

November 12, 2013



**Via Electronic Mail**

Joseph Callahan  
South Main Senior Lifestyles, LLC  
c/o Callahan Property Company  
5674 Stoneridge Drive, Suite 212  
Pleasanton, CA 94588  
JWC@CallahanPropertyCo.com

**Re: Preliminary Air Quality and Greenhouse Gas Impacts for Milpitas Senior Housing South Main Street, Milpitas, California**

Dear Mr. Callahan:

ENVIRON International Corporation (ENVIRON) has reviewed trip generation rates for the Milpitas Senior Housing at South Main Street and Cedar Way, in Milpitas, California ("Project") under development by South Main Senior Lifestyles, LLC. Based on our preliminary review of trip generation rates for the proposed Project, we believe that air quality and greenhouse gas (GHG) impacts of the Project are substantially equivalent to those of the land uses reviewed in the EIR prepared on the Midtown Milpitas Specific Plan and below the impacts of a project proposed for the same site and approved by the City of Milpitas in 2008.

**Project Trip Generation Rates**

TJKM Transportation Consultants, in a letter dated November 7, 2013 (the "TJKM letter") provided daily trip generation rates for the Project of 1,107 trips. The TJKM letter also provides daily trip generation rates for the land uses at the Project site evaluated under the Midtown Milpitas Specific Plan (the "Specific Plan" trip generation rates) of 1,020 trips and the 2008 proposed and approved Trammell Crow project (the "2008 approved project" trip generation rates) of 2,574 trips.

**Project Air Quality and GHG Impacts**

For California Environmental Quality Act (CEQA) impact analyses, emissions from vehicle trips, energy use, area sources, water usage and waste generation from a given project all contribute to air quality and GHG impacts, which are compared to thresholds set by the lead agency. However, of all these source categories, vehicle emissions and energy use make up the largest contributions. As such, for this analysis we focus solely on vehicle trips and energy use.

Vehicle Emissions:

Higher vehicle trip rates are associated with greater air quality impacts and higher GHG emissions.

Because the vehicle trip rates of the Project are below those considered acceptable by the City of Milpitas for the 2008 approved project, impacts from air quality and GHG emissions are likewise lower than impacts considered acceptable for the 2008 approved project. The 2008 approved project air quality and GHG emissions were below the air quality and GHG thresholds selected by the City of Milpitas. Project impacts are likewise lower than the air quality and GHG thresholds selected by the City of Milpitas.

The trip generation rates from the Project are lower than those of the 2008 approved project and only differ from the Specific Plan trip generation rates by 87 trips per day, out of 1,107 trips per day. Accordingly, the air quality and GHG impacts from the Project will be below those of the 2008 approved project and roughly equivalent to those examined in the Specific Plan.

The Project is also more efficient with respect to trip generation than the 2008 approved project, resulting in only 2.8 trips per dwelling unit, as opposed to 6.7.

#### Energy Use:

In addition to mobile source emissions (i.e., those from traffic), emissions from energy use at the Project may be substantially the same or lower than both the uses examined in the Specific Plan and the approved 2008 use. For example, the California Energy Commission has released 2013 Title 24 building efficiency standards, which take effect January 1, 2014, which exceed the 2008 energy efficiency standards by 25%.<sup>1</sup> This is a substantial increase in energy efficiency over the uses examined in the 2002 EIR and also over the previous standard which would have been evaluated for the 2008 project. As such, the proposed Project is likely to be much more energy efficient than a development that the City of Milpitas has previously approved.

#### **Closing**

The air quality and GHG impacts of the Project are substantially equivalent to or lower than those of both the land uses examined in the Specific Plan and a project proposed for the same site and approved by the City of Milpitas in 2008. Please note this reflects a preliminary analysis based solely on trip generation rates presented in the TJKM letter; however, we anticipate this conclusion to be consistent with a more robust analysis taking into account all emissions sources from the Project. Please feel free to contact Michael at 415.796.1934 if you have any questions about this letter. Thank you for the opportunity to assist you with these matters.

Sincerely,



Michael Keinath, PE  
Senior Manager



Shari Beth Libicki, PhD  
Principal

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<sup>1</sup> California Energy Commission website [http://www.energy.ca.gov/releases/2012\\_releases/2012-05-31\\_energy\\_commission\\_approves\\_more\\_efficient\\_buildings\\_nr.html](http://www.energy.ca.gov/releases/2012_releases/2012-05-31_energy_commission_approves_more_efficient_buildings_nr.html), according to which the 2013 Building Energy Efficiency Standards for residential construction are 25% more efficient than previous standards. The Standards will take effect on January 1, 2014 and include more efficient insulation, windows, ventilation systems and other features that reduce energy consumption.