West Bayshore Roads. A Shell service station is located adjacent to the south boundary of the subject property. A site vicinity map is presented as Figure 1.

The subject property consists of an irregular-shaped parcel of land approximately 1.9 acres in size, comprising the western portion of the Edgewood Plaza shopping center. The subject site is developed with two single-story commercial buildings containing 17,500 net rentable square feet. The subject site buildings are of wood-frame and concrete masonry unit, slab-on-grade construction with flat composition roofing. The two buildings are sub-divided into approximately nine commercial tenant spaces, all of which are currently vacant. The remainder of the subject site is comprised of asphalt-paved parking lots and limited areas of professionally-maintained landscaping. An adjacent large commercial building and surrounding parking areas occupying the eastern portion of the Edgewood Plaza shopping center are not part of the subject property. A site plan is included as Figure 2.

B. Site Geology and Hydrogeology

The subject property is located at approximately 10 feet above feet above mean sea level (MSL) on a gently sloping plain that dips northeast to the San Francisco Bay. The site is located in the Coast Ranges of California within the western portion of a major northwest-trending structural depression that forms the San

Francisco Bay basin, and bounded by the San Andreas Fault on the west and Hayward Fault on the east.

The subject property is located in the northwest corner of the Santa Clara Valley Groundwater Basin. The Santa Clara Valley Groundwater Basin is located at the southern end of San Francisco Bay and lies within an alluvial-filled intermontane valley defined by the Coast Range on the west and the Diablo Range on the east. The basin fills the southern end of the structural trough filled by San Francisco Bay. At its northern end, the basin is 15 miles wide. On its western edge, it continues north as the San Mateo Plain and Baylands, and on its eastern edge, it continues north as the Baylands and Alameda Plain to Niles Cone.

The boundary of the Santa Clara Valley Groundwater Basin is generally considered to be the contact of alluvial valley fill with consolidated bedrock formations at the surface and beneath the alluvium. Gently sloping alluvial fans emerging from the basin's tributaries have laterally merged to form an alluvial apron, descending to the basin interior. The upper fan areas along the elevated edges of the basin are predominantly made up of coarse deposits, represented by massive sections of highly permeable gravel and less permeable gravel and clay. Mid-fan deposits are characterized by finer-grained, but better sorted, deposits, and include moderately stratified clean and highly permeable sands and gravels, with fine-grained and restrictively permeable to impermeable silt and clay beds more abundant farther down the fan (CRWQCB, *A Comprehensive Groundwater Protection Evaluation for the South San Francisco Bay Basins*, May 2003).

Soil data collected during previous AllWest subsurface investigations indicate a generally uniform soil profile across the subject property. Below the asphalt and concrete pavement, 4 to 6 inches of gravel sub-base were encountered. Below the sub-base, silty to sandy clay was encountered to approximate depths of 2 to 5 feet bgs, From approximately 2 to 6 feet bgs, a layer of sand and clayey sand was encountered, underlain by silty clay to the total explored depth of 12 to 20 feet bgs. Groundwater was encountered in the borings at depths of approximately 8 to 18 feet bgs (AllWest, January 2006).

Depth to static groundwater, as obtained from monitoring well data at the adjacent Shell service station site, is approximately 4.2 to 8.7 feet below ground surface (bgs) with a calculated flow direction of east-southeast at a gradient of approximately 0.019 feet per foot (Santa Clara County Department of Environmental Health, *Fuel Leak Site Case Closure, Shell, 1161 Embarcadero Road, Palo Alto, CA*, December 21, 2004).

C. Site Background and Previous Investigations

A review of historical documents indicated the subject property was developed by 1950 with several large buildings resembling greenhouses and several smaller structures resembling houses and outbuildings. By 1955, the greenhouses and

most of the smaller structures were razed. One small structure was present near the center of the property. The shopping center was constructed circa 1957 based on the review of planning permits.

Based on AllWest's review of historical city directories, dry cleaners have been present on the property from at least 1965 to late 2011. From approximately 1973 to 1991, Edgewood Plaza Cleaners and Sewing Center was the tenant of 2050 Channing Avenue. The sewing center was the tenant in 1995; the tenant suite was most recently occupied by The House of Wigs until late 2011. Circa 1965 through 1969, Edgewood Plaza Cleaners was located at 2109 Saint Francis Drive. Circa 1965 to late 2011, a cleaners under a variety of names has been a tenant at 2125 Saint Francis Drive. The most recent tenant, Moon's Cleaners, was a drop off location and has not performed on site dry cleaning activities since 1998. All of the remaining subject site tenants vacated the subject site between November 2011 and January 2012.

AllWest conducted a Phase I Environmental Site Assessment (ESA) at the subject property in 2005 and a Phase I ESA update in 2010 (AllWest, December 19, 2005 and July 21, 2010). AllWest conducted subsurface investigations at the subject and adjacent properties in 2005, 2006 and 2010 (AllWest, January 13, 2006, February 8, 2006 and July 22, 2010). Very low concentrations of PCE were detected in groundwater samples collected downgradient from Moon's Cleaners. Low concentrations of other VOCs apparently not originating at the subject site were detected in several groundwater samples.

III. PURPOSE AND SCOPE OF WORK

The purpose of this investigation was to evaluate the potential for impact by soil vapor intrusion of VOCs to the indoor air quality at the subject site by collecting shallow soil vapor samples inside and adjacent to the three former dry cleaner locations. The scope of work, as proposed, consisted of the following tasks:

1) Prepared a site-specific health and safety plan;

2) Engaged the service of Underground Service Alert (USA) and a private underground utility locator to locate and clear underground utilities within the proposed investigation areas so that the potential of accidental damage to underground utilities was reduced during the subsurface investigation. Notified Edgewood Plaza Shopping Center tenants and facility maintenance prior to the start of field work;

3) Retained the services of a C-57 licensed drilling contractor (Vironex, Inc.) for the advancement by Geoprobe® direct push technology (DPT) methods, using a limited access rig, of seven soil borings to 5 feet bgs, and installed seven temporary soil vapor probes, SVP-1 through SVP-15. Collected soil vapor samples using SUMMA canisters in general accordance with *Interim Final, Guidance for the Evaluation and*

Mitigation of Subsurface Vapor Intrusion to Indoor Air - DTSC December 15, 2004 (Revised February 7, 2005). Retained one soil vapor sample from each vapor probe for laboratory analysis;

4) At the completion of drilling and sampling activities, removed Geoprobe® drive casings and temporary soil vapor probes, backfilled each boring with a "neat" cement grout slurry, and restored the interior floor slabs by backfilling with a concrete slurry;

5) Maintained soil vapor samples under chain-of-custody and transport the samples to a Department of Health Services (DHS) certified analytical laboratory (McCampbell Analytical of Pittsburg, California) for chemical analyses. Analyzed soil vapor samples for VOCs using EPA Method TO-15 (mid detection level, full scan) and helium by ASTM D1946; and

6) Prepared this report describing the field activities, summarizing the laboratory data, presenting investigation findings, and providing conclusions and recommendations.

IV. INVESTIGATIVE ACTIVITIES

A. Permitting

Drilling permits are not required by the Santa Clara Valley Water District (SCVWD) for soil borings that do not exceed a depth of 40 feet bgs and do not encounter groundwater.

B. Health and Safety Plan

AllWest prepared a site specific health and safety plan prior to mobilizing to the site. A tailgate safety meeting was conducted prior to commencing work. All site personnel were instructed to review the health and safety plan.

C. Underground Utility Inspection

To avoid damage to underground utility installations during the course of the subsurface investigation, AllWest contacted Underground Service Alert (USA), an organization for public utility information, on the pending subsurface investigations. USA then notified public and private entities that maintained underground utilities within the site vicinity to locate and mark their installations for field identification.

A private underground utility locator, Subtronic Corporation (Subtronic) of Concord, California, was also retained by AllWest to conduct two magnetometer sweep and ground penetrating radar investigations to locate marked and unmarked underground utilities in the vicinity of the proposed boring locations.

D. Geoprobe® DPT Boring Advancement

On November 17, 2011, a State of California C-57 licensed drilling contractor, Vironex, Inc., of Concord, California, advanced seven borings, SVP-1 through SVP-7, at four locations inside the subject site buildings and three outside locations in the driveways and parking areas. On January 3, 2012, an additional eight borings, SVP-8 through SVP-15, were advanced by Vironex, Inc. at locations in the parking areas and driveways to the west, south and east of the subject site building at 2121 through 2129 St. Francis Drive containing the former Moon's Cleaners.

Boring SVP-1 was located in the driveway adjacent to Moon's Cleaners at 2125 St. Francis Drive. Boring SVP-2 was located inside a vacant space formerly occupied by St. Francis-Edgewood Plaza Cleaners at 2109 St. Francis Drive. Boring SVP-3 was located inside the space then occupied by California Golf at 2103 St. Francis Drive, adjacent to the two former St. Francis-Edgewood Plaza Cleaners locations. Borings SVP-4 and SVP-5 were located inside the space then occupied by House of Wigs and formerly occupied by St. Francis-Edgewood Plaza Cleaners at 2050 Channing Avenue. Boring SVP-6 was located in the driveway adjacent to House of Wigs at 2050 Channing Avenue. Boring SVP-7 was located in the parking area near the northern subject site boundary adjacent to Channing Avenue.

Borings SVP-8, SVP-9 and SVP-10 were located in the parking area west of the subject site building at 2121 through 2129 St. Francis Drive containing the former Moon's Cleaners. Borings SVP-11 and SVP-12 were located in the driveway south of the subject site building at 2129 St. Francis Drive, adjacent to the Shell service station at 1161 Embarcadero Road. Borings SVP-13, SVP-14 and SVP-15 were located in the parking area east of the subject site building at 2121 through 2129 St. Francis Drive containing the former Moon's Cleaners, with SVP-15 being located adjacent to the vacant supermarket building at 2080 Channing Avenue. Boring locations are shown in Figure 2.

After coring through the 6-inch thick concrete floor slabs locations inside the buildings, and through 3-inch thick asphalt pavement at outside locations in the parking areas, the borings SVP-1 through SVP-7 were advanced to approximately 5 feet bgs with hand-operated limited access equipment using slide hammer-driven 1-inch outside diameter (OD) rods and probes with expendable tips. Borings SVP-8 through SVP-15 were advanced using a truck-mounted Geoprobe® DPT rig driving 1-inch OD rods and probes with expendable tips. No soil cores were recovered from the probes. After the probes were advanced to the specified depth, the probes and drive rods were removed, leaving the borehole open with the expendable probe tip at the bottom. Standard Geoprobe® operating procedures are included in Appendix A.

E. Temporary Soil Vapor Probe Installation

Fifteen shallow temporary soil vapor probes (SVP-1 through SVP-15) were installed to 5 feet bgs within the open boreholes inside the former dry cleaner buildings or in adjacent driveways or parking areas. Soil vapor probe locations are shown in Figure 2.

Stainless steel vapor probes, ½-inch diameter by 2-inches long and tipped with porous plastic membranes, were inserted to the bottom of the 1-inch diameter boreholes at 5 feet bgs. The probe tips were attached to 7-foot lengths of 0.25-inch OD Teflon™ tubing extending to the top of the floor slab. A fine sand filter pack was placed in the borehole annulus around the probe. Hydrated bentonite chips were then used to fill the annular space above the filter pack to the top of the floor slab. The bentonite was allowed to hydrate and borehole conditions to equalize for 30 minutes prior to sampling activities, per DTSC vapor sampling guidelines. Standard soil vapor probe installation procedures are included in Appendix A.

F. Soil Vapor Sampling

AllWest collected soil vapor samples from the seven temporary soil vapor probes SVP-1 through SVP-7 on November 17, 2011, and the eight temporary soil vapor probes SVP-8 through SVP-15 on January 3, 2012, following a minimum 30-minute period after hydration of the bentonite surface seals. Soil vapor sampling was performed in general accordance with the State of California Department of Toxic Substances Control (DTSC) *Interim Final, Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air - DTSC December 15, 2004 (Revised February 7, 2005).* Standard soil vapor sampling procedures are included in Appendix A.

AllWest collected one soil vapor sample from each probe in laboratory prepared 1-liter (L) capacity SUMMA canisters. Prior to vapor purging and sample collection, a vacuum leak test of the flow-controller/gauge manifold assembly was performed for a minimum of 1 to 2 minutes and a maximum of 7 minutes. The manifold assembly used for SVP-3 failed the vacuum leak test and was replaced. All other sample manifolds passed the vacuum leak test. Prior to sample collection, approximately 200 to 500 milliliters (ml) of soil vapor (a minimum of 3 sample system volumes) was purged at a nominal flow rate of approximately 150 milliliters per minute (ml/min) from each sub-slab vapor probe using a dedicated 6-liter capacity SUMMA purge canister.

While sampling, a leak detection test was conducted using helium as a leak tracer inside an airtight plastic shroud. The helium concentration inside the leak detection shroud was monitored using a helium gas detector. Average helium concentrations within the shroud ranged from 18.3% to 25.6%. No ambient air samples were collected to verify measured helium concentrations inside the leak

detection shrouds; the planned ambient leak detection gas SUMMA canister for the November 17, 2011 event was instead used to collect the vapor sample from probe SVP-7, and no extra ambient leak detection gas SUMMA canister was supplied by the analytical laboratory for the January 3, 2012 event. The leak detection shroud was removed from probe SVP-5 prior to sampling to undo a kink obstructing the sample tubing, therefore no helium concentration was measured.

A nominal flow rate of approximately 150 ml/min was used to fill the sample canisters; actual measured flow rates ranged from approximately 137 ml/min to 225 ml/min. The canisters were filled to approximate 80% of capacity (approximately -5 inches of mercury vacuum remaining). All pertinent field observations, pressure, times and readings were recorded. After filling and closing the sample valve, all SUMMA canisters were removed from the manifold, labeled with sampling information, including initial and final vacuum pressures, placed in a dark container and transported under chain-of-custody to the analytical laboratory, McCampbell Analytical, Inc., of Pittsburg, California. Soil vapor sampling and SUMMA field logs are included in Appendix B.

G. Borehole Backfilling

At the completion of drilling and sampling activities and removal of all drive rods and temporary sample probes, the borings were backfilled with a “neat” Portland Type I or II cement grout slurry tremied into the borehole through a PVC pipe. The level of grout was checked to ascertain if any settling had occurred and was “topped off” if required. The cored holes through the asphalt pavement and interior concrete slabs were backfilled flush to grade with concrete slurry.

H. Sample Preservation, Storage and Handling

To prevent the loss of constituents of interest, all soil vapor sample SUMMA canisters were placed in a dark container for shipment to the analytical laboratory.

I. Chain-Of-Custody Program

All samples collected for this project were transported under chain-of-custody protocol. The chain-of-custody program allows for the tracing of possession and handling of individual samples from the time of field collection through laboratory analysis. The document included the signature of the collector, date and time of collection, sample number, number and type of sample containers including preservatives, parameters requested for analysis, signatures of persons and inclusive dates involved in the chain of possession. Upon delivery to the laboratory the document also included the name of the person receiving the samples, and date and time samples were received. Chain-of-custody documents are included in Appendix C.

V. ASSESSMENT FINDINGS

A. Subsurface Conditions

No soil cores were recovered during boring advancement, therefore no lithologic characteristics were noted. The relatively high flow rates (137 ml/min to 225 ml/min) noted during purging and sampling indicated the soils were of at least moderate permeability. In subsurface investigations conducted at the subject site by AllWest, silty to sandy clay was encountered below the pavement and sub-base to approximate depths of 2 to 5 feet bgs, underlain by a layer of sand and clayey sand from approximately 2 to 6 feet bgs. No groundwater was encountered during this investigation.

B. Laboratory Analysis and Sampling Data

All soil vapor samples selected for analysis were analyzed by a State of California certified independent analytical laboratory. McCampbell Analytical, Inc., of Pittsburg, California. Sample analysis was performed on 5-day turnaround time.

The soil vapor samples collected during this investigation were analyzed for VOCs using EPA Method TO-15 (mid-detection levels, full scan), and, except for the sample from SVP-5, the leak detection gas helium per ASTM D-1946. The sample from SVP-5 was not analyzed for helium, since the leak detection shroud had to be removed during sampling to undo a kink in the sample tubing.

PCE was detected in soil vapor samples collected from probes SVP-1, SVP-9, SVP-10, SVP-14 and SVP-15 at respective concentrations of 17,000 µg/m^3, 41 µg/m^3, 88 µg/m^3, 230 µg/m^3 and 78 µg/m^3. The PCE breakdown product TCE was detected only in sample SVP-1 at a concentration of 520 µg/m^3.

Several other VOCs were detected in all soil vapor samples collected except SVP-6, at maximum concentrations of 370 µg/m^3 acetone, 7.0 µg/m^3 benzene, 110 µg/m^3 chloroform, 6,400 µg/m^3 ethanol, 410 µg/m^3 ethyl acetate, 47 µg/m^3 ethylbenzene, 30 µg/m^3 4-ethyltoluene, 110 µg/m^3 isopropyl alcohol, 7.0 µg/m^3 tetrahydrofuran, 74 µg/m^3 toluene, 18 µg/m^3 1,1,1-trichloroethane (1,1,1-TCA), 110 µg/m^3 1,2,4-trimethylbenzene, 37 µg/m^3 1,3,5-trimethylbenzene, and 310 µg/m^3 total xylenes; however none of them were PCE breakdown constituents and most are not considered by AllWest to be potential chemicals of concern (COCs) for this investigation.

The leak detection gas helium was detected in all soil vapor samples except SVP-5 and SVP-9 at concentrations ranging from 0.0036% in SVP-14 to 6.4% in SVP-2, indicating that dilution with atmospheric air from system vacuum leaks was insignificant. The sample from SVP-5 was not analyzed for helium. Soil vapor analytical data is summarized in Table 1, and PCE concentrations are shown on Figure 2. Soil vapor analytical reports are included in Appendix C.

C. Laboratory Quality Assurance and Quality Control

A review of laboratory internal quality assurance/quality control (QA/QC) reports indicates the method blank and sample spike data for all analyses were within the laboratory recovery limits. The samples were also analyzed within the acceptable EPA holding times. The data from the McCampbell Analytical and TestAmerica laboratories are considered to be of good quality. Laboratory analytical reports and chain-of-custody records are included in Appendix E.

VI. DISCUSSION

A. Environmental Screening Levels

To assess if the identified COCs in soil vapor pose a risk to human health and the environment, AllWest compared detected concentrations to ESLs for commercial land use compiled by the RWQCB in *Table E - Environmental Screening Levels (ESLs) – Indoor Air and Soil Gas (Vapor Intrusion Concerns), Commercial / Industrial Land Use Only* (RWQCB, November 2007, revised May 2008). The ESL for PCE as soil gas in a commercial/industrial setting is 1,400 µg/m^3, and 410 µg/m^3 in a residential setting.

AllWest also compared soil vapor, IAQ and AAC data generated during this assessment to the State of California Environmental Protection Agency (CalEPA), *Use of California Human Health Screening Levels (CHHSLs) in Evaluation of Contaminated Properties, Table 3 - California Human Health Screening Levels for Indoor Air and Soil Gas*, January 2005, revised September 23, 2010. The soil vapor CHHSL for PCE is 600 µg/m^3 for commercial/industrial sites and 180 µg/m^3 for residential sites constructed without engineered fill. The ESLs and CHHSLs are based on a target cancer risk of 1.0 x 10^{-6} (1/1,000,000) for an average 8-hour per day exposure period in a commercial/industrial workplace setting. Relevant ESLs and CHHSLs for VOCs detected in site soil vapor samples are listed in Table 2.

The PCE soil vapor sample concentration of 17,000 detected in probe SVP-1 exceeded the corresponding ESL and CHHSL of 1,400 µg/m^3 and 600 µg/m^3 for commercial/industrial land use. The PCE soil vapor sample concentration of 230 µg/m^3 in probe SVP-14 exceeded the CHHSL for residential land use of 180 µg/m^3, but not the commercial land use CHHSL. None of the other VOCs detected in soil vapor samples, including TCE, exceeded their applicable ESLs or CHHSLs (where established) for commercial/industrial land use, or the more stringent ESLs and CHHSLs for residential land use, and therefore are unlikely to present a potential indoor vapor intrusion impact. ESLs and/or CHHSLs have not been established for several of the VOCs detected in soil vapor samples, including

ethanol, ethyl acetate, 4-ethyltoluene, isopropyl alcohol, tetrahydrofuran, 1,2,4-trimethylbenzene, and 1,3,5-trimethylbenzene.

With the exception of TCE, none of the other detected VOCs are PCE breakdown products originating from onsite dry cleaning or other known subject site activities. In the opinion of AllWest most of them appear to be laboratory contaminants and therefore are not chemicals of concern (COCs) for this investigation (Table 1). The petroleum hydrocarbon constituents benzene, toluene, ethylbenzene and xylenes (BTEX) may be potential COCs, but are unlikely to originate from the subject property and most likely originate from the adjacent Shell gasoline service station site.

B. Contaminant Distribution

PCE was detected in soil vapor samples from probe SVP-1, located in the downgradient direction east of the former Moon's Cleaners, from probes SVP-9 and SVP-10, located in the parking area west to west-northwest and up-gradient of the former Moon's Cleaners, and from probes SVP-14 and SVP-15, located in the parking area northeast and cross-gradient of the former Moon's Cleaners. The highest detected PCE concentration, and the only detected TCE concentration, was in the sample collected from probe SVP-1; this location correlates with sample locations from previous investigations where PCE was detected in downgradient groundwater samples, and indicates a likely release of PCE from the former Moon's Cleaners or one of the previous dry cleaners occupying that tenant space.

Since no soil samples have been collected and analyzed for VOCs at the subject site, the lateral and vertical extent of any potential PCE release to soil at the former Moon's Cleaners dry cleaning machine source area has not been delineated.

Since the other VOCs detected in soil vapor samples were not PCE breakdown products, they apparently do not originate from onsite dry cleaning operations or other known subject site activities. In the opinion of AllWest, most of these VOCs appear to be laboratory contaminants and are not regarded as COCs for this investigation. Petroleum hydrocarbon (BTEX) constituents detected in soil vapor samples may be potential COCs, but likely originate from the adjacent Shell gasoline service station site or other offsite sources. A summary of soil vapor sample analytical data is presented in Table 2. Soil vapor sample locations and PCE concentrations are shown in Figure 2.

VII. CONCLUSIONS AND RECOMMENDATIONS

A. Conclusions

AllWest concludes the detection of PCE in the soil vapor sample SVP-1 at levels exceeding the applicable commercial/industrial ESL and CHHSL indicates a potential for indoor vapor intrusion impact within the adjacent former Moon's Cleaners and other vacant building tenant spaces at 2121, 2525 and 2129 St. Francis Drive. Since PCE was not detected in soil vapor samples SVP-2 through SVP-5 collected within tenant spaces in the building at 2050 Channing and 2103 through 2109 St. Francis Drive, AllWest concludes that no indoor vapor intrusion impact by PCE soil vapor exists at that building. Since the PCE detected in soil vapor sample SVP-15 located adjacent to the building at 2080 Channing Avenue was below the applicable commercial/industrial ESL and CHHSL, AllWest concludes that no potentially significant indoor vapor intrusion impact by PCE soil vapor exists at that building.

The subject site building at 2121 through 2129 St. Francis Drive is scheduled to be moved to a new location immediately to the west during redevelopment in the near future. The former location will then be used as a parking lot. Since PCE concentrations in soil vapor samples from probes SVP-8, SVP-9 and SVP-10 located within the proposed new building location did not exceed applicable ESLs or CHHSLs, AllWest concludes that no potentially significant indoor vapor intrusion impact by PCE soil vapor will exist following site redevelopment.

B. Recommendations

Due to the potential presence of PCE-impacted soils beneath the subject site building at 2121 through 2129 St. Francis Drive, AllWest recommends preparation of a Soil Management Plan prior to its move to the site's western margin, site grading and redevelopment.

VIII. REPORT LIMITATIONS

The work described in this report is performed in accordance with the Environmental Consulting Agreements between Ho Holdings No. 1 LLC c/o Sand Hill Property Company (Client) and AllWest Environmental, Inc, dated November and Decemeber 2011. AllWest has prepared this report for the exclusive use of the Client for this particular project and in accordance with generally accepted practices at the time of the work. No other warranties, certifications or representations, either expressed or implied are made as to the professional advice offered.

The services provided for the Client were limited to their specific requirements; the limited scope allows for AllWest to form no more than an opinion of the actual site conditions. No matter how much research and sampling may be performed the only way

to know about the actual composition and condition of the subsurface of a site is through excavation.

The conclusions and recommendations contained in this report are made based on observed conditions existing at the site, laboratory test results of the submitted samples, and interpretation of a limited data set. It must be recognized that changes can occur in subsurface conditions due to site use or other reasons. Furthermore, the distribution of chemical concentrations in the subsurface can vary spatially and over time. The results of chemical analysis are valid as of the date and at the sampling location only. AllWest is not responsible for the accuracy of the test data from an independent laboratory nor for any analyte quantities falling below the recognized standard detection limits or for the method utilized by the independent laboratories.

IX. REFERENCES

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TABLE

TABLE 1

SUMMARY OF SOIL VAPOR SAMPLE ANALYTICAL DATA
EDGEWOOD PLAZA
PALO ALTO, CALIFORNIA
AllWest Project No. 11165.23

Sample Number	Date	Sample Depth feet bgs	Acetone µg/m^3	Benzene µg/m^3	Chloroform µg/m^3	Ethanol µg/m^3	Ethyl Acetate µg/m^3	Ethylbenzene µg/m^3	4-Ethyltoluene µg/m^3	Helium* % Volume	Isopropyl Alcohol (IPA) µg/m^3	Tetrachloroethene (PCE) µg/m^3	Tetrahydrofuran (THF) µg/m^3	Toluene µg/m^3	1,1,1-Trichloroethane (1,1,1-TCA) µg/m^3	Trichloroethene (TCE) µg/m^3	1,2,4-Trimethylbenzene µg/m^3	1,3,5-Trimethylbenzene µg/m^3	Total Xylenes µg/m^3	Other VOCs µg/m^3
SVP-1	11/17/2011	5	ND (<120)	7.0	110	ND (<96)	ND (<7.3)	11	ND (<10)	0.042	ND (<50)	**17,000**	ND (<6.0)	66	ND (<11)	520	12	ND (<10)	46	ND (varies)
SVP-2	11/17/2011	5	ND (<120)	ND (<6.5)	ND (<9.9)	ND (<96)	ND (<7.3)	ND (<8.8)	ND (<10)	6.4	ND (<50)	ND (<14)	ND (<6.0)	8.6	ND (<11)	ND (<11)	ND (<10)	ND (<10)	ND (<27)	ND (varies)
SVP-3	11/17/2011	5	ND (<120)	ND (<6.5)	ND (<9.9)	ND (<96)	ND (<7.3)	ND (<8.8)	ND (<10)	0.0079	ND (<50)	ND (<14)	ND (<6.0)	ND (<7.7)	ND (<11)	ND (<11)	12	ND (<10)	ND (<27)	ND (varies)
SVP-4	11/17/2011	5	ND (<120)	ND (<6.5)	ND (<9.9)	ND (<96)	ND (<7.3)	ND (<8.8)	ND (<10)	0.55	ND (<50)	ND (<14)	ND (<6.0)	ND (<7.7)	ND (<11)	ND (<11)	11	ND (<10)	ND (<27)	ND (varies)
SVP-5	11/17/2011	5	ND (<120)	ND (<6.5)	ND (<9.9)	ND (<96)	ND (<7.3)	ND (<8.8)	ND (<10)	NA	ND (<50)	ND (<14)	ND (<6.0)	15	ND (<11)	ND (<11)	ND (<10)	ND (<10)	ND (<27)	ND (varies)
SVP-6	11/17/2011	5	ND (<120)	ND (<6.5)	ND (<9.9)	ND (<96)	ND (<7.3)	ND (<8.8)	ND (<10)	0.012	ND (<50)	ND (<14)	ND (<6.0)	ND (<7.7)	ND (<11)	ND (<11)	ND (<10)	ND (<10)	ND (<27)	ND (varies)
SVP-7	11/17/2011	5	ND (<120)	ND (<6.5)	ND (<9.9)	ND (<96)	ND (<7.3)	47	11	0.12	ND (<50)	ND (<14)	ND (<6.0)	21	18	ND (<11)	25	ND (<10)	310	ND (varies)
SVP-8	1/3/2012	5	ND (<120)	ND (<6.5)	ND (<9.9)	59	25	18	12	0.032	ND (<50)	ND (<14)	7.0	28	ND (<11)	ND (<11)	59	ND (<10)	110	ND (varies)
SVP-9	1/3/2012	5	ND (<120)	ND (<6.5)	ND (<9.9)	170	220	25	21	ND (<0.002)	ND (<50)	41	ND (<6.0)	38	ND (<11)	ND (<11)	82	17	180	ND (varies)
SVP-10	1/3/2012	5	ND (<120)	ND (<6.5)	ND (<9.9)	ND (<96)	ND (<7.3)	47	30	0.0056	ND (<50)	88	ND (<6.0)	74	ND (<11)	ND (<11)	110	37	300	ND (varies)
SVP-11	1/3/2012	5	ND (<120)	ND (<6.5)	ND (<9.9)	210	27	12	ND (<10)	0.0054	ND (<50)	ND (<14)	ND (<6.0)	13	ND (<11)	ND (<11)	38	ND (<10)	72	ND (varies)
SVP-12	1/3/2012	5	ND (<120)	ND (<6.5)	ND (<9.9)	96	13	ND (<8.8)	10	0.0076	ND (<50)	ND (<14)	ND (<6.0)	ND (<7.7)	ND (<11)	ND (<11)	20	ND (<10)	ND (<27)	ND (varies)
SVP-13	1/3/2012	5	ND (<120)	ND (<6.5)	ND (<9.9)	940	140	9.8	11	0.010	88	ND (<14)	ND (<6.0)	10	ND (<11)	ND (<11)	65	13	73	ND (varies)
SVP-14	1/3/2012	5	ND (<120)	ND (<6.5)	ND (<9.9)	580	28	ND (<8.8)	14	0.0036	ND (<50)	**230**	ND (<6.0)	ND (<7.7)	ND (<11)	ND (<11)	61	19	52	ND (varies)
SVP-15	1/3/2012	5	370	ND (<6.5)	ND (<9.9)	6,400	410	ND (<8.8)	12	0.028	110	78	ND (<6.0)	ND (<7.7)	ND (<11)	ND (<11)	48	15	49	ND (varies)
ESL	Residential		660,000	84	460	NL	NL	980	NL	NL	NL	410	NL	63,000	460,000	1,200	NL	NL	21,000	Varies
ESL	Commercial		1,800,000	280	1,500	NL	NL	3,300	NL	NL	NL	1,400	NL	180,000	1,300,000	4,100	NL	NL	58,000	Varies
CHHSL	Residential		NL	36	NL	NL	NL	420	NL	NL	NL	180	NL	140,000	990,000	530	NL	NL	320,000	Varies
CHHSL	Commercial		NL	120	NL	NL	NL	1,400	NL	NL	NL	600	NL	380,000	2,800,000	1,800	NL	NL	890,000	Varies

Notes:

VOCs Volatile Organic Compounds
µg/m^3 Micrograms per cubic meter = 0.001 micrograms per liter
ND Not detected at or below laboratory reporting limit (reporting limit in parenthesis)
NA Not Analyzed
NL Not Listed
* Leak Detection Gas

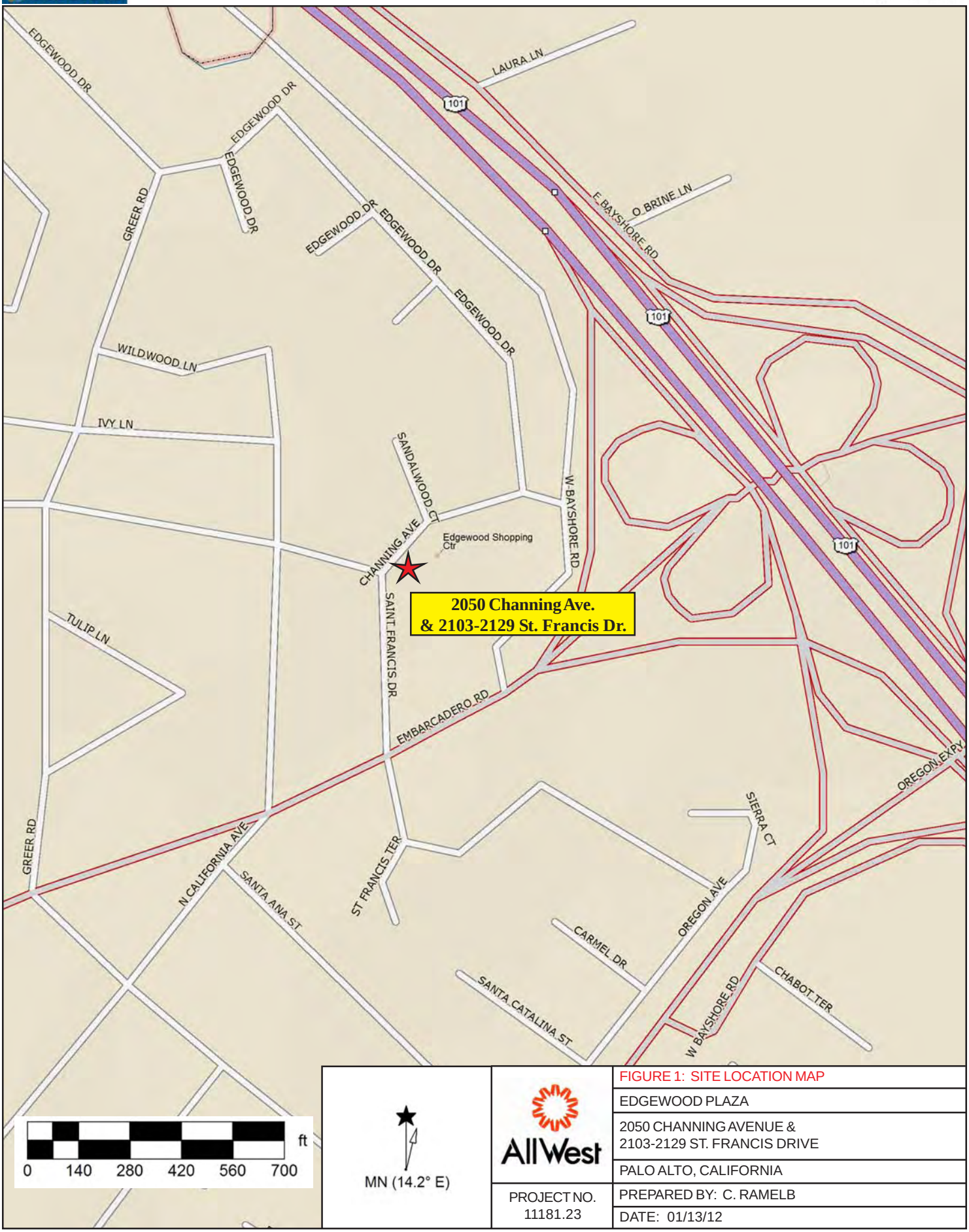
ESL Environmental Screening Level (Screening For Environmental Concerns At Sites With Contaminated Soil and Groundwater, California Regional Water Quality Control Board, San Francisco Bay, INTERIM FINAL - November 2007 (revised May 2008). Table E, Shallow Soil Gas Screening Levels, For Evaluation Of Potential Vapor Intrusion Concerns, Residential Exposure, Commercial/Industrial Land Use).

CHHS California Environmental Protection Agency (CalEPA), Office of Environmental Health Hazard Assessment (OEHHA) Use of California Human Health Screening Levels (CHHSLS) in Evaluation of Contaminated Properties, Table 3, Soil-Gas Screening Numbers for Volatile Chemicals Below Buildings Constructed Without Engineered Fill Below Sub-Slab Gravel, January 2005, updated tables September 23, 2010.

FIGURES

DeLORME

Topo USA® 6.0



AllWest

FIGURE 1: SITE LOCATION MAP

EDGEWOOD PLAZA

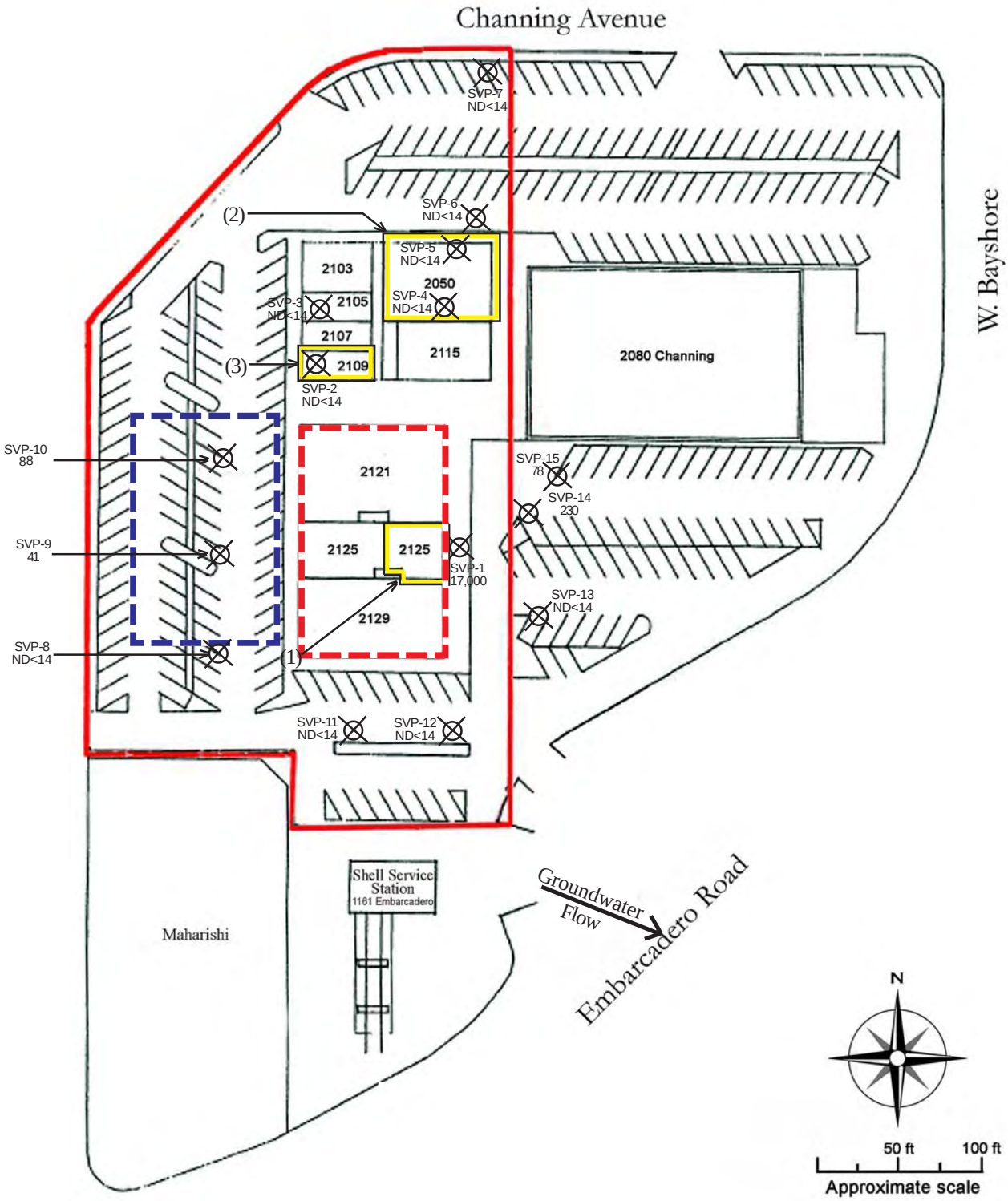
2050 CHANNING AVENUE &
2103-2129 ST. FRANCIS DRIVE

PALO ALTO, CALIFORNIA

PROJECT NO.
11181.23

PREPARED BY: C. RAMELB

DATE: 01/13/12



LEGEND

(1) 2125 St. Francis: Quik/Frank's/Moon's Cleaners (1965-present)
(2) 2050 Channing: Edgewood Plaza Cleaners (1973-1991)
(3) 2109 St. Francis: Edgewood Plaza Cleaners (1965-1969)

SVP-1 Soil Vapor Probe

ND<14 Not Detected above listed limit in µg/m³

17,000 PCE soil vapor concentration, µg/m³

Site boundary

Former/current cleaners

Existing building

Proposed relocated building

AllWest

FIGURE 2: SITE PLAN WITH SOIL VAPOR BORINGS AND PCE CONCENTRATIONS, 11/17/11 & 01/03/12

EDGEWOOD PLAZA

2050 CHANNING AVENUE & 2103-2129 ST. FRANCIS DRIVE

PROJECT NO. 11181.23

PALO ALTO, CALIFORNIA

PREPARED BY: C. RAMELB (01/13/12)

Appendix A

STANDARD GEOPROBE® AND SUB-SLAB PROBE SOIL VAPOR SAMPLING PROCEDURES

Geoprobe® PRT Soil Vapor Probe Advancement Sampling

The Geoprobe® Post Run Tubing (PRT) soil vapor sampling process involves driving into the subsurface a disposable Geoprobe® sampling probe with expendable tip and a PRT adapter that are connected to 4-foot sections of Geoprobe® 1.25-inch inside diameter (ID) extension rods. The PRT adapter has a reverse-thread adapter at the upper end to allow the connection of flexible soil vapor sampling tubing with a PRT tubing adaptor after the installation (post-run) of the tip. The entire sampling assembly, the sampling tip, PRT adapter, and the Geoprobe® extension rods, is driven into the subsurface by a truck-mounted hydraulic percussion hammer. The sampler is driven to the desired depth as additional rods are connected. At the desired sampling depth, a sufficient length of disposable flexible polyethylene or Teflon® sample tubing is first lowered through the center of the extension rod and connected to the PRT adapter. The extension rod is then retracted 3 to 4 inches to create a small void around the PRT adapter and the expendable sampling tip for extracting a soil vapor sample from that location. Bentonite chips will be used to fill the annular space between the probe and the subgrade material to the ground surface. The bentonite will then be hydrated with distilled water. The temporary Geoprobe® PRT soil vapor probe will be sampled at least 30 minutes following driving of the probe, to allow vapor conditions to equalize in subsurface materials and the bentonite surface seal to hydrate.

Sub Slab Soil Vapor Probe Installation

Semi-permanent sub-slab soil vapor probes are emplaced as follows: A 1-inch diameter hole is drilled through the concrete floor slab using a portable electric drill. The boreholes are advanced approximately 0.5 feet bgs into the subgrade material beneath the floor slab. Stainless steel vapor probes 2 inches long by 0.5 inches in diameter, tipped with porous plastic membranes, will be inserted to the bottom of each sub-slab borehole. The probe tips will be attached to lengths of 0.25-inch diameter Teflon® tubing extending to the top of the floor slab. A fine sand filter pack will be placed in the borehole annulus around the probe. Bentonite chips will then used to fill the borehole annular space above the filter pack between the probe and the to the floor slab base. The bentonite will then be hydrated with distilled water. Portland cement will be poured into the borehole annulus in the concrete floor slab to seal the probe. Care will be taken not to over hydrate the bentonite and cement to limit the introduction of excess moisture to the subsurface. Each probe will be constructed with a brass threaded fitting and cap attached to the top of the Teflon® tubing and recessed below the concrete floor. A plastic cap will then be placed flush with the concrete floor to minimize tripping hazards. AllWest will allow a minimum of two days prior to sampling to allow the cement to setup and for subsurface conditions to stabilize.

Soil vapor sampling procedures will be similar for both the semi-permanent and temporary vapor probes, in general accordance with *Interim Final, Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air - DTSC December 15, 2004 (Revised February 7, 2005).* Soil vapor sampling will not be performed if measurable precipitation has occurred within the previous five days.

Soil Vapor Sampling via Syringe and Mobile Laboratory

The surface end of the flexible tubing is first connected to a vacuum tank with a diaphragm pump to purge the ambient air from the tubing. After a minimum of one minute purging time to remove at least 3

sampling system volumes, the flexible tubing is connected to a syringe collect a vapor sample. The syringe is them immediately transported to an on-site mobile laboratory for analysis.

Soil Vapor Sampling via Summa Canister

AllWest will collect soil vapor samples in laboratory prepared 6-liter capacity SUMMA canisters. Prior to vapor purging and sample collection, a vacuum leak test of the flow-controller/gauge manifold assembly we be performed for a minimum of 5 minutes. Prior to sample collection, approximately 1 liter of soil vapor (or a minimum of 3 sampling system volumes) will be purged at a flow rate of approximately 200 milliliters per minute (ml/min) from each sub-slab vapor probe using a dedicated 6-liter capacity SUMMA purge canister.

During vapor sample collection, a vacuum leak test of the flow-controller/gauge manifold assembly will be performed using isopropyl alcohol (IPA), diflouroethane or helium as a leak tracer inside an airtight shroud. IPA concentrations inside the shroud will be monitored using a photo-ionization detector (PID). An ambient air sample will collected using a SUMMA canister inside the leak detection shroud during at least one soil vapor probe sampling to measure IPA, difluoroethane or helium concentrations inside the shroud concurrent with PID readings and soil vapor sample analysis. Flow rates of approximate 200 milliliters per minute (ml/min) will be used to fill the canisters. The canisters will be filled to approximately 80% of capacity. All pertinent field observations, pressure, times and readings will be recorded. Sample containers will be labeled, placed in a dark container and transported under chain-of-custody control to the analytical laboratory.

Appendix B

McCampbell Analytical, Inc.
"When Quality Counts"
1534 Willow Pass Road, Pittsburg, CA. 94565-1701
Toll Free Telephone : (877) 252-9262 / Fax : (925) 252-9269
http://www.mccampbell.com / E-mail: main@mccampbell.com

Rev:1.0
10/28/2011

Soil Gas Sampling with MAI Helium Shroud
Field Data Sheet

Palo Alto, CA

Location:	Edgewood Shopping Center	**Date:**	11/17/11
Operator:	LN/CRH	**Time:**	1029 - 1035
Sample ID:	SVP1	**He Shroud Serial Number:**	962
Canister SN#:	6408	**Manifold SN#:**	MAN316T-775

Time:	Shroud Content:
1030	21.8

Purged Volume:	Given sample train volumes:	Leak Test Pass/Fail:	Comments/notes:
[redacted] mL 300		Pass	1025 start purge 1.5 in Hg

Soil Permeability Test Results:	Comments/Notes:
Flow:	
Vacuum: 0 in Hg	

Shut In Test:		Comments/Notes:
Time:	**Vacumm:**	
1018	30 in Hg	

Well Integrity Test:		Comments/Notes:
replicate	**Meter reading**	

Sampling:				Comments/Notes:
	Time	**Gauge1**	**Gauge2**	
Start	[redacted] 1029			Initial summa Volume 30 in Hg
End	1035	2.5	[redacted] 5.4	

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Rev:1.0
10/28/2011

Soil Gas Sampling with MAI Helium Shroud
Field Data Sheet

Location: Edgewood SC, Palo Alto, CA	Date: 11/17/11
Operator: LN/CH	Time: 1507-1512
Sample ID: SVP-2	He Shroud Serial Number: AllWest 1
Canister SN#: 6305	Manifold SN#: MAN316T-776

Time:	Shroud Content:
1509	24.9
1510	23.2
1511	22.5

Purged Volume:	Given sample train volumes:	Leak Test Pass/Fail:	Comments/notes:
300 mL		pass	1501 Start purge 1503 end purge

Soil Permeability Test Results:	Comments/Notes:
Flow:	
Vacuum:	

Shut In Test:		Comments/Notes:
Time:	Vacumm:	
1500	21.5	

Well Integrity Test:		Comments/Notes:
replicate	Meter reading	

Sampling:				Comments/Notes:
	Time	Gauge1	Gauge2	
Start	1507	29.5	29.5	
End	1512	5	5	

PID reading 0.00 - 0.01

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10/28/2011

Soil Gas Sampling with MAI Helium Shroud
Field Data Sheet

Location: ~~SVP-3~~ Edgewood Plaza	Date: 11/17/11
Operator: LN / CH	Time: 1428 - 1435
Sample ID: SVP-3	He Shroud Serial Number: All west
Canister SN#: 6420	Manifold SN#: ~~MAN316T-777~~ no good - failed leak test 2nd = MAN316T-779

Time:	Shroud Content:
14:28	14.2%
14:29	20.8%
14:30	19.7%
14:31	19.1%
14:31	22%
14:33	21.1%
14:34	20.8%

Purged Volume:	Given sample train volumes:	Leak Test Pass/Fail:	Comments/notes:
14:22	300 ml	Fail #1 Pass #2	1st leak test failed, replaced manifold

Soil Permeability Test Results:	Comments/Notes:
Flow: 150 ml/min	
Vacuum: 0"	

Shut In Test:		Comments/Notes:
Time:	Vacumm:	First manifold failed leak test (MAN316T-777), replaced with MAN316T-779 (last un-used manifold)
14:06	22.5" - failed	
14:19	22.5" - 2nd test	
14:21	22.5 - passed 2nd test	

Well Integrity Test:		Comments/Notes:
replicate	Meter reading	

Sampling:				Comments/Notes:
	Time	Gauge1	Gauge2	Gauge #2 inaccurate
Start	14:28	28.8"	30+"	
End	14:35	3.1"	6.0"	

0.3-0.4 ppm PID reading from sample tube,
0.4 ppm PID reading ambient air

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Soil Gas Sampling with MAI Helium Shroud
Field Data Sheet

Location: Edgewood SC, Palo Alto, CA	**Date:** 11/17/11
Operator: LN / CRH	**Time:** 1318 - 1323
Sample ID: SVP-4	**He Shroud Serial Number:** Allwest 1
Canister SN#: 6169	**Manifold SN#:** MAN 316T-778

Time:	Shroud Content:
1322	23.9

Purged Volume:	Given sample train volumes:	Leak Test Pass/Fail:	Comments/notes:
200mL		pass	Start purge 1313 End purge 1314

Soil Permeability Test Results:	Comments/Notes:
Flow:	
Vacuum:	

Shut In Test:		Comments/Notes:
Time:	Vacumm:	
1312	Gauge 1: 25.8 Gauge 2: 26.6	

Well Integrity Test:		Comments/Notes:
replicate	Meter reading	

Sampling:	Time	Gauge1	Gauge2	Comments/Notes:
Start	1318	30	30	
End	1323	5	5	

0.1 - 0.2 ppm PID reading from sample tube. 0 ppm ambient air

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Soil Gas Sampling with MAI Helium Shroud
Field Data Sheet

Location:	Edgewood SC, Palo Alto, CA	**Date:**	11/17/11
Operator:	LN / CRH	**Time:**	1236-1241
Sample ID:	SVP 5	**He Shroud Serial Number:**	CONBOX-962
Canister SN#:	6302	**Manifold SN#:**	MAN316T - 780

Time:	Shroud Content:
1221	27.8

Purged Volume:	Given sample train volumes:	Leak Test Pass/Fail:	Comments/notes:
200 mL		Pass	Had to remove shroud to undo kink in sample tubing, purged OK after

Soil Permeability Test Results:	
Flow:	no flow
Vacuum:	19 in Hg

Comments/Notes: Kink in sample tube, had to remove He Shroud to undo

Shut In Test:	
Time:	Vacumm:
1221	27
1223	27

Comments/Notes:

Well Integrity Test:	
replicate	Meter reading

Comments/Notes:

Sampling:	Time	Gauge1	Gauge2
Start	1236	30	30
End	1241	5	5

Comments/Notes: No He shroud in place while sampling

Don't analyze for He, had to remove He leak detect shroud to un-do kink in sample tubing; temporarily out of helium until new canister arrived - no shroud while sampling

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10/28/2011

Soil Gas Sampling with MAI Helium Shroud
Field Data Sheet

Location: Edgewood SC, Palo Alto, CA	Date: 11/17/11
Operator: LN / CRH	Time: 1129 - 1134
Sample ID: SVP6	He Shroud Serial Number: CON BOX - 962 [redacted]
Canister SN#: A7509	Manifold SN#: MAN316T-774

Time:	Shroud Content:
1113	36.5
1115	23.9
1129	16.5

Purged Volume:	Given sample train volumes:	Leak Test Pass/Fail:	Comments/notes: 26.5 in Hg. 1126 start purge 1128 end purge
200 mL		pass	

Soil Permeability Test Results:	Comments/Notes:
Flow:	
Vacuum: 0 in Hg	

Shut In Test:		Comments/Notes:
Time:	Vacumm:	
1121	26.5	
1122	26.5	

Well Integrity Test:		Comments/Notes:
replicate	Meter reading	

Sampling:				Comments/Notes:
	Time	Gauge1	Gauge2	
Start	1129	28	28.5	
End	1134	4.2	4.5	

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Soil Gas Sampling with MAI Helium Shroud
Field Data Sheet

Location: Edgewood Plaza	Date: 11/17/11
Operator: LN / CH	Time: 1549 - 1554
Sample ID: SVP-7	He Shroud Serial Number: Allwest 1
Canister SN#: A7518	Manifold SN#: MAN316T-776 (re-used after decon)

Time:	Shroud Content:
1550	24.6
1553	26.8
	22.7

Purged Volume:	Given sample train volumes:	Leak Test Pass/Fail:	Comments/notes:
300ml		Pass	purged 15:40-15:43

Soil Permeability Test Results:	Comments/Notes:
Flow: 150 ml/min	
Vacuum: 0"	

Shut In Test:		Comments/Notes:
Time:	Vacumm:	
15:37	19.5"	
15:40	19.5"	

Well Integrity Test:		Comments/Notes:
replicate	Meter reading	

Sampling:				Comments/Notes:
	Time	Gauge1	Gauge2	
Start	1549	28.9"	28.9"	
End	1554	5	5	

PID reading from sample tube = 0.3 ppm
ambient air (outdoor) = 0 ppm

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CHAIN OF CUSTODY RECORD

TURN AROUND TIME ☐ RUSH ☐ 24 HR ☐ 48 HR ☐ 72 HR ☑ 5 DAY

EDF Required? Coelt (Normal) No **Write On (DW)** No

Report To: Christopher Houlihan	**Bill To:** Darlene Torio
Company: AllWest	
530 Howard St. #300	
San Francisco, CA 94105	**E-Mail:**
Tele: (415) 391-2510	**Fax:** (415) 391-2008
Project #: 11163.23	**Project Name:** Edgewood SC
Project Location: 2103-2125 St. Francis Dr. Palo Alto, CA	
Sampler Signature:	

Lab Use Only

Pressurized By	Date	Pressurization Gas	
		N2	He

Helium Shroud SN#: ConBox-962, AllWest 1

Other:

Notes: Do not analyze SVP-5 for Helium. Reused manifolds were purged with Helium before re-use.

Field Sample ID (Location)	Collection Date	Collection Time	Canister SN#	Manifold / Sampler Kit SN#	Analysis Requested	Indoor Air	Soil Gas	Canister Pressure/Vacuum Initial	Final	Receipt	Final (psi)
SVP-1	11/17/11	1029	6408	775	VOCs TO-15, He ASTMD-1946		✓	30"	5.4"		
SVP-6		1129	A7509	774	VOCs TO-15, He ASTMD 1946		✓	28.0"	4.5"		
SVP-5		1236	6302	780	VOCs TO-15		✓	30"	5"		
SVP-4		1318	6169	778	VOCs TO-15, He ASTMD-1946		✓	30"	5"		
SVP-3		1428	6420	779			✓	28.8"	3.1"		
SVP-2		1507	6306	776			✓	29.5"	5.0"		
SVP-7	↓	1549	A7518	776	↓		✓	28.9"	5"		

Relinquished By:	Date:	Time:	Received By:
	11/18/11		
Relinquished By:	Date:	Time:	Received By:
Relinquished By:	Date:	Time:	Received By:

Temp (°C): _____ Work Order #: _____

Equipment Condition: _____

Shipped Via: _____

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SOIL GAS VAPOR FIELD LOG

Project No: 11181.23 **Project Name:** Edgewood-Palo Alto-SVS2

Date: 1/3/2012 **Vapor Probe No:** SVP-8 **Serial No:** 1L Summa 1461, 6L-Purge Summa #4712

Regulatory Agencies: SCCEHD

Contractor: Vironex / AllWest

Hole Diameter: 2" **Total Depth:** 5' **Grout/Bentonite:** 6" sand, rest bentonite

Probe Diameter: plastic 1/4"ID x 1/2"OD x 2" **Line Length:** ~~6~~ 6.5' #MAN316-826 **Purge Volume:** 500 ml

Tracer Gas: Helium **Flow Regulator:** 150 (ml/min) **Leak Test:** Pass/Fail

Laboratory Name and Number: McCampbell Analytical, TO-15

SAMPLE COLLECTION

Start Time	Time Elapsed	Pressure	Remarks
10:34	—	-29.6"	Manifold Leak Check, Summa #4712 (purge)
10:39	5	-29.6"	Stopped manifold leak check - passed
10:47	—	-29.6"	Started purge (Summa #4712)
10:51	4	-29.1"	Stopped purge (2.5" = 0.5L)
11:04	—	-27.5"	Start sample, helium ~20%, Summa #1461
11:08	4	-11"	He = 18.2%, injecting more to ~19+%
11:09	5	-4.8"	Stopped sample - flow rate = 153 ml/min
			Average He conc = 19.1%

Remarks: Initial summa #1461 vaccum = -26.5" Hg - leak? Initial purge Summa #4712 vacuum = -28.5" Hg, (MAN316M-984) using separate vaccuum gauge to check. Tried 2nd vacuum gauge: initial #1461 vacuum = -27.5" Hg, #4712 = -29.5" (MAN316M-985) ← was from ambient air manifold - broke flow restrictor connector. Initial helium conc ~20% in shroud, topped off as needed. 0.0 ppm PID reading from sample tube post-sample (was 0.3 ppm pre-purge)

Sampler: Leonard Niles

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SOIL GAS VAPOR FIELD LOG

Project No: 11181.28 **Project Name:** Edgewood-Palo Alto-SVS-2

Date: 1/3/2012 **Vapor Probe No:** SVP-9 **Serial No:** 6204 1L
6L-Purge Summa #4712

Regulatory Agencies: SCCEHD

Contractor: Vironex / AllWest

Hole Diameter: 2" **Total Depth:** 5' **Grout/Bentonite:** 6" #2/16 sand, rest ~~bentonite~~

Probe Diameter: plastic 1/4" ID, 1/2" OD x 2" **Line Length:** 7' #MAN316-718 **Purge Volume:** 500 ml

Tracer Gas: helium **Flow Regulator:** 150 (ml/min) **Leak Test:** (Pass)/Fail

Laboratory Name and Number: McCampbell Analytical, VOCs - TO-15

SAMPLE COLLECTION

Start Time	Time Elapsed	Pressure	Remarks
11:50	—	-21.0"	Start manifold leak check - Summa #4712
11:52	2	-21.0"	Stop leak check - passed
11:53	—	-21.0"	start purge - Summa #4712 (2.5" = 500ml)
11:55	2	-18.5"	stop purge
12:00	—	-29.5"	start sample - Summa #6204
12:02	2	-23.0"	He = 20.2% in shroud
12:03	3	-16.0"	He = 20.0%
12:04	4	-10.0	He = 18.5%
12:05	5	-4.5"	stopped sample, He = 21.6%

Remarks: Initial helium concentration in shroud = 20.2%
0.0 ppm PID reading from sample tube after sampling
Initial Summa #6204 vacuum = -28.9" Hg (MAN316M-985 gauge)
Sample flow rate = 166.6 ml/min
Average He concentration = 20.2%

Sampler: Leonard Niles

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SOIL GAS VAPOR FIELD LOG

Project No: 11181.23 **Project Name:** Edgewood - Palo Alto - SVS-2

Date: 1/3/2012 **Vapor Probe No:** SVP-10 **Serial No:** 6207 (1L 6L Purge Summa #4712)

Regulatory Agencies: SCCEHD

Contractor: Vironex / AllWest

Hole Diameter: 2" **Total Depth:** 5' **Grout/Bentonite:** 6" #2/16 sand at bottom rest hydrated bentonite to surface

Probe Diameter: 1/4" ID, 1/2" OD X2" long (plastic) **Line Length:** 6.5' #MAN316-819 **Purge Volume:** 500 ml

Tracer Gas: helium **Flow Regulator:** 150 (ml/min) **Leak Test:** (Pass)/Fail

Laboratory Name and Number: McCampbell Analytical

SAMPLE COLLECTION

Start Time	Time Elapsed	Pressure	Remarks
12:37	—	-17.1"/-18.1"	Manifold leak check, Summa #4712 (2 gauges read different)
12:41	4	-17.1"/-18.1"	Stopped leak check - passed
12:42	—	-17.1"/-18.1"	Started purge, Summa #4712 (2.5" = 0.5L)
12:46	4	-14.6"/-15.4"	Stopped purge
12:51	—	-28.0"/-29.0"	Started sample, He ~~17.6%~~ 20.3%
12:52	1	-17.0"/-18.0"	He = 21.2% in shroud
12:54	3	-10.0"/-11.0"	He = 20.0%
12:55	4	-4.1"/-5.1"	Stopped sample, He = 18.9%
			sample flow rate = 199 ml/min

Remarks: Initial Summa #6207 vacuum = -28.9" Hg, used separate vacuum gauge #MAN316M-985. 2 gauges on manifold #MAN316-819 read differently, ~1" Hg apart (Higher one accurate?) Initial He concentration in shroud ~20-21% PID reading from sample tube post-sample = 1.3 ppm Average He concentration = 20.1%

Sampler: Leonard Niles

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SOIL GAS VAPOR FIELD LOG

Project No: 11181.23 **Project Name:** Edgewood-Palo Alto SVS-2

Date: 1/3/2012 **Vapor Probe No:** SVP-11 1L Summa **Serial No:** A7509
6L Purge Summa #4712

Regulatory Agencies: SCCEHD

Contractor: Vironex / AllWest

Hole Diameter: 2" **Total Depth:** 5' **Grout/Bentonite:** 6" #2/16 Sand-bottom bentonite to top

Probe Diameter: (plastic) 1/4"ID, 1/2"OD, 2"L **Line Length:** 6.5' #MAN316T-776 **Purge Volume:** 500 ml

Tracer Gas: helium **Flow Regulator:** 150 (ml/min) **Leak Test:** Pass/Fail

Laboratory Name and Number: McCampbell Analytical, TO-15 - VOCs

SAMPLE COLLECTION

Start Time	Time Elapsed	Pressure	Remarks
13:29	—	-15.2"/14.1"	manifold leak check, Summa #4712
13:32	3	-15.2"/14.1"	stopped check-passed
13:33	—	-13.2"/14.1"	start purge, summa #4712
13:36	3	-12.7"/11.9"	stop purge, -2.5" = 0.5L
13:43	—	-29.2"	start sample, Summa #A7509
13:45	2	-20"	He = 19.9% in shroud
13:46	3	-14"	He = 20.5%
13:46	3½	-10"	He = 20.3%
13:48	5	-4.7"	He = 20.2%, sample flow rate = 163 ml/min

MAN316T-776

Remarks: Manifold gauges read ≈ 1.1" apart, Initial Summa #A7509 vacuum = -29.4" using separate gauge #MAN316M-985 Initial helium concentration in shroud ≈ 20% dropped to 6%, ~~injected~~ when removed, injected more to bring to ≈ 20% PID reading from sample tube post-sample = 0.0 ppm
Average He concentration = 20.2%

Sampler: Leonard Niles

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SOIL GAS VAPOR FIELD LOG

Project No: 11181.23 **Project Name:** Edgewood-Palo Alto-SVS-2

Date: 1/3/2012 **Vapor Probe No:** SVP-12 **Serial No:** 1L Summa 6302 6L Purge Summa #4712

Regulatory Agencies: SCCEHD

Contractor: AllWest / Vironex

Hole Diameter: 2" **Total Depth:** 5' **Grout/Bentonite:** 6" #2/16 sand - bottom hydrated bentonite to top

Probe Diameter: 1/4" ID, 1/2" OD x 2" L plastic **Line Length:** 6.5' **Purge Volume:** 500 ml

Tracer Gas: Helium **Flow Regulator:** #MAN316T-993 150 (ml/min) **Leak Test:** (Pass)/Fail

Laboratory Name and Number: McCampbell Analytical, TO-15 - VOCs

SAMPLE COLLECTION

Start Time	Time Elapsed	Pressure	Remarks
14:18	—	-13.5"	Start leak check, Summa #4712
14:22	4	-13.4"	Stopped leak check - passed
14:23	—	-13.5"	Start purge, summa #4712
14:25	2 1/2	-11.0"	Stop purge, -2.5" = 0.5 L
14:30	—	-29.4"	start sample, He ≈ 10% in shroud
14:32	2	-20"	He = 20.9% in shroud
14:32	2 1/2	-15"	He = 20.7%
14:33	3	-10"	He = 20.4%
14:35	5	-4.3"	He = 19.7%, sample flow rate = 167 ml/min

Remarks: Initial helium concentration in shroud ≈ 20.8% prior to start, dropped to ≈ 10% when shroud fitted to start sample. Injected more He to bring to ≈ 20%
PID reading = 0.0 ppm from sample tubing, post-sample
Initial Summa 6302 vacuum = -28.9" using separate gauge #MAN316T-985
Average He concentration = 18.3%

Sampler: Leonard Niles

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SOIL GAS VAPOR FIELD LOG

Project No: 1118.23 **Project Name:** Edgewood SVS-2

Date: 1/3/2012 **Vapor Probe No:** SVP-13 **Serial No:** 1L Summa A7525, 6L Purge Summa #4712

Regulatory Agencies: SCCEHD

Contractor: Vironex/AllWest

Hole Diameter: 2" **Total Depth:** 5' **Grout/Bentonite:** 6" #2/16 sand-bottom, hydrated bentonite to top

Probe Diameter: 1/4" ID, 1/2" OD x 2' plastic **Line Length:** 6.5' **Purge Volume:** 500 ml

Tracer Gas: helium **Flow Regulator:** #MAN316T-994, 150 (ml/min) **Leak Test:** Pass/Fail

Laboratory Name and Number: McCampbell Analytical, TO-15, VOCs

SAMPLE COLLECTION

Start Time	Time Elapsed	Pressure	Remarks
15:10	-	-8.3"/10.6"	manifold leak check - Summa #4712
15:17	7	-8.0"/10.2"	stopped check - very slow leak, pass?
15:18	-	-8.2"	Start purge
15:22	4	-5.6"	Stop purge (-2.5" = 0.5L)
15:28	-	-26.5"	start sample (gauge inaccurate)
15:30	2	-20"	@ He = 23.3%
15:31	3	-15"	He = 23%
15:31	3 1/2	-10"	He = 22.7%
15:33	5	-4.7" (6.7")	He = 22.3%, -6.7" is accurate vac

Remarks: Gauges on manifold #MAN316T-994 ~ 2.3" apart. Initial vacuum for Summa #A7525 = -29.7" using separate gauge #MAN316M-985. Initial helium conc. in shroud ~ 20.1%, added more after shroud lifted to start sampling. Average He concentration = 22.8%. PID reading from sample tube post-sample = 0.0 ppm. Confirmed post-sample Summa A7525 vac reading w/ separate gauge = 6.7", sample flow rate (using gauge #985) = 153 ml/min

Sampler: Leonard Niles

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AllWest

SOIL GAS VAPOR FIELD LOG

Project No: 1118123 **Project Name:** Edgewood SVS-2

Date: 1/3/2012 **Vapor Probe No:** SVP-14 **1L Summa Serial No:** A7518
GL Purge Summa #4712

Regulatory Agencies: SCCEHD

Contractor: Vironex/AllWest

Hole Diameter: 2" **Total Depth:** 5' **Grout/Bentonite:** 6" #2/16 sand-bottom → to top-hydrated

Probe Diameter: plastic 1/4" ID, 1/2" OD x 2" L **Line Length:** 6.5' **Purge Volume:** 500ml

Tracer Gas: Helium **Flow Regulator:** 150 (ml/min) #MAN316T-995 **Leak Test:** Pass/Fail

Laboratory Name and Number: McCampbell Analytical, TO-15 VOCs

SAMPLE COLLECTION

Start Time	Time Elapsed	Pressure	Remarks
16:01	—	-7.5"/5.7"	Manifold leak check, Summa #4712
16:05	4	-7.5"/5.7"	stopped test - passed
16:05	—	-7.5"	start purge, Summa #4712
16:08	3	-5.0"	stop purge, -2.5" = 0.5L
16:10		-27.7"	start sample He = 9.7%
16:11	1	-20"	He = 20.6"
16:12	2	-13"	He = 22.5%
16:13	3	-10"	He = 22.4% (using gauge #985)
16:13	3½	-4.7"/3.0"	He = 22.2%, sample flow rate = 225 ml/min

Remarks: Initial vacuum Summa #A7518 = -28.5" using separate gauge MAN 316M-985. Initial helium conc in shroud ≥ 20% fell to <10% when shroud lifted to start sample injected more to bring He > 20%. Avg He conc. = 19.5%. Manifold MAN 316T-995 vac gauges off by ≈ 1.8" from each other. Final Summa A7518 vac reading = -4.9" from gauge MAN316M-985. PID = 0 ppm in sample tube, post-sample. Flow rate for sample = ~~219~~ 225 ml/min (using #995 gauges - inaccurate), or 225 ml/min (using #985 gauge - accurate?) Elapsed time questionable?

Sampler: Leonard Niles

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AllWest

SOIL GAS VAPOR FIELD LOG

Project No: 11181.23 **Project Name:** Edgewood SVS-2

Date: 1/3/2012 **Vapor Probe No:** SVP-15 1L Summa **Serial No:** A7524 6L Purge Summa #4712

Regulatory Agencies: SCCEHD

Contractor: Vironex/Allwest

Hole Diameter: 2" **Total Depth:** 5' **Grout/Bentonite:** 6" #2/16 sand-bottom → to top - hydrated

Probe Diameter: plastic 1/4" ID, 1/2" OD x 2' L **Line Length:** 6.5' MAN316T-998 **Purge Volume:** >500 ml

Tracer Gas: helium **Flow Regulator:** 150 (ml/min) **Leak Test:** Pass/Fail

Laboratory Name and Number: McCampbell TO-15, VOCs

SAMPLE COLLECTION

Start Time	Time Elapsed	Pressure	Remarks
16:40	—	-3.2"/-3.4"	Start leak check, summa #4712
16:43	3	-3.2"/-3.4"	stop leak check - passed
16:43	—	-3.2"/-3.4"	start purge, summa #4712
16:47	4	0" (popped)	stop purge, -2.5" = 0.5L
16:50	—	-26.6"	start sample, He <10% in shroud
16:52	2	-20"	He = 18.9 %
16:53	3	-15"	He = 22.3 %
16:53	3 1/2	-10"	He = 22.2 %
16:55	5	-4.6" *	He = 22.2 % stopped sample

Remarks: Initial vacuum Summa #A7524 = -28.8" using separate gauge #MAN316M-985. Initial helium conc ≈ 20% in shroud dropped to <10% when lifted to start sample, injected more. Final vacuum = -6.9" using gauge # MAN316M-985. *Manifold gauges #MAN316T-998 not accurate. Sample flow rate = 143 ml/min using gauge # 998 (not accurate), or 146 ml/min using gauge # 985 (accurate). Avg. He conc. = 19.1%

Sampler: Leonard Niles

Appendix C

McCampbell Analytical, Inc.
"When Quality Counts"

1534 Willow Pass Road, Pittsburg, CA 94565-1701
Toll Free Telephone: (877) 252-9262 / Fax: (925) 252-9269
http://www.mccampbell.com / E-mail: main@mccampbell.com

Analytical Report

All West Environmental, Inc	Client Project ID: #11163.23; Edgewood SC	Date Sampled: 11/17/11
		Date Received: 11/18/11
530 Howard Street, Ste. 300	Client Contact: Christopher Houlihan	Date Reported: 11/22/11
San Francisco, CA 94105	Client P.O.:	Date Completed: 11/23/11

WorkOrder: 1111661

November 23, 2011

Dear Christopher:

Enclosed within are:

1) The results of the **7** analyzed samples from your project: **#11163.23; Edgewood SC,**
2) A QC report for the above samples,
3) A copy of the chain of custody, and
4) An invoice for analytical services.

All analyses were completed satisfactorily and all QC samples were found to be within our control limits.

If you have any questions or concerns, please feel free to give me a call. Thank you for choosing McCampbell Analytical Laboratories for your analytical needs.

Best regards,

Angela Rydelius
Laboratory Manager
McCampbell Analytical, Inc.

The analytical results relate only to the items tested.

1111661

McCAMPBELL ANALYTICAL INC.
1534 WILLOW PASS ROAD / PITTSBURG, CA 94565-1701
Website: www.mccampbell.com / Email: main@mccampbell.com
Telephone: (877) 252-9262 / Fax: (925) 252-9269

CHAIN OF CUSTODY RECORD

TURN AROUND TIME ☐ RUSH ☐ 24 HR ☐ 48 HR ☐ 72 HR ☑ 5 DAY

EDF Required? Coelt (Normal) No **Write On (DW)** No

Lab Use Only

Pressurized By	Date	Pressurization Gas	
		N2	He

Report To: Christopher Houlihan	**Bill To:** Darlene Torio
Company: AllWest	
530 Howard St. #300	
San Francisco, CA 94105	**E-Mail:**
Tele: (415) 391-2510	**Fax:** (415) 391-2008
Project #: 1163.23	**Project Name:** Edgewood SC
Project Location: 2103-2125 St. Francis Dr. Palo Alto, CA	
Sampler Signature: C. Houlihan	

Helium Shroud SN#: CONBOX-962, AllWest 1

Other:

Notes: Do not analyze SVP-5 for Helium. Reused manifolds were purged with Helium before re-use.

Field Sample ID (Location)	Collection Date	Collection Time	Canister SN#	Manifold / Sampler Kit SN#	Analysis Requested	Indoor Air	Soil Gas	Canister Pressure/Vacuum Initial	Canister Pressure/Vacuum Final	Canister Pressure/Vacuum Receipt	Canister Pressure/Vacuum Final (psi)
SVP-1	11/17/11	1029	6408	775	VOCs TO-15, He ASTMD-1946		✓	30"	5.4"		
SVP-6	"	1129	A7509	774	VOCs TO-15, He ASTMD 1946		✓	28.0"	4.5"		
SVP-5	"	1236	6302	780	VOCs TO-15		✓	30"	5"		
SVP-4	"	1318	6169	778	VOCs TO-15, He ASTMD-1946		✓	30"	5"		
SVP-3	"	1428	6420	779	"		✓	28.8"	3.1"		
SVP-2	"	1507	6306	776	"		✓	29.5"	5.0"		
SVP-7	↓	1549	A7518	776	↓		✓	28.9"	5"		
					C. Houlihan						

	Date:	Time:	Received By:
Relinquished By: C. Houlihan	11/18/11	250	
Relinquished By:	11/18/11	440	
Relinquished By:	**Date:**	**Time:**	**Received By:**

Temp (°C): n/a Work Order #: 1111661

Equipment Condition: good

Shipped Via: Courier (Golden Bullet)

McCampbell Analytical, Inc.
1534 Willow Pass Rd
Pittsburg, CA 94565-1701
(925) 252-9262

CHAIN-OF-CUSTODY RECORD

WorkOrder: 1111661 **ClientCode: AWE**

☐ WaterTrax ☐ WriteOn ☐ EDF ☐ Excel ☐ Fax ☑ Email ☐ HardCopy ☐ ThirdParty ☐ J-flag

Report to:
Christopher Houlihan
All West Environmental, Inc
530 Howard Street, Ste. 300
San Francisco, CA 94105
(415) 391-2510 FAX: (415) 391-2008

Email: choulihan@allwest1.com
cc:
PO:
ProjectNo: #11163.23; Edgewood SC

Bill to:
Darlene Torio
All West Environmental, Inc
530 Howard Street, Ste.300
San Francisco, CA 94105
darlene@allwest1.com

Requested TAT: 5 days

Date Received: **11/18/2011**
Date Printed: **11/18/2011**

Lab ID	Client ID	Matrix	Collection Date	Hold	Requested Tests (See legend below)											
					1	2	3	4	5	6	7	8	9	10	11	12
1111661-001	SVP-1	Soil Gas	11/17/2011 10:29	☐	A	A										
1111661-002	SVP-6	Soil Gas	11/17/2011 11:29	☐	A	A										
1111661-003	SVP-5	Soil Gas	11/17/2011 12:36	☐		A										
1111661-004	SVP-4	Soil Gas	11/17/2011 13:18	☐	A	A										
1111661-005	SVP-3	Soil Gas	11/17/2011 14:28	☐	A	A										
1111661-006	SVP-2	Soil Gas	11/17/2011 15:07	☐	A	A										
1111661-007	SVP-7	Soil Gas	11/17/2011 15:49	☐	A	A										

Test Legend:

1	HELIUM_LC_SOILGAS(%)	2	TO15_SOIL(UG/M3)	3		4		5	
6		7		8		9		10	
11		12							

The following SampIDs: 001A, 002A, 003A, 004A, 005A, 006A, 007A contain testgroup.

Prepared by: Melissa Valles

Comments:

NOTE: Soil samples are discarded 60 days after results are reported unless other arrangements are made (Water samples are 30 days).
Hazardous samples will be returned to client or disposed of at client expense.

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Sample Receipt Checklist

Client Name: **All West Environmental, Inc**

Date and Time Received: **11/18/2011 5:44:18 PM**

Project Name: **#11163.23; Edgewood SC**

Checklist completed and reviewed by: Melissa Valles

WorkOrder N°: **1111661** Matrix: Soil Gas

Carrier: Courier

Chain of Custody (COC) Information

Chain of custody present?	Yes ☑	No ☐
Chain of custody signed when relinquished and received?	Yes ☑	No ☐
Chain of custody agrees with sample labels?	Yes ☑	No ☐
Sample IDs noted by Client on COC?	Yes ☑	No ☐
Date and Time of collection noted by Client on COC?	Yes ☑	No ☐
Sampler's name noted on COC?	Yes ☑	No ☐

Sample Receipt Information

Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	NA ☑
Shipping container/cooler in good condition?	Yes ☑	No ☐	
Samples in proper containers/bottles?	Yes ☑	No ☐	
Sample containers intact?	Yes ☑	No ☐	
Sufficient sample volume for indicated test?	Yes ☑	No ☐	

Sample Preservation and Hold Time (HT) Information

All samples received within holding time?	Yes ☑	No ☐	
Container/Temp Blank temperature	Cooler Temp:		NA ☑
Water - VOA vials have zero headspace / no bubbles?	Yes ☐	No ☐	No VOA vials submitted ☑
Sample labels checked for correct preservation?	Yes ☑	No ☐	
Metal - pH acceptable upon receipt (pH<2)?	Yes ☐	No ☐	NA ☑
Samples Received on Ice?	Yes ☐	No ☑	

** NOTE: If the "No" box is checked, see comments below.*

Client contacted: Date contacted: Contacted by:

Comments:

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All West Environmental, Inc	Client Project ID: #11163.23; Edgewood SC	Date Sampled: 11/17/11
530 Howard Street, Ste. 300		Date Received: 11/18/11
	Client Contact: Christopher Houlihan	Date Extracted: 11/21/11
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 11/21/11

Helium*

Extraction method: ASTM D 1946-90 Analytical methods: ASTM D 1946-90 Work Order: 1111661

Lab ID	Client ID	Matrix	Initial Pressure	Final Pressure	Helium	DF	% SS	Comments
001A	SVP-1	Soil Gas	1.00	1.00	0.042	1	N/A	
002A	SVP-6	Soil Gas	12.97	25.72	0.012	1	N/A	
004A	SVP-4	Soil Gas	12.51	24.94	0.55	1	N/A	
005A	SVP-3	Soil Gas	12.87	25.66	0.0079	1	N/A	
006A	SVP-2	Soil Gas	13.00	25.91	6.4	1	N/A	
007A	SVP-7	Soil Gas	12.39	24.68	0.12	1	N/A	

Reporting Limit for DF =1; ND means not detected at or above the reporting limit	W	psia	psia	NA	NA
	SoilGas	psia	psia	0.002	%

* vapor samples are reported in %.

%SS = Percent Recovery of Surrogate Standard

DF = Dilution Factor

DHS ELAP Certification 1644

Angela Rydelius, Lab Manager

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All West Environmental, Inc	Client Project ID: #11163.23; Edgewood SC	Date Sampled: 11/17/11
530 Howard Street, Ste. 300		Date Received: 11/18/11
	Client Contact: Christopher Houlihan	Date Extracted: 11/22/11
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 11/22/11

Volatile Organics by P&T and GC/MS in µg/m³*

Extraction method: SW5030B | Analytical methods: SW8260B | Work Order: 1111661

Lab ID	Client ID	Matrix	Initial Pressure	Final Pressure	Tetrachloroethene	DF	% SS	Comments
001A	SVP-1	Soil Gas	12.91	25.72	17,000	1	109	

Reporting Limit for DF =1; ND means not detected at or above the reporting limit	W	psia	psia	NA	NA
	SoilGas	psia	psia	500	µg/m³

*soil vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or coelutes with another peak; &) low surrogate due to matrix interference.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

DHS ELAP Certification 1644

Angela Rydelius, Lab Manager

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		Date Received: 11/18/11
530 Howard Street, Ste. 300	Client Contact: Christopher Houlihan	Date Extracted: 11/19/11
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 11/19/11

Leak Check Compound*

Extraction method: TO15 Analytical methods: TO15 Work Order: 1111661

Lab ID	Client ID	Matrix	Initial Pressure	Final Pressure	Isopropyl Alcohol	DF	% SS	Comments
001A	SVP-1	Soil Gas	12.91	25.72	ND	1	N/A	
002A	SVP-6	Soil Gas	12.00	23.91	ND	1	N/A	
003A	SVP-5	Soil Gas	12.51	24.94	ND	1	N/A	
004A	SVP-4	Soil Gas	12.57	25.66	ND	1	N/A	
005A	SVP-3	Soil Gas	13.00	25.91	ND	1	N/A	
006A	SVP-2	Soil Gas	12.39	24.68	ND	1	N/A	
007A	SVP-7	Soil Gas	12.24	24.38	ND	1	N/A	

Reporting Limit for DF =1; ND means not detected at or above the reporting limit	W	psia	psia	NA	NA
	SoilGas	psia	psia	50	µg/m³

* leak check compound is reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

The IPA reference is:

DTSC, Advisory-Active Soil Gas Investigations, March 3rd, 2010, page 24, section 2.4:

"The laboratory reports should quantify and annotate all detections of the leak check compound at the reporting limit of the target analytes."

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

DHS ELAP Certification 1644

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All West Environmental, Inc	Client Project ID: #11163.23; Edgewood SC	Date Sampled: 11/17/11
		Date Received: 11/18/11
530 Howard Street, Ste. 300	Client Contact: Christopher Houlihan	Date Extracted: 11/19/11
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 11/19/11

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1111661

Lab ID	1111661-001A	Initial Pressure (psia)	12.91
Client ID	SVP-1	Final Pressure (psia)	25.72
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	7.0	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	110	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	ND	1.0	96	Ethyl acetate	ND	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	11	1.0	8.8
4-Ethyltoluene	ND	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrahydrofuran	ND	1.0	6.0	Toluene	66	1.0	7.7
1,2,4-Trichlorobenzene	ND	1.0	15	1,1,1-Trichloroethane	ND	1.0	11
1,1,2-Trichloroethane	ND	1.0	11	Trichloroethene	520	1.0	11
Trichlorofluoromethane	ND	1.0	11	1,2,4-Trimethylbenzene	12	1.0	10
1,3,5-Trimethylbenzene	ND	1.0	10	Vinyl Acetate	ND	1.0	180
Vinyl Chloride	ND	1.0	5.2	Xylenes, Total	46	1.0	27

Surrogate Recoveries (%)

%SS1:	106	%SS2:	101
%SS3:	98		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

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All West Environmental, Inc	Client Project ID: #11163.23; Edgewood SC	Date Sampled: 11/17/11
		Date Received: 11/18/11
530 Howard Street, Ste. 300	Client Contact: Christopher Houlihan	Date Extracted: 11/19/11
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 11/19/11

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1111661

Lab ID	1111661-002A	Initial Pressure (psia)	12.00
Client ID	SVP-6	Final Pressure (psia)	23.91
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	ND	1.0	96	Ethyl acetate	ND	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	ND	1.0	8.8
4-Ethyltoluene	ND	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	ND	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	ND	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	ND	1.0	10	1,3,5-Trimethylbenzene	ND	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	ND	1.0	27				

Surrogate Recoveries (%)

%SS1:	105	%SS2:	102
%SS3:	101		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

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		Date Received: 11/18/11
530 Howard Street, Ste. 300	Client Contact: Christopher Houlihan	Date Extracted: 11/19/11
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 11/19/11

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1111661

Lab ID	1111661-003A	Initial Pressure (psia)	12.51
Client ID	SVP-5	Final Pressure (psia)	24.94
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	ND	1.0	96	Ethyl acetate	ND	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	ND	1.0	8.8
4-Ethyltoluene	ND	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	ND	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	15	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	ND	1.0	10	1,3,5-Trimethylbenzene	ND	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	ND	1.0	27				

Surrogate Recoveries (%)

%SS1:	108	%SS2:	102
%SS3:	102		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

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http://www.mccampbell.com / E-mail: main@mccampbell.com

All West Environmental, Inc	Client Project ID: #11163.23; Edgewood SC	Date Sampled: 11/17/11
		Date Received: 11/18/11
530 Howard Street, Ste. 300	Client Contact: Christopher Houlihan	Date Extracted: 11/19/11
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 11/19/11

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1111661

Lab ID	1111661-004A	Initial Pressure (psia)	12.57
Client ID	SVP-4	Final Pressure (psia)	25.66
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	ND	1.0	96	Ethyl acetate	ND	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	ND	1.0	8.8
4-Ethyltoluene	ND	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	ND	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	ND	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	11	1.0	10	1,3,5-Trimethylbenzene	ND	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	ND	1.0	27				

Surrogate Recoveries (%)

%SS1:	108	%SS2:	103
%SS3:	105		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
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All West Environmental, Inc	Client Project ID: #11163.23; Edgewood SC	Date Sampled: 11/17/11
		Date Received: 11/18/11
530 Howard Street, Ste. 300	Client Contact: Christopher Houlihan	Date Extracted: 11/19/11
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 11/19/11

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1111661

Lab ID	1111661-005A	Initial Pressure (psia)	13.00
Client ID	SVP-3	Final Pressure (psia)	25.91
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	ND	1.0	96	Ethyl acetate	ND	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	ND	1.0	8.8
4-Ethyltoluene	ND	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	ND	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	ND	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	12	1.0	10	1,3,5-Trimethylbenzene	ND	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	ND	1.0	27				

Surrogate Recoveries (%)

%SS1:	108	%SS2:	101
%SS3:	100		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
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All West Environmental, Inc	Client Project ID: #11163.23; Edgewood SC	Date Sampled: 11/17/11
		Date Received: 11/18/11
530 Howard Street, Ste. 300	Client Contact: Christopher Houlihan	Date Extracted: 11/19/11
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 11/19/11

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1111661

Lab ID	1111661-006A	Initial Pressure (psia)	12.39
Client ID	SVP-2	Final Pressure (psia)	24.68
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	ND	1.0	96	Ethyl acetate	ND	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	ND	1.0	8.8
4-Ethyltoluene	ND	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	ND	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	8.6	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	ND	1.0	10	1,3,5-Trimethylbenzene	ND	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	ND	1.0	27				

Surrogate Recoveries (%)

%SS1:	107	%SS2:	103
%SS3:	92		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
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All West Environmental, Inc	Client Project ID: #11163.23; Edgewood SC	Date Sampled: 11/17/11
		Date Received: 11/18/11
530 Howard Street, Ste. 300	Client Contact: Christopher Houlihan	Date Extracted: 11/19/11
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 11/19/11

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1111661

Lab ID	1111661-007A	Initial Pressure (psia)	12.24
Client ID	SVP-7	Final Pressure (psia)	24.38
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	ND	1.0	96	Ethyl acetate	ND	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	47	1.0	8.8
4-Ethyltoluene	11	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	ND	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	21	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	18	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	25	1.0	10	1,3,5-Trimethylbenzene	ND	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	310	1.0	27				

Surrogate Recoveries (%)

%SS1:	109	%SS2:	104
%SS3:	116		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
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QC SUMMARY REPORT FOR ASTM D 1946-90

W.O. Sample Matrix: Soilgas QC Matrix: Soilgas WorkOrder: 1111661

EPA Method: ASTM D 1946-90		Extraction: ASTM D 1946-90			Acceptance Criteria (%)	BatchID: 62918
Analyte	Spiked	LCS	LCSD	LCS-LCSD		
	%	% Rec.	% Rec.	% RPD	LCS / LCSD	RPD
Helium	0.010	101	102	0.863	70 - 130	20

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:

NONE

BATCH 62918 SUMMARY

Lab ID	Date Sampled	Date Extracted	Date Analyzed	Lab ID	Date Sampled	Date Extracted	Date Analyzed
1111661-001A	11/17/11 10:29 AM	11/21/11	11/21/11 1:41 PM	1111661-002A	11/17/11 11:29 AM	11/21/11	11/21/11 1:53 PM
1111661-004A	11/17/11 1:18 PM	11/21/11	11/21/11 2:18 PM	1111661-005A	11/17/11 2:28 PM	11/21/11	11/21/11 2:31 PM
1111661-006A	11/17/11 3:07 PM	11/21/11	11/21/11 2:43 PM	1111661-007A	11/17/11 3:49 PM	11/21/11	11/21/11 2:56 PM

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

MS / MSD spike recoveries and / or %RPD may fall outside of laboratory acceptance criteria due to one or more of the following reasons: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) the spiked sample's matrix interferes with the spike recovery.

N/A = not enough sample to perform matrix spike and matrix spike duplicate.

NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

DHS ELAP Certification 1644

QA/QC Officer

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http://www.mccampbell.com / E-mail: main@mccampbell.com

QC SUMMARY REPORT FOR SW8260B

W.O. Sample Matrix: Soilgas | QC Matrix: Water | BatchID: 63001 | WorkOrder: 1111661

EPA Method: SW8260B | **Extraction: SW5030B** | **Spiked Sample ID: N/A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	LCSD	LCS-LCSD	Acceptance Criteria (%)			
	µg/L	µg/L	% Rec.	% Rec.	% RPD	% Rec.	% Rec.	% RPD	MS / MSD	RPD	LCS/LCSD	RPD
tert-Amyl methyl ether (TAME)	N/A	10	N/A	N/A	N/A	86.2	89.1	3.35	N/A	N/A	70 - 130	30
Benzene	N/A	10	N/A	N/A	N/A	96.3	98.9	2.59	N/A	N/A	70 - 130	30
t-Butyl alcohol (TBA)	N/A	50	N/A	N/A	N/A	96.8	99.3	2.58	N/A	N/A	70 - 130	30
Chlorobenzene	N/A	10	N/A	N/A	N/A	92.5	94.2	1.80	N/A	N/A	70 - 130	30
1,2-Dibromoethane (EDB)	N/A	10	N/A	N/A	N/A	93.3	94	0.688	N/A	N/A	70 - 130	30
1,2-Dichloroethane (1,2-DCA)	N/A	10	N/A	N/A	N/A	102	105	2.77	N/A	N/A	70 - 130	30
1,1-Dichloroethene	N/A	10	N/A	N/A	N/A	105	107	1.51	N/A	N/A	70 - 130	30
Diisopropyl ether (DIPE)	N/A	10	N/A	N/A	N/A	102	105	3.42	N/A	N/A	70 - 130	30
Ethyl tert-butyl ether (ETBE)	N/A	10	N/A	N/A	N/A	88	90.1	2.29	N/A	N/A	70 - 130	30
Methyl-t-butyl ether (MTBE)	N/A	10	N/A	N/A	N/A	105	108	2.62	N/A	N/A	70 - 130	30
Toluene	N/A	10	N/A	N/A	N/A	96.1	97	0.954	N/A	N/A	70 - 130	30
Trichloroethene	N/A	10	N/A	N/A	N/A	93.1	95.6	2.62	N/A	N/A	70 - 130	30
%SS1:	N/A	25	N/A	N/A	N/A	107	108	0.500	N/A	N/A	70 - 130	30
%SS2:	N/A	25	N/A	N/A	N/A	108	107	0.627	N/A	N/A	70 - 130	30
%SS3:	N/A	2.5	N/A	N/A	N/A	97	97	0	N/A	N/A	70 - 130	30

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:
NONE

BATCH 63001 SUMMARY

Lab ID	Date Sampled	Date Extracted	Date Analyzed	Lab ID	Date Sampled	Date Extracted	Date Analyzed
1111661-001A	11/17/11 10:29 AM	11/22/11	11/22/11 3:43 PM				

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

MS / MSD spike recoveries and / or %RPD may fall outside of laboratory acceptance criteria due to one or more of the following reasons: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) the spiked sample's matrix interferes with the spike recovery.

N/A = not enough sample to perform matrix spike and matrix spike duplicate.

NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

Laboratory extraction solvents such as methylene chloride and acetone may occasionally appear in the method blank at low levels.

DHS ELAP Certification 1644

QA/QC Officer

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http://www.mccampbell.com / E-mail: main@mccampbell.com

QC SUMMARY REPORT FOR TO15

W.O. Sample Matrix: Soilgas | QC Matrix: Soilgas | BatchID: 62839 | WorkOrder: 1111661

EPA Method: TO15 | **Extraction: TO15** | **Spiked Sample ID: N/A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	LCSD	LCS-LCSD	Acceptance Criteria (%)			
	nL/L	nL/L	% Rec.	% Rec.	% RPD	% Rec.	% Rec.	% RPD	MS / MSD	RPD	LCS/LCSD	RPD
Acrylonitrile	N/A	25	N/A	N/A	N/A	108	109	0.471	N/A	N/A	70 - 130	30
tert-Amyl methyl ether (TAME)	N/A	25	N/A	N/A	N/A	100	100	0	N/A	N/A	70 - 130	30
Benzene	N/A	25	N/A	N/A	N/A	92.1	91.8	0.407	N/A	N/A	70 - 130	30
Benzyl chloride	N/A	25	N/A	N/A	N/A	103	95.4	7.22	N/A	N/A	70 - 130	30
Bromodichloromethane	N/A	25	N/A	N/A	N/A	95.5	94.6	0.941	N/A	N/A	70 - 130	30
Bromoform	N/A	25	N/A	N/A	N/A	102	102	0	N/A	N/A	70 - 130	30
Carbon Disulfide	N/A	25	N/A	N/A	N/A	95.6	95.1	0.470	N/A	N/A	70 - 130	30
Carbon Tetrachloride	N/A	25	N/A	N/A	N/A	100	98.8	1.36	N/A	N/A	70 - 130	30
Chlorobenzene	N/A	25	N/A	N/A	N/A	92.5	91.5	1.14	N/A	N/A	70 - 130	30
Chloroethane	N/A	25	N/A	N/A	N/A	104	105	1.25	N/A	N/A	70 - 130	30
Chloroform	N/A	25	N/A	N/A	N/A	94.4	93.5	1.00	N/A	N/A	70 - 130	30
Chloromethane	N/A	25	N/A	N/A	N/A	107	104	2.46	N/A	N/A	70 - 130	30
Dibromochloromethane	N/A	25	N/A	N/A	N/A	98.6	97.5	1.15	N/A	N/A	70 - 130	30
1,2-Dibromo-3-chloropropane	N/A	25	N/A	N/A	N/A	127	126	0.688	N/A	N/A	70 - 130	30
1,2-Dibromoethane (EDB)	N/A	25	N/A	N/A	N/A	96.2	95.2	0.976	N/A	N/A	70 - 130	30
1,3-Dichlorobenzene	N/A	25	N/A	N/A	N/A	94.6	86.1	9.45	N/A	N/A	70 - 130	30
1,4-Dichlorobenzene	N/A	25	N/A	N/A	N/A	93.6	85	9.70	N/A	N/A	70 - 130	30
Dichlorodifluoromethane	N/A	25	N/A	N/A	N/A	103	92.7	10.3	N/A	N/A	70 - 130	30
1,1-Dichloroethane	N/A	25	N/A	N/A	N/A	92.8	92.2	0.646	N/A	N/A	70 - 130	30
1,2-Dichloroethane (1,2-DCA)	N/A	25	N/A	N/A	N/A	94.4	93.5	0.945	N/A	N/A	70 - 130	30
cis-1,2-Dichloroethene	N/A	25	N/A	N/A	N/A	95.8	94.7	1.16	N/A	N/A	70 - 130	30
trans-1,2-Dichloroethene	N/A	25	N/A	N/A	N/A	94.6	93.5	1.17	N/A	N/A	70 - 130	30
1,2-Dichloropropane	N/A	25	N/A	N/A	N/A	94.6	93.3	1.40	N/A	N/A	70 - 130	30
cis-1,3-Dichloropropene	N/A	25	N/A	N/A	N/A	109	109	0	N/A	N/A	70 - 130	30
trans-1,3-Dichloropropene	N/A	25	N/A	N/A	N/A	124	123	0.879	N/A	N/A	70 - 130	30
1,2-Dichloro-1,1,2,2-tetrafluoroethane	N/A	25	N/A	N/A	N/A	92.2	91.7	0.585	N/A	N/A	70 - 130	30
Diisopropyl ether (DIPE)	N/A	25	N/A	N/A	N/A	89.6	89.8	0.203	N/A	N/A	70 - 130	30
1,4-Dioxane	N/A	25	N/A	N/A	N/A	102	102	0	N/A	N/A	70 - 130	30
Ethyl acetate	N/A	25	N/A	N/A	N/A	112	111	1.07	N/A	N/A	70 - 130	30
Ethyl tert-butyl ether (ETBE)	N/A	25	N/A	N/A	N/A	98.4	97.7	0.657	N/A	N/A	70 - 130	30
Ethylbenzene	N/A	25	N/A	N/A	N/A	91.4	89.3	2.29	N/A	N/A	70 - 130	30

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

* MS and / or MSD spike recoveries may not be near 100% or the RPDs near 0% if: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) if that specific sample matrix interferes with spike recovery.

N/A = not enough sample to perform matrix spike and matrix spike duplicate.
NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

Laboratory extraction solvents such as methylene chloride and acetone may occasionally appear in the method blank at low levels.

DHS ELAP Certification 1644

QA/QC Officer

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QC SUMMARY REPORT FOR TO15

W.O. Sample Matrix: Soilgas | QC Matrix: Soilgas | BatchID: 62839 | WorkOrder: 1111661

EPA Method: TO15 | **Extraction: TO15** | **Spiked Sample ID: N/A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	LCSD	LCS-LCSD	Acceptance Criteria (%)			
	nL/L	nL/L	% Rec.	% Rec.	% RPD	% Rec.	% Rec.	% RPD	MS / MSD	RPD	LCS/LCSD	RPD
Freon 113	N/A	25	N/A	N/A	N/A	88.1	87.9	0.186	N/A	N/A	70 - 130	30
Hexachlorobutadiene	N/A	25	N/A	N/A	N/A	106	94.6	11.0	N/A	N/A	70 - 130	30
4-Methyl-2-pentanone (MIBK)	N/A	25	N/A	N/A	N/A	120	121	0.692	N/A	N/A	70 - 130	30
Methyl-t-butyl ether (MTBE)	N/A	25	N/A	N/A	N/A	96.9	95.4	1.50	N/A	N/A	70 - 130	30
Methylene chloride	N/A	25	N/A	N/A	N/A	88.2	87.5	0.781	N/A	N/A	70 - 130	30
Naphthalene	N/A	25	N/A	N/A	N/A	91.2	71.2	24.6	N/A	N/A	70 - 130	30
Styrene	N/A	25	N/A	N/A	N/A	111	104	6.87	N/A	N/A	70 - 130	30
1,1,1,2-Tetrachloroethane	N/A	25	N/A	N/A	N/A	104	104	0	N/A	N/A	70 - 130	30
1,1,2,2-Tetrachloroethane	N/A	25	N/A	N/A	N/A	97.5	96.9	0.597	N/A	N/A	70 - 130	30
Tetrachloroethene	N/A	25	N/A	N/A	N/A	89.1	88.6	0.660	N/A	N/A	70 - 130	30
Tetrahydrofuran	N/A	25	N/A	N/A	N/A	112	113	0.495	N/A	N/A	70 - 130	30
Toluene	N/A	25	N/A	N/A	N/A	93.3	92.3	0.983	N/A	N/A	70 - 130	30
1,2,4-Trichlorobenzene	N/A	25	N/A	N/A	N/A	114	91.7	21.4	N/A	N/A	70 - 130	30
1,1,1-Trichloroethane	N/A	25	N/A	N/A	N/A	94.8	93.3	1.54	N/A	N/A	70 - 130	30
1,1,2-Trichloroethane	N/A	25	N/A	N/A	N/A	93.9	93.6	0.224	N/A	N/A	70 - 130	30
Trichloroethene	N/A	25	N/A	N/A	N/A	89.6	88.8	0.950	N/A	N/A	70 - 130	30
1,2,4-Trimethylbenzene	N/A	25	N/A	N/A	N/A	108	94.2	13.6	N/A	N/A	70 - 130	30
1,3,5-Trimethylbenzene	N/A	25	N/A	N/A	N/A	102	90.8	11.9	N/A	N/A	70 - 130	30
Vinyl Chloride	N/A	25	N/A	N/A	N/A	112	107	4.63	N/A	N/A	70 - 130	30
%SS1:	N/A	500	N/A	N/A	N/A	97	97	0	N/A	N/A	70 - 130	30
%SS2:	N/A	500	N/A	N/A	N/A	101	100	0.881	N/A	N/A	70 - 130	30
%SS3:	N/A	500	N/A	N/A	N/A	103	96	7.01	N/A	N/A	70 - 130	30

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:
NONE

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

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QC SUMMARY REPORT FOR TO15

W.O. Sample Matrix: Soilgas | QC Matrix: Soilgas | BatchID: 62839 | WorkOrder: 1111661

EPA Method: TO15 | **Extraction: TO15** | **Spiked Sample ID: N/A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	LCSD	LCS-LCSD	Acceptance Criteria (%)			
	nL/L	nL/L	% Rec.	% Rec.	% RPD	% Rec.	% Rec.	% RPD	MS / MSD	RPD	LCS/LCSD	RPD

BATCH 62839 SUMMARY

Lab ID	Date Sampled	Date Extracted	Date Analyzed	Lab ID	Date Sampled	Date Extracted	Date Analyzed
1111661-001A	11/17/11 10:29 AM	11/19/11	11/19/11 2:23 AM	1111661-001A	11/17/11 10:29 AM	11/19/11	11/19/11 2:23 AM
1111661-002A	11/17/11 11:29 AM	11/19/11	11/19/11 3:05 AM	1111661-002A	11/17/11 11:29 AM	11/19/11	11/19/11 3:05 AM
1111661-003A	11/17/11 12:36 PM	11/19/11	11/19/11 3:49 AM	1111661-003A	11/17/11 12:36 PM	11/19/11	11/19/11 3:49 AM
1111661-004A	11/17/11 1:18 PM	11/19/11	11/19/11 4:34 AM	1111661-004A	11/17/11 1:18 PM	11/19/11	11/19/11 4:34 AM
1111661-005A	11/17/11 2:28 PM	11/19/11	11/19/11 5:19 AM	1111661-005A	11/17/11 2:28 PM	11/19/11	11/19/11 5:19 AM
1111661-006A	11/17/11 3:07 PM	11/19/11	11/19/11 6:04 AM	1111661-006A	11/17/11 3:07 PM	11/19/11	11/19/11 6:04 AM
1111661-007A	11/17/11 3:49 PM	11/19/11	11/19/11 6:50 AM	1111661-007A	11/17/11 3:49 PM	11/19/11	11/19/11 6:50 AM

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

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Analytical Report

All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
		Date Received: 01/04/12
530 Howard Street, Ste. 300	Client Contact: Leonard Niles	Date Reported: 01/11/12
San Francisco, CA 94105	Client P.O.:	Date Completed: 01/11/12

WorkOrder: 1201050

January 11, 2012

Dear Leonard:

Enclosed within are:

1) The results of the **8** analyzed samples from your project: **#11181.23; Edgewood SVS-2,**
2) QC data for the above samples, and
3) A copy of the chain of custody.

All analyses were completed satisfactorily and all QC samples were found to be within our control limits.

If you have any questions or concerns, please feel free to give me a call. Thank you for choosing McCampbell Analytical Laboratories for your analytical needs.

Best regards,

Angela Rydelius
Laboratory Manager
McCampbell Analytical, Inc.

The analytical results relate only to the items tested.

1201050

McCAMPBELL ANALYTICAL INC.
1534 WILLOW PASS ROAD / PITTSBURG, CA 94565-1701
Website: www.mccampbell.com / Email: main@mccampbell.com
Telephone: (877) 252-9262 / Fax: (925) 252-9269

CHAIN OF CUSTODY RECORD

TURN AROUND TIME: ☐ RUSH ☐ 24 HR ☐ 48 HR ☐ 72 HR ☑ 5 DAY

EDF Required? Coelt (Normal) (No) Write On (DW) No

Report To: Leonard Niles   Bill To: Darlene Torio

Company: AllWest Environmental, Inc.

530 Howard Street, Suite 300

San Francisco, CA 94105   E-Mail: Leonard@allwest1.com Darlene@allwest1.com

Tele: (415) 391-2510   Fax: (415) 391-2008

Project #: 11181.23   Project Name: Edgewood SVS-2

Project Location: Edgewood Plaza, Palo Alto, CA

Sampler Signature: Leonard Niles

Lab Use Only

Pressurized By	Date	Pressurization Gas N2	Pressurization Gas He

Helium Shroud SN#:

Other:

Notes: Initial vacuums all measured with gauge #MAN316M-985; final vacuums mostly with manifold gauges (some with #985)

Field Sample ID (Location)	Collection Date	Collection Time	Canister SN#	Manifold / Sampler Kit SN#	Analysis Requested	Indoor Air	Soil Gas	Canister Pressure/Vacuum Initial "Hg	Final "Hg	Receipt	Final (psi)
SVP-8	1/3/12	11:09	1461	MAN316-826	VOCs-TO-15		X	-27.5"	-4.5"		
SVP-9		12:05	6204	MAN316-718	VOCs-TO-15		X	-28.9"	-4.5"		
SVP-10		12:55	6207	MAN316-819	VOCs-TO-15		X	-28.9"	-5.1"		
SVP-11		13:48	A7509	MAN316T-776	VOCs-TO-15		X	-29.4"	-4.7"		
SVP-12		14:35	6302	MAN316T-993	VOCs-TO-15		X	-28.9"	-4.3"		
SVP-13		15:33	A7525	MAN316T-994	VOCs-TO-15		X	-29.1"	-6.7"		
SVP-14		16:13	A7518	MAN316T-995	VOCs-TO-15		X	-28.5"	-4.9"		
SVP-15	↓	16:55	A7524	MAN316T-998	VOCs-TO-15		X	-28.8"	-6.9"		

Relinquished By:	Date:	Time:	Received By:
Leonard Niles	1/4/12	1315	
	1/4/12	1530	Ike Vall

Temp (°C): n/a   Work Order #: 1201050

Equipment Condition: broke inline filter connector on MAN316M-985

Shipped Via: R.P. (MAI Carrier)

McCampbell Analytical, Inc.
1534 Willow Pass Rd
Pittsburg, CA 94565-1701
(925) 252-9262

CHAIN-OF-CUSTODY RECORD

WorkOrder: 1201050 **ClientCode: AWE**

☐ WaterTrax ☐ WriteOn ☐ EDF ☐ Excel ☐ Fax ☑ Email ☐ HardCopy ☐ ThirdParty ☐ J-flag

Report to:
Leonard Niles
All West Environmental, Inc
530 Howard Street, Ste. 300
San Francisco, CA 94105
(415) 391-2510 FAX: (415) 391-2008

Email: Leonard@allwest1.com
cc:
PO:
ProjectNo: #11181.23; Edgewood SVS-2

Bill to:
Darlene Torio
All West Environmental, Inc
530 Howard Street, Ste.300
San Francisco, CA 94105
darlene@allwest1.com

Requested TAT: **5 days**

Date Received: **01/04/2012**
Date Printed: **01/04/2012**

Lab ID	Client ID	Matrix	Collection Date	Hold	Requested Tests (See legend below)											
					1	2	3	4	5	6	7	8	9	10	11	12
1201050-001	SVP-8	Soil Gas	1/3/2012 11:09	☐	A											
1201050-002	SVP-9	Soil Gas	1/3/2012 12:05	☐	A											
1201050-003	SVP-10	Soil Gas	1/3/2012 12:55	☐	A											
1201050-004	SVP-11	Soil Gas	1/3/2012 13:48	☐	A											
1201050-005	SVP-12	Soil Gas	1/3/2012 14:35	☐	A											
1201050-006	SVP-13	Soil Gas	1/3/2012 15:33	☐	A											
1201050-007	SVP-14	Soil Gas	1/3/2012 16:13	☐	A											
1201050-008	SVP-15	Soil Gas	1/3/2012 16:55	☐	A											

Test Legend:

1	TO15_SOIL(UG/M3)	2		3		4		5	
6		7		8		9		10	
11		12							

The following SampIDs: 001A, 002A, 003A, 004A, 005A, 006A, 007A, 008A contain testgroup.

Prepared by: Melissa Valles

Comments:

NOTE: Soil samples are discarded 60 days after results are reported unless other arrangements are made (Water samples are 30 days).
Hazardous samples will be returned to client or disposed of at client expense.

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Sample Receipt Checklist

Client Name: **All West Environmental, Inc**

Date and Time Received: **1/4/2012 4:48:24 PM**

Project Name: **#11181.23; Edgewood SVS-2**

Checklist completed and reviewed by: Melissa Valles

WorkOrder N°: **1201050** Matrix: Soil Gas

Carrier: Rob Pringle (MAI Courier)

Chain of Custody (COC) Information

Chain of custody present?	Yes ☑	No ☐
Chain of custody signed when relinquished and received?	Yes ☑	No ☐
Chain of custody agrees with sample labels?	Yes ☑	No ☐
Sample IDs noted by Client on COC?	Yes ☑	No ☐
Date and Time of collection noted by Client on COC?	Yes ☑	No ☐
Sampler's name noted on COC?	Yes ☑	No ☐

Sample Receipt Information

Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	NA ☑
Shipping container/cooler in good condition?	Yes ☑	No ☐	
Samples in proper containers/bottles?	Yes ☑	No ☐	
Sample containers intact?	Yes ☑	No ☐	
Sufficient sample volume for indicated test?	Yes ☑	No ☐	

Sample Preservation and Hold Time (HT) Information

All samples received within holding time?	Yes ☑	No ☐	
Container/Temp Blank temperature	Cooler Temp:		NA ☑
Water - VOA vials have zero headspace / no bubbles?	Yes ☐	No ☐	No VOA vials submitted ☑
Sample labels checked for correct preservation?	Yes ☑	No ☐	
Metal - pH acceptable upon receipt (pH<2)?	Yes ☐	No ☐	NA ☑
Samples Received on Ice?	Yes ☐	No ☑	

** NOTE: If the "No" box is checked, see comments below.*

Comments:

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All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
530 Howard Street, Ste. 300		Date Received: 01/04/12
	Client Contact: Leonard Niles	Date Extracted: 01/05/12-01/07/12
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 01/05/12-01/07/12

Leak Check Compound*

Extraction method: TO15 Analytical methods: TO15 Work Order: 1201050

Lab ID	Client ID	Matrix	Initial Pressure	Final Pressure	Isopropyl Alcohol	DF	% SS	Comments
001A	SVP-8	Soil Gas	13.18	26.28	ND	1	N/A	
002A	SVP-9	Soil Gas	13.04	25.98	ND	1	N/A	
003A	SVP-10	Soil Gas	12.45	24.82	ND	1	N/A	
004A	SVP-11	Soil Gas	13.14	26.18	ND	1	N/A	
005A	SVP-12	Soil Gas	13.28	26.48	ND	1	N/A	
006A	SVP-13	Soil Gas	11.92	23.74	88	1	N/A	
007A	SVP-14	Soil Gas	12.68	25.30	ND	1	N/A	
008A	SVP-15	Soil Gas	11.74	23.38	110	1	N/A	

Reporting Limit for DF =1; ND means not detected at or above the reporting limit	W	psia	psia	NA	NA
	SoilGas	psia	psia	50	µg/m³

* leak check compound is reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

The IPA reference is:

DTSC, Advisory-Active Soil Gas Investigations, March 3rd, 2010, page 24, section 2.4:

"The laboratory reports should quantify and annotate all detections of the leak check compound at the reporting limit of the target analytes."

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

DHS ELAP Certification 1644

Angela Rydelius, Lab Manager

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All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
		Date Received: 01/04/12
530 Howard Street, Ste. 300	Client Contact: Leonard Niles	Date Extracted: 01/05/12
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 01/05/12

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1201050

Lab ID	1201050-001A	Initial Pressure (psia)	13.18
Client ID	SVP-8	Final Pressure (psia)	26.28
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	59	1.0	96	Ethyl acetate	25	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	18	1.0	8.8
4-Ethyltoluene	12	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	ND	1.0	14	Tetrahydrofuran	7.0	1.0	6.0
Toluene	28	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	59	1.0	10	1,3,5-Trimethylbenzene	ND	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	110	1.0	27				

Surrogate Recoveries (%)

%SS1:	110	%SS2:	103
%SS3:	100		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

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All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
		Date Received: 01/04/12
530 Howard Street, Ste. 300	Client Contact: Leonard Niles	Date Extracted: 01/05/12
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 01/05/12

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1201050

Lab ID	1201050-002A	Initial Pressure (psia)	13.04
Client ID	SVP-9	Final Pressure (psia)	25.98
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	170	1.0	96	Ethyl acetate	220	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	25	1.0	8.8
4-Ethyltoluene	21	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	41	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	38	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	82	1.0	10	1,3,5-Trimethylbenzene	17	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	180	1.0	27				

Surrogate Recoveries (%)

%SS1:	112	%SS2:	101
%SS3:	111		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

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All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
		Date Received: 01/04/12
530 Howard Street, Ste. 300	Client Contact: Leonard Niles	Date Extracted: 01/06/12
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 01/06/12

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1201050

Lab ID	1201050-003A	Initial Pressure (psia)	12.45
Client ID	SVP-10	Final Pressure (psia)	24.82
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	ND	1.0	96	Ethyl acetate	ND	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	47	1.0	8.8
4-Ethyltoluene	30	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	88	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	74	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	110	1.0	10	1,3,5-Trimethylbenzene	37	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	300	1.0	27				

Surrogate Recoveries (%)

%SS1:	109	%SS2:	102
%SS3:	109		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

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All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
		Date Received: 01/04/12
530 Howard Street, Ste. 300	Client Contact: Leonard Niles	Date Extracted: 01/06/12
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 01/06/12

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1201050

Lab ID	1201050-004A	Initial Pressure (psia)	13.14
Client ID	SVP-11	Final Pressure (psia)	26.18
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	210	1.0	96	Ethyl acetate	27	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	12	1.0	8.8
4-Ethyltoluene	ND	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	ND	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	13	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	38	1.0	10	1,3,5-Trimethylbenzene	ND	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	72	1.0	27				

Surrogate Recoveries (%)

%SS1:	111	%SS2:	103
%SS3:	96		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

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http://www.mccampbell.com / E-mail: main@mccampbell.com

All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
		Date Received: 01/04/12
530 Howard Street, Ste. 300	Client Contact: Leonard Niles	Date Extracted: 01/06/12
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 01/06/12

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1201050

Lab ID	1201050-005A	Initial Pressure (psia)	13.28
Client ID	SVP-12	Final Pressure (psia)	26.48
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	96	1.0	96	Ethyl acetate	13	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	ND	1.0	8.8
4-Ethyltoluene	10	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	ND	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	ND	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	20	1.0	10	1,3,5-Trimethylbenzene	ND	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	ND	1.0	27				

Surrogate Recoveries (%)

%SS1:	112	%SS2:	103
%SS3:	84		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

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All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
		Date Received: 01/04/12
530 Howard Street, Ste. 300	Client Contact: Leonard Niles	Date Extracted: 01/06/12
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 01/06/12

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1201050

Lab ID	1201050-006A	Initial Pressure (psia)	11.92
Client ID	SVP-13	Final Pressure (psia)	23.74
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	940	1.0	96	Ethyl acetate	140	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	9.8	1.0	8.8
4-Ethyltoluene	11	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	ND	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	10	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	65	1.0	10	1,3,5-Trimethylbenzene	13	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	73	1.0	27				

Surrogate Recoveries (%)

%SS1:	111	%SS2:	102
%SS3:	110		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

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All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
		Date Received: 01/04/12
530 Howard Street, Ste. 300	Client Contact: Leonard Niles	Date Extracted: 01/07/12
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 01/07/12

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1201050

Lab ID	1201050-007A	Initial Pressure (psia)	12.68
Client ID	SVP-14	Final Pressure (psia)	25.30
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	ND	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	580	1.0	96	Ethyl acetate	28	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	ND	1.0	8.8
4-Ethyltoluene	14	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	230	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	ND	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	61	1.0	10	1,3,5-Trimethylbenzene	19	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	52	1.0	27				

Surrogate Recoveries (%)

%SS1:	101	%SS2:	99
%SS3:	104		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

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All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
		Date Received: 01/04/12
530 Howard Street, Ste. 300	Client Contact: Leonard Niles	Date Extracted: 01/07/12-01/11/12
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 01/07/12-01/11/12

Volatile Organic Compounds in µg/m³*

Extraction Method: TO15 Analytical Method: TO15 Work Order: 1201050

Lab ID	1201050-008A	Initial Pressure (psia)	11.74
Client ID	SVP-15	Final Pressure (psia)	23.38
Matrix	Soil Gas		

Compound	Concentration *	DF	Reporting Limit	Compound	Concentration *	DF	Reporting Limit
Acetone	370	1.0	120	Acrylonitrile	ND	1.0	4.4
tert-Amyl methyl ether (TAME)	ND	1.0	8.5	Benzene	ND	1.0	6.5
Benzyl chloride	ND	1.0	11	Bromodichloromethane	ND	1.0	14
Bromoform	ND	1.0	21	Bromomethane	ND	1.0	7.9
1,3-Butadiene	ND	1.0	4.5	2-Butanone (MEK)	ND	1.0	150
t-Butyl alcohol (TBA)	ND	1.0	62	Carbon Disulfide	ND	1.0	6.3
Carbon Tetrachloride	ND	1.0	13	Chlorobenzene	ND	1.0	9.4
Chloroethane	ND	1.0	5.4	Chloroform	ND	1.0	9.9
Chloromethane	ND	1.0	4.2	Cyclohexane	ND	1.0	180
Dibromochloromethane	ND	1.0	17	1,2-Dibromo-3-chloropropane	ND	1.0	20
1,2-Dibromoethane (EDB)	ND	1.0	16	1,2-Dichlorobenzene	ND	1.0	12
1,3-Dichlorobenzene	ND	1.0	12	1,4-Dichlorobenzene	ND	1.0	12
Dichlorodifluoromethane	ND	1.0	10	1,1-Dichloroethane	ND	1.0	8.2
1,2-Dichloroethane (1,2-DCA)	ND	1.0	8.2	1,1-Dichloroethene	ND	1.0	8.1
cis-1,2-Dichloroethene	ND	1.0	8.1	trans-1,2-Dichloroethene	ND	1.0	8.1
1,2-Dichloropropane	ND	1.0	9.4	cis-1,3-Dichloropropene	ND	1.0	9.2
trans-1,3-Dichloropropene	ND	1.0	9.2	1,2-Dichloro-1,1,2,2-tetrafluoroethane	ND	1.0	14
Diisopropyl ether (DIPE)	ND	1.0	8.5	1,4-Dioxane	ND	1.0	7.3
Ethanol	6400	20	96	Ethyl acetate	410	1.0	7.3
Ethyl tert-butyl ether (ETBE)	ND	1.0	8.5	Ethylbenzene	ND	1.0	8.8
4-Ethyltoluene	12	1.0	10	Freon 113	ND	1.0	16
Heptane	ND	1.0	210	Hexachlorobutadiene	ND	1.0	22
Hexane	ND	1.0	180	2-Hexanone	ND	1.0	210
4-Methyl-2-pentanone (MIBK)	ND	1.0	8.3	Methyl-t-butyl ether (MTBE)	ND	1.0	7.3
Methylene chloride	ND	1.0	7.1	Naphthalene	ND	1.0	11
Propene	ND	1.0	88	Styrene	ND	1.0	8.6
1,1,1,2-Tetrachloroethane	ND	1.0	14	1,1,2,2-Tetrachloroethane	ND	1.0	14
Tetrachloroethene	78	1.0	14	Tetrahydrofuran	ND	1.0	6.0
Toluene	ND	1.0	7.7	1,2,4-Trichlorobenzene	ND	1.0	15
1,1,1-Trichloroethane	ND	1.0	11	1,1,2-Trichloroethane	ND	1.0	11
Trichloroethene	ND	1.0	11	Trichlorofluoromethane	ND	1.0	11
1,2,4-Trimethylbenzene	48	1.0	10	1,3,5-Trimethylbenzene	15	1.0	10
Vinyl Acetate	ND	1.0	180	Vinyl Chloride	ND	1.0	5.2
Xylenes, Total	49	1.0	27				

Surrogate Recoveries (%)

%SS1:	102	%SS2:	97
%SS3:	102		

Comments:

*vapor samples are reported in µg/m³.

ND means not detected above the reporting limit/method detection limit; N/A means analyte not applicable to this analysis.

surrogate diluted out of range or surrogate coelutes with another peak.

%SS = Percent Recovery of Surrogate Standard
DF = Dilution Factor

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QC SUMMARY REPORT FOR TO15

W.O. Sample Matrix: Soilgas | QC Matrix: Soilgas | BatchID: 63769 | WorkOrder: 1201050

EPA Method: TO15 | **Extraction: TO15** | **Spiked Sample ID: N/A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	Acceptance Criteria (%)		
	nL/L	nL/L	% Rec.	% Rec.	% RPD	% Rec.	MS / MSD	RPD	LCS
Acrylonitrile	N/A	25	N/A	N/A	N/A	90.7	N/A	N/A	70 - 130
tert-Amyl methyl ether (TAME)	N/A	25	N/A	N/A	N/A	86.8	N/A	N/A	70 - 130
Benzene	N/A	25	N/A	N/A	N/A	82.8	N/A	N/A	70 - 130
Benzyl chloride	N/A	25	N/A	N/A	N/A	89.9	N/A	N/A	70 - 130
Bromodichloromethane	N/A	25	N/A	N/A	N/A	87.7	N/A	N/A	70 - 130
Bromoform	N/A	25	N/A	N/A	N/A	89.9	N/A	N/A	70 - 130
Carbon Disulfide	N/A	25	N/A	N/A	N/A	88.1	N/A	N/A	70 - 130
Carbon Tetrachloride	N/A	25	N/A	N/A	N/A	86.9	N/A	N/A	70 - 130
Chlorobenzene	N/A	25	N/A	N/A	N/A	85.3	N/A	N/A	70 - 130
Chloroethane	N/A	25	N/A	N/A	N/A	92.6	N/A	N/A	70 - 130
Chloroform	N/A	25	N/A	N/A	N/A	86.1	N/A	N/A	70 - 130
Chloromethane	N/A	25	N/A	N/A	N/A	96.3	N/A	N/A	70 - 130
Dibromochloromethane	N/A	25	N/A	N/A	N/A	90.3	N/A	N/A	70 - 130
1,2-Dibromo-3-chloropropane	N/A	25	N/A	N/A	N/A	82.2	N/A	N/A	70 - 130
1,2-Dibromoethane (EDB)	N/A	25	N/A	N/A	N/A	88.3	N/A	N/A	70 - 130
1,3-Dichlorobenzene	N/A	25	N/A	N/A	N/A	127	N/A	N/A	70 - 130
1,4-Dichlorobenzene	N/A	25	N/A	N/A	N/A	128	N/A	N/A	70 - 130
Dichlorodifluoromethane	N/A	25	N/A	N/A	N/A	106	N/A	N/A	70 - 130
1,1-Dichloroethane	N/A	25	N/A	N/A	N/A	87.1	N/A	N/A	70 - 130
1,2-Dichloroethane (1,2-DCA)	N/A	25	N/A	N/A	N/A	89.6	N/A	N/A	70 - 130
cis-1,2-Dichloroethene	N/A	25	N/A	N/A	N/A	86.6	N/A	N/A	70 - 130
trans-1,2-Dichloroethene	N/A	25	N/A	N/A	N/A	86.8	N/A	N/A	70 - 130
1,2-Dichloropropane	N/A	25	N/A	N/A	N/A	84.7	N/A	N/A	70 - 130
cis-1,3-Dichloropropene	N/A	25	N/A	N/A	N/A	87.6	N/A	N/A	70 - 130
trans-1,3-Dichloropropene	N/A	25	N/A	N/A	N/A	88.7	N/A	N/A	70 - 130
1,2-Dichloro-1,1,2,2-tetrafluoroethane	N/A	25	N/A	N/A	N/A	105	N/A	N/A	70 - 130
Diisopropyl ether (DIPE)	N/A	25	N/A	N/A	N/A	81.9	N/A	N/A	70 - 130
1,4-Dioxane	N/A	25	N/A	N/A	N/A	105	N/A	N/A	70 - 130
Ethyl acetate	N/A	25	N/A	N/A	N/A	99.7	N/A	N/A	70 - 130
Ethyl tert-butyl ether (ETBE)	N/A	25	N/A	N/A	N/A	86.5	N/A	N/A	70 - 130
Ethylbenzene	N/A	25	N/A	N/A	N/A	84.3	N/A	N/A	70 - 130

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

* MS and / or MSD spike recoveries may not be near 100% or the RPDs near 0% if: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) if that specific sample matrix interferes with spike recovery.

N/A = not enough sample to perform matrix spike and matrix spike duplicate.
NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

Laboratory extraction solvents such as methylene chloride and acetone may occasionally appear in the method blank at low levels.

DHS ELAP Certification 1644

QA/QC Officer

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QC SUMMARY REPORT FOR TO15

W.O. Sample Matrix: Soilgas | QC Matrix: Soilgas | BatchID: 63769 | WorkOrder: 1201050

EPA Method: TO15 **Extraction: TO15** **Spiked Sample ID: N/A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	Acceptance Criteria (%)		
	nL/L	nL/L	% Rec.	% Rec.	% RPD	% Rec.	MS / MSD	RPD	LCS
Freon 113	N/A	25	N/A	N/A	N/A	83.4	N/A	N/A	70 - 130
Hexachlorobutadiene	N/A	25	N/A	N/A	N/A	128	N/A	N/A	70 - 130
4-Methyl-2-pentanone (MIBK)	N/A	25	N/A	N/A	N/A	98.9	N/A	N/A	70 - 130
Methyl-t-butyl ether (MTBE)	N/A	25	N/A	N/A	N/A	88	N/A	N/A	70 - 130
Methylene chloride	N/A	25	N/A	N/A	N/A	103	N/A	N/A	70 - 130
Naphthalene	N/A	25	N/A	N/A	N/A	122	N/A	N/A	70 - 130
Styrene	N/A	25	N/A	N/A	N/A	92.4	N/A	N/A	70 - 130
1,1,1,2-Tetrachloroethane	N/A	25	N/A	N/A	N/A	81.3	N/A	N/A	70 - 130
1,1,2,2-Tetrachloroethane	N/A	25	N/A	N/A	N/A	87.3	N/A	N/A	70 - 130
Tetrachloroethene	N/A	25	N/A	N/A	N/A	84.1	N/A	N/A	70 - 130
Tetrahydrofuran	N/A	25	N/A	N/A	N/A	83.1	N/A	N/A	70 - 130
Toluene	N/A	25	N/A	N/A	N/A	84.2	N/A	N/A	70 - 130
1,2,4-Trichlorobenzene	N/A	25	N/A	N/A	N/A	103	N/A	N/A	70 - 130
1,1,1-Trichloroethane	N/A	25	N/A	N/A	N/A	88.5	N/A	N/A	70 - 130
1,1,2-Trichloroethane	N/A	25	N/A	N/A	N/A	87.1	N/A	N/A	70 - 130
Trichloroethene	N/A	25	N/A	N/A	N/A	83.7	N/A	N/A	70 - 130
1,2,4-Trimethylbenzene	N/A	25	N/A	N/A	N/A	129	N/A	N/A	70 - 130
1,3,5-Trimethylbenzene	N/A	25	N/A	N/A	N/A	95	N/A	N/A	70 - 130
Vinyl Chloride	N/A	25	N/A	N/A	N/A	91.4	N/A	N/A	70 - 130
%SS1:	N/A	500	N/A	N/A	N/A	102	N/A	N/A	70 - 130
%SS2:	N/A	500	N/A	N/A	N/A	103	N/A	N/A	70 - 130
%SS3:	N/A	500	N/A	N/A	N/A	111	N/A	N/A	70 - 130

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:
NONE

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

* MS and / or MSD spike recoveries may not be near 100% or the RPDs near 0% if: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) if that specific sample matrix interferes with spike recovery.

N/A = not enough sample to perform matrix spike and matrix spike duplicate.
NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

Laboratory extraction solvents such as methylene chloride and acetone may occasionally appear in the method blank at low levels.

DHS ELAP Certification 1644

QA/QC Officer

McCampbell Analytical, Inc.
"When Quality Counts"

1534 Willow Pass Road, Pittsburg, CA 94565-1701
Toll Free Telephone: (877) 252-9262 / Fax: (925) 252-9269
http://www.mccampbell.com / E-mail: main@mccampbell.com

QC SUMMARY REPORT FOR TO15

W.O. Sample Matrix: Soilgas | QC Matrix: Soilgas | BatchID: 63769 | WorkOrder: 1201050

EPA Method: TO15 | **Extraction: TO15** | **Spiked Sample ID: N/A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	Acceptance Criteria (%)		
	nL/L	nL/L	% Rec.	% Rec.	% RPD	% Rec.	MS / MSD	RPD	LCS

BATCH 63769 SUMMARY

Lab ID	Date Sampled	Date Extracted	Date Analyzed	Lab ID	Date Sampled	Date Extracted	Date Analyzed
1201050-001A	01/03/12 11:09 AM	01/05/12	01/05/12 11:12 PM	1201050-002A	01/03/12 12:05 PM	01/05/12	01/05/12 11:53 PM
1201050-003A	01/03/12 12:55 PM	01/06/12	01/06/12 12:34 AM	1201050-004A	01/03/12 1:48 PM	01/06/12	01/06/12 1:15 AM
1201050-005A	01/03/12 2:35 PM	01/06/12	01/06/12 1:56 AM	1201050-006A	01/03/12 3:33 PM	01/06/12	01/06/12 2:38 AM
1201050-007A	01/03/12 4:13 PM	01/07/12	01/07/12 10:23 AM	1201050-008A	01/03/12 4:55 PM	01/07/12	01/07/12 11:06 AM
1201050-008A	01/03/12 4:55 PM	01/11/12	01/11/12 4:18 AM				

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

* MS and / or MSD spike recoveries may not be near 100% or the RPDs near 0% if: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) if that specific sample matrix interferes with spike recovery.

N/A = not enough sample to perform matrix spike and matrix spike duplicate.
NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

Laboratory extraction solvents such as methylene chloride and acetone may occasionally appear in the method blank at low levels.

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Analytical Report

All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
		Date Received: 01/04/12
530 Howard Street, Ste. 300	Client Contact: Leonard Niles	Date Reported: 01/18/12
San Francisco, CA 94105	Client P.O.:	Date Completed: 01/18/12

WorkOrder: 1201050 A

January 18, 2012

Dear Leonard:

Enclosed within are:

1) The results of the **8** analyzed samples from your project: **#11181.23; Edgewood SVS-2,**
2) QC data for the above samples, and
3) A copy of the chain of custody.

All analyses were completed satisfactorily and all QC samples were found to be within our control limits.

If you have any questions or concerns, please feel free to give me a call. Thank you for choosing McCampbell Analytical Laboratories for your analytical needs.

Best regards,

Angela Rydelius
Laboratory Manager
McCampbell Analytical, Inc.

The analytical results relate only to the items tested.

1201050

McCAMPBELL ANALYTICAL INC.
1534 WILLOW PASS ROAD / PITTSBURG, CA 94565-1701
Website: www.mccampbell.com / Email: main@mccampbell.com
Telephone: (877) 252-9262 / Fax: (925) 252-9269

CHAIN OF CUSTODY RECORD

TURN AROUND TIME ☐ RUSH ☐ 24 HR ☐ 48 HR ☐ 72 HR ☑ 5 DAY

EDF Required? Coelt (Normal) (No) Write On (DW) No

Lab Use Only

Pressurized By	Date	Pressurization Gas N2	Pressurization Gas He

Report To: Leonard Niles Bill To: Darlene Torio

Company: AllWest Environmental, Inc.

530 Howard Street, Suite 300
San Francisco, CA 94105

E-Mail: Leonard@allwest1.com
Darlene@allwest1.com

Tele: (415)391-2510 Fax: (415)391-2008

Project #: 1118l.23 Project Name: Edgewood SVS-2

Project Location: Edgewood Plaza, Palo Alto, CA

Sampler Signature: Leonard Niles

Helium Shroud SN#:

Other:

Notes: Initial vacuums all measured with gauge #MAN316M-985; final vacuums mostly with manifold gauges (some with # 985)

Field Sample ID (Location)	Collection Date	Collection Time	Canister SN#	Manifold / Sampler Kit SN#	Analysis Requested	Indoor Air	Soil Gas	Canister Pressure/Vacuum Initial "Hg	Final "Hg	Receipt	Final (psi)
SVP-8	1/3/12	11:09	1461	MAN316-826	VOCs-TO-15	Received 1/11/12	X	-27.5"	-4.5"		
SVP-9	"	12:05	6204	MAN316-718	VOCs-TO-15		X	-28.9"	-4.5"		
SVP-10	"	12:55	6207	MAN316-819	VOCs-TO-15		X	-28.9"	-5.1"		
SVP-11	"	13:48	A7509	MAN316T-776	VOCs-TO-15		X	-29.4"	-4.7"		
SVP-12	"	14:35	6302	MAN316T-993	VOCs-TO-15		X	-28.9"	-4.3"		
SVP-13	"	15:33	A7525	MAN316T-994	VOCs-TO-15		X	-29.7"	-6.7"		
SVP-14	"	16:13	A7518	MAN316T-995	VOCs-TO-15		X	-28.5"	-4.9"		
SVP-15	"	16:55	A7524	MAN316T-998	VOCs-TO-15		X	-28.8"	-6.9"		

Relinquished By:	Date:	Time:	Received By:
Leonard Niles	1/11	1315	
	1/11/12	1530	Me Vall

Temp (°C): n/a Work Order #: 1201050

Equipment Condition: broke inline filter connector on MAN316M-985

Shipped Via: R.P. (MAI carrier)

McCampbell Analytical, Inc.
1534 Willow Pass Rd
Pittsburg, CA 94565-1701
(925) 252-9262

CHAIN-OF-CUSTODY RECORD

WorkOrder: 1201050 A **ClientCode: AWE**

☐ WaterTrax ☐ WriteOn ☐ EDF ☐ Excel ☐ Fax ☑ Email ☐ HardCopy ☐ ThirdParty ☐ J-flag

Report to:
Leonard Niles
All West Environmental, Inc
530 Howard Street, Ste. 300
San Francisco, CA 94105
(415) 391-2510 FAX: (415) 391-2008

Email: Leonard@allwest1.com
cc:
PO:
ProjectNo: #11181.23; Edgewood SVS-2

Bill to:
Darlene Torio
All West Environmental, Inc
530 Howard Street, Ste.300
San Francisco, CA 94105
darlene@allwest1.com

Requested TAT: **5 days**
Date Received: **01/04/2012**
Date Add-On: **01/11/2012**
Date Printed: **01/11/2012**

Lab ID	Client ID	Matrix	Collection Date	Hold	Requested Tests (See legend below) 1	2	3	4	5	6	7	8	9	10	11	12
1201050-001	SVP-8	Soil Gas	1/3/2012 11:09	☐	A											
1201050-002	SVP-9	Soil Gas	1/3/2012 12:05	☐	A											
1201050-003	SVP-10	Soil Gas	1/3/2012 12:55	☐	A											
1201050-004	SVP-11	Soil Gas	1/3/2012 13:48	☐	A											
1201050-005	SVP-12	Soil Gas	1/3/2012 14:35	☐	A											
1201050-006	SVP-13	Soil Gas	1/3/2012 15:33	☐	A											
1201050-007	SVP-14	Soil Gas	1/3/2012 16:13	☐	A											
1201050-008	SVP-15	Soil Gas	1/3/2012 16:55	☐	A											

Test Legend:

1	HELIUM_LC_SOILGAS(%)	2		3		4		5	
6		7		8		9		10	
11		12							

Prepared by: Melissa Valles

Comments: He as Leak Check added 1/11/12

NOTE: Soil samples are discarded 60 days after results are reported unless other arrangements are made (Water samples are 30 days).
Hazardous samples will be returned to client or disposed of at client expense.

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All West Environmental, Inc	Client Project ID: #11181.23; Edgewood SVS-2	Date Sampled: 01/03/12
530 Howard Street, Ste. 300		Date Received: 01/04/12
	Client Contact: Leonard Niles	Date Extracted: 01/13/12
San Francisco, CA 94105	Client P.O.:	Date Analyzed: 01/13/12

Helium*

Extraction method: ASTM D 1946-90 Analytical methods: ASTM D 1946-90 Work Order: 1201050

Lab ID	Client ID	Matrix	Initial Pressure	Final Pressure	Helium	DF	% SS	Comments
001A	SVP-8	Soil Gas	13.18	26.28	0.032	1	N/A	
002A	SVP-9	Soil Gas	13.04	25.98	ND	1	N/A	
003A	SVP-10	Soil Gas	12.45	24.82	0.0056	1	N/A	
004A	SVP-11	Soil Gas	13.14	26.18	0.0054	1	N/A	
005A	SVP-12	Soil Gas	13.28	26.48	0.0076	1	N/A	
006A	SVP-13	Soil Gas	11.92	23.74	0.010	1	N/A	
007A	SVP-14	Soil Gas	12.68	25.30	0.0036	1	N/A	
008A	SVP-15	Soil Gas	11.74	23.83	0.028	1	N/A	

Reporting Limit for DF =1; ND means not detected at or above the reporting limit	W	psia	psia	NA	NA
	SoilGas	psia	psia	0.002	%

* vapor samples are reported in %.

%SS = Percent Recovery of Surrogate Standard

DF = Dilution Factor

DHS ELAP Certification 1644

Angela Rydelius, Lab Manager

McCampbell Analytical, Inc.
"When Quality Counts"

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Toll Free Telephone: (877) 252-9262 / Fax: (925) 252-9269
http://www.mccampbell.com / E-mail: main@mccampbell.com

QC SUMMARY REPORT FOR ASTM D 1946-90

W.O. Sample Matrix: Soilgas | QC Matrix: Soilgas | BatchID: 63974 | WorkOrder: 1201050

EPA Method: ASTM D 1946-90 **Extraction: ASTM D 1946-90** **Spiked Sample ID: N/A**

Analyte	Sample	Spiked	MS	MSD	MS-MSD	LCS	Acceptance Criteria (%)		
	%	%	% Rec.	% Rec.	% RPD	% Rec.	MS / MSD	RPD	LCS
Helium	N/A	0.010	N/A	N/A	N/A	130	N/A	N/A	70 - 130

All target compounds in the Method Blank of this extraction batch were ND less than the method RL with the following exceptions:
NONE

BATCH 63974 SUMMARY

Lab ID	Date Sampled	Date Extracted	Date Analyzed	Lab ID	Date Sampled	Date Extracted	Date Analyzed
1201050-001A	01/03/12 11:09 AM	01/13/12	01/13/12 1:22 PM	1201050-002A	01/03/12 12:05 PM	01/13/12	01/13/12 1:41 PM
1201050-003A	01/03/12 12:55 PM	01/13/12	01/13/12 1:54 PM	1201050-004A	01/03/12 1:48 PM	01/13/12	01/13/12 2:07 PM
1201050-005A	01/03/12 2:35 PM	01/13/12	01/13/12 2:20 PM	1201050-006A	01/03/12 3:33 PM	01/13/12	01/13/12 2:33 PM
1201050-007A	01/03/12 4:13 PM	01/13/12	01/13/12 2:46 PM	1201050-008A	01/03/12 4:55 PM	01/13/12	01/13/12 2:59 PM

MS = Matrix Spike; MSD = Matrix Spike Duplicate; LCS = Laboratory Control Sample; LCSD = Laboratory Control Sample Duplicate; RPD = Relative Percent Deviation.

% Recovery = 100 * (MS-Sample) / (Amount Spiked); RPD = 100 * (MS - MSD) / ((MS + MSD) / 2).

MS / MSD spike recoveries and / or %RPD may fall outside of laboratory acceptance criteria due to one or more of the following reasons: a) the sample is inhomogenous AND contains significant concentrations of analyte relative to the amount spiked, or b) the spiked sample's matrix interferes with the spike recovery.

N/A = not enough sample to perform matrix spike and matrix spike duplicate.

NR = analyte concentration in sample exceeds spike amount for soil matrix or exceeds 2x spike amount for water matrix or sample diluted due to high matrix or analyte content.

DHS ELAP Certification 1644

QA/QC Officer

Appendix D

APPLICATION FOR AUTHORIZATION TO USE

REPORT TITLE: SOIL VAPOR INVESTIGATION REPORT
EDGEWOOD PLAZA
2050 CHANNING AVENUE & 2103–2129 SAINT FRANCIS DRIVE
PALO ALTO, CALIFORNIA

PROJECT NUMBER: 11181.23

To: AllWest Environmental, Inc.
530 Howard Street, Suite 300
San Francisco, CA 94105

From (Applicant): _____

_____

_____
(Please clearly identify name and address of person/entity applying for permission to use or copy this document)

Ladies and Gentlemen:

Applicant hereby applies for permission to rely upon AllWest's work product, as described above, for the purpose of: (state here the purpose for which you wish to rely upon the work product)

Applicant only can accept and rely upon AllWest work product under the strict understanding that Applicant is bound by all provisions in the Terms and Conditions attached to the report. Every report, recommendation, finding, or conclusion issued by AllWest shall be subject to the limitations stated in the Agreement and subject report(s). If this is agreeable, please sign below and return one copy of this letter to us along with the applicable fees. Upon receipt and if acceptable, our signed letter will be returned. AllWest may withhold permission at its sole discretion or require additional re-use fees or terms.

FEES: A $1,000 coordination and reliance fee, payable in advance, will apply. If desired, for an additional $75 report reproduction fee, we will reissue the report in the name of the Applicant; the report date, however, will remain the same. All checks will be returned if your request for reliance is not approved.

REQUESTED BY	**APPROVED BY**
_____	**AllWest Environmental, Inc.**
Applicant Company	
_____	_____
Print Name and Title	Print Name and Title
_____	_____
Signature and Date	Signature and Date

GENERAL CONDITIONS TO THE WORK AUTHORIZATION AGREEMENT

It is hereby agreed that the Client retains AllWest to provide services as set forth in the Work Authorization attached hereto (the "Work"). This contract shall be controlled by the following terms and conditions, and these terms and conditions shall also control any further assignments performed pursuant to this Work Authorization. Client's signature on this Work Authorization constitutes Client's agreement to the General Conditions.

Client agrees that AllWest is responsible only for the services set forth within the Scope of Work. In addition to the services to be performed by AllWest as described in the Work Authorization, the following items shall for the purposes of this Agreement be termed "Additional Services": (a) work resulting from changes in scope or magnitude of the Work as described therein, (b) work resulting from changes necessary because of construction cost over-runs, (c) work resulting from implementation of alternative or different designs from that first contemplated by the Parties, (d) work resulting from corrections or revisions required because of errors or omissions in construction by the building contractors, (e) work due to extended design or construction time schedules, (f) layout surveys in review of in-place constructed elements, and (g) services as an expert witness in connection with any public hearing, arbitration or proceedings of a court of record with respect to the Work on the Project. AllWest will be compensated by Client for any Additional Services on a time and materials basis in accordance with rates specified under the Work Authorization with appropriate fee increases for inflation. The Client is solely responsible for making any disclosures or reports to any third party and for the taking of corrective, remedial, or mitigative action.

FEES AND COSTS

1. AllWest shall charge for work performed by its personnel at the rates identified in the Work Authorization. These rates are subject to reasonable increases by AllWest upon giving Client 30 days advance notice. Reimbursable Costs will be charged to the Client in addition to the fees for the basic services under this Agreement and all Additional Services (defined below) under the Agreement. Reimbursable Costs include, but are not limited to, expenses for travel, including transportation, meals, lodging, long distance telephone and other related expenses, as well as the costs of reproduction of all drawings for the Client's use, costs for specifications and type-written reports, permit and approval fees, automobile travel reimbursement, costs and fees of subcontractors, and soil and other materials testing. No overtime is accrued for time spent in travel. All costs incurred which relate to the services or materials provided by a contractor or subcontractor to AllWest shall be invoiced by AllWest on the basis of cost plus twenty percent (20%). Automobile travel reimbursement shall be at the rate of fifty- eight cents ($0.58) per mile. All other reimbursable costs shall be invoiced and billed by AllWest at the rate of 1.1 times the direct cost to AllWest. Reimbursable costs will be charged to the client only as outlined in the Work Authorization if the scope of work is for Phase I Environmental Site Assessment, Property Condition Assessment, Seismic Assessment or ALTA survey. Invoices for work performed shall be submitted monthly. Payment will be due upon receipt of invoice. Client shall pay interest on the balance of unpaid invoices which are overdue by more than 30 days, at a rate of 18% per annum as well as all attorney fees and costs incurred by AllWest to secure payment of unpaid invoices. AllWest may waive such fees at its sole discretion.

LIMITATION OF LIABILITY

2. AllWest will perform its work in accordance with the existing standard of care of its industry, as of the time of the work being performed in that locale. AllWest makes no warranties, express or implied regarding its work. Client expressly agrees that to the fullest extent permitted by law, AllWest's maximum liability, as well as that of its employees and agents, to Client for any claims arising from AllWest's services, shall be $50,000 or its fees, whichever is higher. In the event Client makes a written request for a higher limitation of liability, AllWest may increase this limit for a mutually negotiated higher fee commensurate with the increased risk to AllWest, provided however, that such agreed increase in fee and limitation of liability amount is memorialized by separate written agreement which expressly amends the terms of this clause. As used in this paragraph, the term "liability" means liability of any kind, whether in contract (including breach of warranty), in tort (including negligence), in strict liability, or otherwise, for any and all injuries, claims, losses, expenses, or damages whatsoever arising out of or in any way related to AllWest's services or the services of AllWest's subcontractors, consultants, agents, officers, directors, and employees from any cause(s). AllWest shall not be liable for any claims of loss of profits or any other indirect, incidental, or consequential damages of any nature whatsoever.

INDEMNIFICATION

3. Notwithstanding any other provision of this Agreement, Client agrees, to the fullest extent permitted by law, to waive any claim against, release from any liability or responsibility for, and to assume the defense of, indemnify and hold harmless AllWest, its employees, agents and sub-consultants (collectively, Consultant) from and against any and all damages, liabilities, claims, actions or costs of any kind, including reasonable attorney's fees and defense costs, arising or alleged to arise out of or to be in any way connected with the Project or the performance or non-performance of Consultant of any services under this Agreement, excepting only any such liabilities determined by a court or other forum of competent jurisdiction to have been caused by the negligence or willful misconduct of Consultant. This provision shall be in addition to any rights of indemnity that Consultant may have under the law and shall survive and remain in effect following the termination of this Agreement for any reason. Should any part of this provision be determined to be unenforceable, AllWest and Client agree that the rest of the provision shall apply to the maximum extent permitted by law. The Client's duty to defend AllWest shall arise immediately upon tender of any matter potentially covered by the above obligations to indemnify and hold harmless.

MEDIATION & JUDICIAL REFERENCE

4. In an effort to resolve any conflicts or disputes that arise regarding the performance of this agreement, the Client & AllWest agree that all such disputes shall be submitted to non-binding mediation, using a mutually agreed upon mediation service experienced in the resolution of construction disputes. Unless the parties mutually agree otherwise, such mediation shall be a condition precedent to the initiation of any other adjudicative proceedings. It is further agreed that any dispute that is not settled pursuant to such mediation shall be adjudicated by a court appointed referee in accordance with the Judicial Reference procedures as set forth in California Code of Civil Procedure Section 638 et seq. The parties hereby mutually agree to waive any right to a trial by jury regarding any dispute arising out of this agreement.

The parties further agree to include a similar mediation, Judicial Reference & waiver of jury trial provision in their agreements with other independent contractors & consultants retained for the project and require them to similarly agree to these dispute resolution procedures. The cost of said Mediation shall be split equally between the parties. This agreement to mediate shall be specifically enforceable under the prevailing law of the jurisdiction in which this agreement was signed.

HAZARDOUS WASTE

5. Client acknowledges that AllWest and its sub-contractors have played no part in the creation of any hazardous waste, pollution sources, nuisance, or chemical or industrial disposal problem, which may exist, and that AllWest has been retained for the sole purpose of performing the services set out in the scope of work within this Agreement, which may include, but is not necessarily limited to such services as assisting the Client in assessing any problem which may exist and in assisting the Client in formulating a remedial program. Client acknowledges that while necessary for investigations, commonly used exploration methods employed by AllWest may penetrate through contaminated materials and serve as a connecting passageway between the contaminated material and an uncontaminated aquifer or groundwater, possibly inducing cross contamination. While back-filling with grout or other means, according to a state of practice design is intended to provide a seal against such passageway, it is recognized that such a seal may be imperfect and that there is an inherent risk in drilling borings of performing other exploration methods in a hazardous waste site.

AllWest will not sign or execute hazardous waste manifests or other waste tracking documents on behalf of Client unless Client specifically establishes AllWest as an express agent of Client under a written agency agreement approved by AllWest. In addition, Client agrees that AllWest shall not be required to sign any documents, no matter requested by whom, that would have the effect of AllWest providing any form of certification, guarantee, or warranty as to any matter or to opine on conditions for which the existence AllWest cannot ascertain. Client also agrees that it shall never seek or otherwise attempt to have AllWest provide any form of such certification, guarantee or warranty in exchange for resolution of any disputes between Client and AllWest, or as a condition precedent to making payment to AllWest for fees and costs owing under this Agreement.

Client understands and agrees that AllWest is not, and has no responsibility as, a generator, operator, treater, storer, transporter , arranger or disposer of hazardous or toxic substances found or identified at the site, including investigation-derived waste. The Client shall undertake and arrange for the removal, treatment, storage, disposal and/or treatment of hazardous material and investigation derived waste (such as drill cuttings). AllWest's responsibilities shall be limited to recommendations regarding such matters and assistance with appropriate arrangements if authorized by Client.

FORCE MAJUERE

6. Neither party shall be responsible for damages or delays in performance under this Agreement caused by acts of God, strikes, lockouts, accidents or other events or condition (other than financial inability) beyond the other Party’s reasonable control.

TERMINATION

7. This Agreement may be terminated by either party upon seven (7) days' written notice should the other party substantially fail to perform in accordance with its duties and responsibilities as set forth in this Agreement and such failure to perform is through no fault of the party initiating the termination. Client agrees that if it chooses to terminate AllWest for convenience, and AllWest has otherwise satisfactorily performed its obligations under this Agreement to that point, AllWest shall be paid no less than eighty percent (80%) of the contract price, provided, however, that if AllWest shall have completed more than eighty percent of the Work at the time of said termination, AllWest shall be compensated as provided in the Work Authorization for all services performed prior to the termination date which fall within the scope of work described in the Work Authorization and may as well, at its sole discretion and in accordance with said Schedule of Fees, charge Client, and Client agrees to pay AllWest’s reasonable costs and labor in winding up its files and removing equipment and other materials from the Project.

Upon notice of termination by Client to AllWest, AllWest may issue notice of such termination to other consultants, contractors, subcontractors and to governing agencies having jurisdiction over the Project, and take such other actions as are reasonably necessary in order to give notice that AllWest is no longer associated with the Project and to protect AllWest from claims of liability from the work of others.

DOCUMENTS

8. Any documents prepared by AllWest, including, but not limited to proposals, project specifications, drawings, calculations, plans and maps, and any ideas and designs incorporated therein, as well as any reproduction of the above are instruments of service and shall remain the property of AllWest and AllWest retains copyrights to these instruments of service. AllWest grants to Client a non-exclusive license to use these instruments of service for the purpose of completing and maintaining the Project. The Client shall be permitted to retain a copy of any instruments of service, but Client expressly agrees and acknowledges that the instruments of service may not be used by the Client on other projects, or for any other purpose, except the current one, unless Client first obtains a written agreement expanding the license to such use from AllWest, and with appropriate compensation to AllWest.

Client shall furnish, or cause to be furnished to AllWest all documents and information known to Client that relate to the identity, location, quantity, nature, or characteristics of any asbestos, PCBs, or any other hazardous materials or waste at, on or under the site. In addition, Client will furnish or cause to be furnished such reports, data, studies, plans, specifications, documents and other information on surface or subsurface site conditions, e.g., underground tanks, pipelines and buried utilities, required by AllWest for proper performance of its services. IF Client fails to provide AllWest with all hazardous material subject matter reports including geotechnical assessments in its possession during the period that AllWest is actively providing its services (including up to 30 days after its final invoice), Client shall release AllWest from any and all liability for risks and damages the Client incurs resulting from its reliance on AllWest’s professional opinion. AllWest shall be entitled to rely upon Client - provided documents and information in performing the services required in this Agreement; however, AllWest assumes no responsibility or liability for the accuracy or completeness of Client-provided documents. Client-provided documents will remain the property of the Client.

ACCESS TO PROJECT

9. Client grants to AllWest the right of access and entry to the Project at all times necessary for AllWest to perform the Work. If Client is not the owner of the Project, then Client represents that Client has full authority to grant access and right of entry to AllWest for the purpose of AllWest's performance of the Work. This right of access and entry extends fully to any agents, employees, contractors or subcontractors of AllWest upon reasonable proof of association with AllWest. Client’s failure to provide such timely access and permission shall constitute a material breach of this Agreement excusing AllWest from performance of its duties under this Agreement.

CONFIDENTIAL INFORMATION

10. Both Client and AllWest understand that in conjunction with AllWest's performance of the Work on the project, both Client and AllWest may receive or be exposed to Proprietary Information of the other. As used herein, the term "Proprietary Information" refers to any and all information of a confidential, proprietary or secret nature which may be either applicable to, or relate in any way to: (a) the personal, financial or other affairs of the business of each of the Parties, or (b) the research and development or investigations of each of the Parties. Proprietary Information includes, for example and without limitation, trade secrets, processes, formulas, data, know-how, improvements, inventions, techniques, software technical data, developments, research projects, plans for future development, marketing plans and strategies. Each of the Parties agrees that all Proprietary Information of the other party is and shall remain exclusively the property of that other party. The parties further acknowledge that the Proprietary Information of the other party is a special, valuable and unique asset of that party, and each of the Parties agrees that at all times during the terms of this Agreement and thereafter to keep in confidence and trust all Proprietary Information of the other party, whether such Proprietary Information was obtained or developed by the other party before, during or after the term of this Agreement. Each of the Parties agrees not to sell, distribute, disclose or use in any other unauthorized manner the Proprietary Information of the other party. AllWest further agrees that it will not sell, distribute or disclose information or the results of any testing obtained by AllWest during the performance of the Work without the prior written approval of Client unless required to do so by federal, state or local statute, ordinance or regulation.

INDEPENDENT CONTRACTOR

11. Both Client and AllWest agree that AllWest will act as an independent contractor in the performance of the Work under this Agreement. All persons or parties employed by AllWest in connection with the Work are the agents, employees or subcontractors of AllWest and not of Client. Accordingly, AllWest shall be responsible for payment of all taxes arising out of AllWest's activities in performing the Work under this Agreement.

ENTIRE AGREEMENT

12. This Agreement contains the entire agreement between the Parties pertaining to the subject matter contained in it and supersedes and replaces in its entirety all prior and contemporaneous proposals, agreements, representations and understandings of the Parties. The Parties have carefully read and understand the contents of this Agreement and sign their names to the same as their own free act.

MODIFICATION / WAIVER / PARTIAL INVALIDITY

13. The terms of this Agreement may be modified only by a writing signed by both Parties. Failure on the part of either party to complain of any act or omission of the other, or to declare the other party in default, shall not constitute a waiver by such party of its rights hereunder. If any provision of this Agreement or its application be unenforceable to any extent, the Parties agree that the remainder of this Agreement shall not be affected and shall be enforced to the greatest extent permitted by law.

INUREMENT / TITLES

14. Subject to any restrictions on transfers, assignments and encumbrances set forth herein, this Agreement shall inure to the benefit of and be binding upon the undersigned Parties and their respective heirs, executors, legal representatives, successors and assigns. Paragraph titles or captions contained in this Agreement are inserted only as a matter of convenience, and for reference only, and in no way limit, define or extend the provisions of any paragraph. , et al., incurred in that action or proceeding, in addition to any other relief to which it or they may be entitled.

INTERPRETATION / ADDITIONAL DOCUMENTS

15. The words "Client" and "AllWest" as used herein shall include the plural as well as the singular. Words used in the neuter gender include the masculine and feminine. Words used in the masculine gender include the feminine and neuter. If there is more than one Client, the obligations hereunder imposed on Client shall be joint and several. The terms of this Agreement were fully negotiated by the Parties and shall not be construed for or against the Client or AllWest but shall be interpreted in accordance with the general meaning of the language in an effort to reach the intended result.

AUTHORITY

16. Each of the persons executing this Agreement on behalf of a corporation does hereby covenant and warrant that the corporation is duly authorized and existing under the laws of its respective state of incorporation, that the corporation has and is qualified to do business in its respective state of incorporation, that the corporation has the full right and authority to enter into this Agreement, and that each person signing on behalf of the corporation is authorized to do so. If the Client is a joint venture, limited liability company or a partnership, the signatories below warrant that said entity is properly and duly organized and existing under the laws of the state of its formation and pursuant to the organizational and operating document of the entity, and the laws of the state of its formation, said signatory has authority act on behalf of and commit the entity to this Agreement.

COUNTERPARTS

17. This Agreement may be signed in counterparts by each of the Parties hereto and, taken together, the signed counterparts shall constitute a single document.

THIRD PARTY BENEFICIARIES / CONTROLLING LAW

18. There are no intended third party beneficiaries of this Agreement. The services, data & opinions expressed by AllWest are for the sole use of the client, are for a particular project and may not be relied upon by anyone other than the client. This Agreement shall be controlled by the laws of the State of California and any action by either party to enforce this Agreement shall be brought in San Francisco County, California.

TIME BAR TO LEGAL ACTION

19. All legal actions by either party against the other related to this Agreement, shall be barred after one year has passed from the time the claimant knew or should have known of its claim, and under no circumstances shall be initiated after two years have passed from the date by which AllWest completes its services.