

A black and white photograph of the former San José City Hall building. The building is a large, modern structure with a curved facade and a grid of windows. In the foreground, there is a landscaped area with a curved path, young trees, and a garden bed. The sky is clear and bright.

# Former San José City Hall Project Environmental Impact Report

County of Santa Clara

March 2022

FINAL

# FINAL

## Prepared for:

County of Santa Clara  
Facilities and Fleets Department  
2310 N. First Street, Suite 200  
San José, CA 95131

## Prepared by:

AECOM  
4 North Second Street  
Suite 675  
San José, CA, 95113  
USA  
aecom.com

**FINAL**

**Table of Contents**

1 Introduction ..... 1  
    1.1 CEQA Process..... 1  
    1.2 Document Organization..... 1  
2 Agencies, Organizations and Persons Commenting on the Draft Environmental Impact Report ..... 2  
3 Responses to Comments Received on the Draft EIR ..... 3  
    3.1 Written Comments and Responses to Comments ..... 3  
    3.2 Oral Comments and Responses to Comments..... 8  
4 Revisions to the Draft Environmental Impact Report..... 10  
5 References..... 14

**Appendices**

Appendix A – Mitigation Monitoring and Reporting Program

Appendix B – Public Comments

Appendix C – Revised Cost Analysis for Scenario 1: No Project

# 1 Introduction

## 1.1 CEQA Process

On September 25, 2020, the County of Santa Clara (lead agency) released for public review a Draft Environmental Impact Report (Draft EIR) for the proposed former San José City Hall Project (SCH# 2020060451) pursuant to the requirements of the California Environmental Quality Act (CEQA). The 45-day public review and comment period on the Draft EIR began on September 25, 2020 and closed on November 9, 2020.

Section 15088(a) of the CEQA Guidelines states that:

*The lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.*

Accordingly, the County of Santa Clara (County) has evaluated the comments received on the Draft EIR for the former City of San José City Hall Project (the Project) and prepared written responses to comments involving significant environmental issues. CEQA does not require the lead agency to respond to comments about the merits of the proposed project unless they involve the Draft EIR's analysis of its environmental issues.

This Final EIR document, together with the Draft EIR as modified by Section 4 ("Revisions to the Draft Environmental Impact Report"), and the Mitigation Monitoring and Reporting Program attached as Appendix A, together constitute the Environmental Impact Report (EIR) for the Project. The EIR will become final upon certification by the County Board of Supervisors. Consequently, additional modifications to the EIR may be provided up until the time of certification.

Certification of the EIR as adequate and complete must take place before the County may approve the Project. Certification of the EIR as being complete is not approval of the Project; certification is required for ultimate project approval, but the approval is a separate action by the County.

## 1.2 Document Organization

This Final EIR is divided into the following sections and appendices:

- Section 1, "Introduction," describes the CEQA process and the organization of this document.
- Section 2, "Agencies, Organizations and Persons Commenting on the Draft EIR," lists all agencies, organizations and persons that submitted written or oral comments on the Draft EIR during the public review and comment period. The list also indicates the receipt date of each written correspondence.
- Section 3, "Comments Received and Responses to Comments," contains copies of each comment letter received during the public review period, followed by the County's response to each comment. Each comment letter and substantive comment within the letter are numbered, with corresponding responses similarly numbered. Verbal comments received during the public meeting held during the review period are summarized and responded to in turn.
- Section 4, "Revisions to the Draft Environmental Impact Report," contains text changes to the Draft EIR made in response to comments received on the Draft EIR or initiated by County staff.
- Section 5, "References," includes bibliographical details for any additional citations referenced within the Final EIR that were not included in the Draft EIR.

Appendix A, "Mitigation Monitoring and Reporting Program (MMRP)," describes the identified mitigation measures and the responsible parties, tasks, and schedule for monitoring mitigation compliance. Appendix B, "Public Comments" contains copies of written comments received during the Draft EIR public review period. Appendix C, "Revised Cost Analysis for Scenario 1: No Project" provides additional information referred to within the Final EIR.

## 2 Agencies, Organizations and Persons Commenting on the Draft Environmental Impact Report

In accordance with CEQA Guidelines Section 15088, this document includes written responses to email and letter comments regarding significant environmental issues received by the County on the Draft EIR during the public review period, as well as to oral comments from the public meeting held on October 14, 2020. Table 2-1 below lists all written comments received on the Draft EIR, and Table 2-2 lists all speakers at the public meeting. Each commenter is given a unique comment code, which is used in Section 3 of this document to identify individual subtopics raised by the commenters and the County's responses to those comments.

**Table 2-1: List of Written Comments Received on the Draft Environmental Impact Report**

<b>Commenter Code</b>	<b>Name of Commenter</b>	<b>Commenter Type</b>	<b>Comment Date</b>
PACSJ	Preservation Action Council of San José	Organization	11/09/2020

**Table 2-2: List of Oral Comments Received on the Draft Environmental Impact Report**

<b>Commenter Code</b>	<b>Name of Commenter</b>	<b>Commenter Type</b>	<b>Comment Date</b>
LEECH	Ben Leech, Preservation Action Council of San José	Organization	10/14/2020
SODERGREN	Mike Sodergren, Preservation Action Council of San José	Organization	10/14/2020

### 3 Responses to Comments Received on the Draft EIR

In accordance with CEQA Guidelines Section 15088, this document includes written responses to all comments regarding environmental issues received by the County on the Draft EIR during the public review period. Written comments are presented in Section 3.1, each followed by the County's response. Oral comments and the County's responses are presented in Section 3.2. Within each section, comments and associated responses are organized alphabetically, by commenter. See Section 2 of this document for a full list of all commenters.

#### 3.1 Written Comments and Responses to Comments

One written comment letter was received during the public review period, a copy of which is contained in Appendix B. The comment letter has been divided into individual comment topics requiring a response, e.g., the first topic raised in the letter is coded as [Commenter Code]-1, the second topic is coded as [Commenter Code]-2. The text of each comment topic is reproduced below, followed by the County's response to each comment topic, in turn.

##### 3.1.1 PACSJ: Preservation Action Council of San José

###### ***Written Comments***

- PACSJ-1: After reviewing the Draft Environmental Impact Report [DEIR] for the Former San Jose City Hall Project, the Preservation Action Council of San Jose [PAC\*SJ] strongly supports the environmentally superior “No Project” alternative that avoids the unnecessary demolition of the Former City Hall, an iconic San Jose Candidate City Landmark eligible for listing in the National Register of Historic Places and the California Register of Historical Resources. We also believe the DEIR lacks sufficient evidence to support the conclusion that demolition would achieve the stated project goal of reducing ownership costs associated with the property. We therefore urge the County of Santa Clara not to adopt the DEIR in its present form, to instead endorse the “No Project” alternative, and to continue to pursue adaptive reuse options for the landmark structure.
- PACSJ-2: CEQA Guidelines state that, in evaluating project alternatives, an EIR “shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project” (Guideline §15126.6(d)). As such, any meaningful comparison between demolition and preservation alternatives must include a detailed analysis of the costs associated with both demolition and preservation. We do not believe the DEIR meets this standard in its analysis of the project or its alternatives
- PACSJ-3: Most notably, while general cost estimates are provided for the various preservation alternatives explored in the DEIR, it fails to compare any of these with the actual cost of the proposed project itself. In other words, the DEIR claims that demolishing the building will save the County money in long-term maintenance costs without disclosing the short-term costs necessary to accomplish this goal. Nowhere in the DEIR itself are these figures identified or discussed, but the Feasibility Study Summary Matrix included in DEIR Appendix B cites a “Rough Order of Magnitude” estimate of \$5,743,410 for demolition of the existing structure (Cumming, p.3). The DEIR includes no analysis to either confirm or question the accuracy of this figure, but if taken at face value, would seem to far outweigh the costs of continued maintenance, which the DEIR estimates at \$171,300 annually.
- PACSJ-4: Furthermore, this annual \$171,300 cost estimate for the “No Project” preservation alternative is itself questionable, given the limited data provided in the DEIR to support it. Appendix B includes a table entitled “Former City Hall Building Costs Spent to Date” (p. 29). Total costs over this 8-year period between 2012 and 2019 averaged approximately \$101,000 annually—significantly less than the projected annual cost estimates \$171,300) of the “No Project” preservation alternative. What explains this? Furthermore,

## FINAL

this 8-year average is significantly inflated by a single outlying year, with \$314,399 spent in 2018. In contrast, only \$20,142 was spent in 2016, and four of the eight years had total costs around \$50,000 or less. No explanation for these significant deviations are included in the DEIR analysis, calling into question the accuracy of its future projections. For example, why were maintenance/custodial costs in 2018 (\$280,104) nearly three times higher than any other year, and is it reasonable to assume that equally high costs will continue to be incurred in the future? Why or why not? In addition, it is not clear whether some of these figures include costs associated with the former City Hall Annex, which was demolished in 2018- 19, or are limited strictly to the original and existing structure only.

- PAC SJ-5: Likewise, while the “No Project” preservation alternative reasonably envisions a one-time investment of \$490,200 to “mothball” the vacant building and protect it from accelerated deterioration, the DEIR provides no discussion or analysis of how this work might (or might not) reduce anticipated ownership costs into the future. Without this and other detailed analysis, the DEIR fails to adequately support the claim that demolition represents a cost-savings over the “No Project” preservation alternative.
- PAC SJ-6: In its review of Project Alternatives, the DEIR also includes numerous unsupported claims that “the useful life of the rehabilitated facility would be substantially shorter than the useful life of [new construction]” (AECOM pp. 180 and 192). Such claims require explanation and evidence not provided in the DEIR or its appendices.
- PAC SJ-7: A more accurate cost comparison between the various Project Alternatives should also include an analysis of potential Historic Tax Credits, Housing Tax Credits, and other potential redevelopment incentives, especially under redevelopment scenarios involving partnerships with a private developer. Such analysis is entirely absent from the DEIR.
- PAC SJ-8: In addressing the significant and unavoidable impacts of the proposed project, the DEIR rightly concludes that the demolition of the Former City Hall represents not only the loss of an individual historic resource, but also represents a significant cumulative impact to Mid-Century Modern architectural resources citywide. Given the Former City Hall’s outsized prominence in the history of San Jose and Santa Clara County, serving as the literal and figurative heart of the city’s postwar transformation into a suburban metropolis, its symbolic importance in the context of Midcentury Modernism in San Jose cannot be overstated. As such, any appropriate mitigation scope should address not only the building itself, but the larger context to which it significantly and uniquely contributes. Unfortunately, the DEIR proposes no specific mitigation measures to address this cumulative impact, proposing only a bare minimum program of documentation and commemoration of the individual resource (MM-CUL-1a-1e). Should the building’s demolition ultimately be approved, mitigation should include additional measures that directly support the preservation of other historic resources contributing to this broader architectural and historical context, including (but not limited to) support for a citywide inventory of Midcentury Modern resources (a major recommendation of the 2009 San Jose Modernism Context Statement by PAST Consultants, LLC).
- PAC SJ-9: PAC\* SJ appreciates this opportunity to comment on the Draft EIR for the Former San Jose City Hall Project and looks forward to continued constructive analysis of feasible preservation alternatives. San Jose lost its first City Hall—another irreplaceable civic icon—sixty-two years ago, when officials deemed its Victorian design to be obsolete and ugly. This decision robbed San Jose of what would surely be a beloved landmark today, yet we risk making an equally shortsighted judgment yet again with its successor.

# FINAL

## Response to Comments

PACCSJ-1: The commenter states support of the No Project Alternative and requests the County adopt the No Project Alternative and continue to pursue adaptive reuse options for the Former City Hall building. The commenter believes the DEIR lacks sufficient evidence to support the conclusion that demolition would achieve the stated project goal of reducing ownership costs associated with the property. The commenter's specific questions related to the County's ownership costs are presented in comments PACCSJ-2 through PACCSJ-6 below, and the County's responses to those comments are provided herein.

PACCSJ-2: The commenter states the alternatives analysis must include a detailed analysis of costs associated with both demolition and preservation of the Former City Hall building. CEQA Guidelines Section 15126.6(d) requires sufficient information about each alternative to allow meaningful comparison of the "significant *environmental* effects" of each alternative as compared to the proposed project. (See also *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490 ["nothing in CEQA requir[es] an EIR to discuss the economic feasibility of a project, noting that as its very name makes evident, an EIR is an *environmental* impact report—an informational document. CEQA requires an EIR to identify project alternatives and to indicate the manner in which a project's significant effects may be mitigated or avoided, but does not mandate that the EIR itself contain an analysis of the feasibility of the various project alternatives or mitigation measures that it identifies."].) Furthermore, CEQA Guidelines Section 15126.6(d) notes that a "detailed analysis" is not required, stating that the alternatives may be discussed "in less detail than the significant effects of the project as proposed." Nevertheless, the Draft EIR provides substantial financial information and analysis regarding the costs of the various alternatives, including the costs to preserve the Former City Hall building and the costs of alternative potential development scenarios. See DEIR Sections 4.3.2, 4.3.3 and 4.3.4 and Appendix B (Feasibility Study and Cost Estimates). See also Responses to Comments PACCSJ-3 and PACCSJ-4.

While financial costs of the project or alternatives will be an important consideration for the County when reviewing the alternatives and understanding their feasibility, an EIR is not intended to address social or economic impacts of a project, but rather to understand a project's environmental impacts and how those impacts might be avoided or mitigated by the project alternatives (CEQA Guidelines Sections 15131(a) and 15382). Economic and social factors may be considered by public agencies together with technological and environmental factors in deciding whether any of the project alternative are a feasible way to reduce or avoid the significant effects on the environment identified in the EIR. The information upon which an agency's feasibility determination is based may be contained in the EIR or elsewhere in the administrative record for the project. It is expected that additional information regarding the feasibility of project alternatives will be provided to the County's Historical Heritage Commission and Board of Supervisors in association with their consideration of the proposed Project. See also Response to Comment PACCSJ-3.

PACCSJ-3: The commenter states that the Draft EIR includes no analysis to either confirm or question the accuracy of the estimated cost to demolish the Former City Hall provided in Appendix B, and the commenter further states that the cost for demolition would outweigh the costs of continued maintenance, which Appendix B of the Draft EIR estimated at \$171,300 annually.

As noted in Response to Comment PACCSJ-2, while financial costs of the Project and alternatives will be a consideration for the County when reviewing the alternatives and understanding their feasibility, the purpose of the EIR is to address the environmental impacts of the Project. The costs of building demolition are not related to the environmental impacts of the Project.

The feasibility report, included as Appendix B of the Draft EIR, included an estimated one-time cost for demolition of the building of approximately \$5.74 million (Cumming

## FINAL

2020, page 2), although the actual cost of demolition will depend in part on the outcome of additional pre-demolition investigations of the structure, including the quantity of hazardous materials abatement and disposal that would be required. The County also has not yet solicited bids for demolition of the former City Hall building, and therefore a more detailed cost estimate for demolition is not feasible at this stage.

In response to this comment, the County conducted further investigations regarding the County's historic operations and maintenance ("O&M") and utility costs for the Facility. This additional investigation revealed that the County's average O&M costs for the 2016-2021 period were \$96,452 per year, and the utility costs for the same period were estimated at \$33,408 per year. Staff asked Cumming to redo the cost analysis for Alternative 1 to reflect this data. During that effort, Cumming also discovered that it had failed to apply the 3% inflation factor to the annual O&M and utility costs. Cumming's revised cost analysis revealed that the 30-year total cost of ownership (present value) is \$3.9 million instead of \$4.4 million as stated in the 2020 Feasibility Study. The \$3.9 million represents the *present value* of the \$6.9 million estimated cost of maintaining and securing the building over 30 years, including initial one-time stabilization costs of \$490,200, and the total annual maintenance and utilities costs of \$6.4 million over the 30-year period. The present value was calculated by using an annual 4% discount rate. The results of the revised Cumming analysis and an explanation of the methodology and data sources upon which it is based are provided in Appendix B.

PACCSJ-4: The commenter questions the accuracy of the total past and future maintenance costs of the Former City Hall presented in Appendix B of the Draft EIR and questions if the former City Hall Annex was included in the maintenance estimates. As explained in the Response to Comment PACCSJ-2, information about the financial costs of the Project or its alternatives is not required to be included within the EIR as this information does not pertain to the environmental impacts of the Project or the project alternatives.

The County has records of the maintenance, utility, and security costs for the Former City Hall facility since taking ownership of the building in 2011. The Draft EIR provides a summary of these costs, which are for the Former City Hall building only, and do not include costs associated with the former Annex building. Detailed information about these historic costs is provided in Appendix B of this Final EIR. As noted by the commenter, past costs of ongoing maintenance and security for the facility have been variable. This variability is due to the reactive nature of some previous repairs and maintenance activities in response to events or identified needs, such as storm damage, vandalism, leaks or safety concerns. For example, a fire near the building in fall 2020 caused damage to the connecting utility systems, utility shed, and an entrance and exits.

Similar to the historic costs, the estimated future maintenance costs are also anticipated to vary year to year. The updated \$100,000 per year figure is an estimated average for the 30-year period based on the County's past costs. As time passes, the County anticipates the frequency and/or extent of required repairs to increase, due to the increasing age of the building and its components. But predicting future cost increases would be speculative, so the County and its consultants used existing annual costs for analysis purposes.

Estimated ongoing costs for the No Project Alternative would include utilities, preventative maintenance, and "business as usual" continuation of reactive maintenance and security, as well as additional one-time and ongoing mothballing treatments to protect the building from damage and deterioration. Mothballing treatment would include obtaining an updated conditions assessment, undertaking stabilization and security measures, providing adequate ventilation, repairing leaks and other deficiencies, performing ongoing monthly observations and correcting any identified problems, and conducting inspections following heavy rains or other events that could cause damage (Gensler 2020, page 7; Cumming 2020, pages 5-6).

## FINAL

PACSJ-5: The commenter states that while the “No Project” alternative reasonably envisions a one-time investment of \$490,200 to “mothball” the vacant building and protect it from accelerated deterioration, the Draft EIR provides no discussion or analysis of how this work might (or might not) reduce anticipated ownership costs into the future and that the Draft EIR does not support the claim that demolition represents a cost savings over the No Project Alternative.

Under the No Project Alternative, the County would be required to spend \$490,200 for initial mothballing activities in addition to continuing to pay for ongoing maintenance, utilities and security for the facility in perpetuity. As explained in the Response to Comment PACSJ-4, the total cost over 30 years has been revised and is estimated at \$3.9 million (Draft EIR, p. 174 and Appendix. B, Gensler 2020; Final EIR, Appendix C, Cumming 2021). See also Response to Comment PACSJ-2.

PACSJ-6: The commenter states that the Draft EIR does not include sufficient explanation and evidence to support the statement that “the useful life of the rehabilitated facility would be substantially shorter than the useful life of [new construction].”

Under Alternative 1 (Office Re-Use), the building would undergo repair and recommissioning of those items necessary to make the building fit for occupancy, however a full seismic upgrade or replacement of the existing curtain wall, brick veneer, or building foundation would not be undertaken. Therefore, the majority of the building’s original, over 60-year-old steel, brick, and concrete components would remain. Among other things, an evaluation of the facility undertaken in 2012 (BFCG-IBI Group 2012) identified “staining and corrosion of the steel framing [of the curtain walls], indicating a history of leakage and degradation to the steel frame,” and “efflorescence is visible in the brick.” Such degradation is anticipated to continue under Alternative 1, as such components would not be replaced. The County generally considers the useful life of its general government buildings to be 50 years (County 2018, p. 56). The IRS depreciates commercial structures over a 39-year period and reduces this period to 31.5 years if the structure was placed in service prior to May 1993 (IRS 2020, p. 32).

PACSJ-7: The commenter states that the Project alternatives should include an analysis of potential Historic Tax Credits, Housing Tax Credits, and other potential redevelopment incentives, especially under redevelopment scenarios involving partnerships with a private developer.

As noted above in response to Comment PACSJ-2, the purpose of the alternatives analysis within an EIR is to assess the environmental impacts of possible alternatives to the project that might reduce or avoid the project’s significant environmental impacts. A detailed discussion of potential historic tax credits, housing tax credits, or other potential redevelopment incentives is not pertinent to the analysis of physical environmental effects, and therefore need not be included in the EIR. Furthermore, in the more than ten years that the County has owned the facility, no developers have approached the County to propose that the Former City Hall building be redeveloped with the use of tax credits or other redevelopment incentives.

PACSJ-8: The commenter states that the cumulative analysis and mitigation should address not only the loss of the Former City Hall building itself, but also the larger context to which it significantly and uniquely contributes. In response to this comment, the County has included additional measures to address this wider architectural and historical context. Revisions have been made to mitigation measures MM-CUL-1a to MM-CUL-1e, and a new measure MM-CUL-1f has been added, as presented Section 4 of this Final EIR, “Revisions to the Draft Environmental Impact Report.”

The new measure MM-CUL-1f is based on the “suggestions for further research” identified within the San José Modernism Historic Context Statement (PAST 2009). These edits do not change the analysis or conclusions of the Draft EIR. Rather, these revisions provide additional details to the existing mitigation measures to address the

## FINAL

project's cumulative impact to historic resources. Although implementation of MM-CUL-1f would improve knowledge and enhance documented records regarding the modernism in San José, the project-level and cumulative impact to historic resources would remain significant and unavoidable.

PACCSJ-9: The commenter states appreciation for the opportunity to comment on the Draft EIR. The County acknowledges and thanks the commenter for providing comments on the Draft EIR and suggestions for additional mitigation measures to address impacts to historic resources. As noted in Response to Comment PACCSJ-2, further information regarding the County's determination regarding the feasibility of project alternatives will be provided as the Project is considered by the County Historical Heritage Commission and Board of Supervisors.

### 3.2 Oral Comments and Responses to Comments

Oral comments received at the public meeting on October 14, 2020 are summarized below for each commenter, with each individual comment topic requiring a response coded in the same manner as previously described, followed by the County's response to those comments.

#### 3.2.1 LEECH: Ben Leech, Preservation Action Council of San José

##### **Summary of Oral Comments**

- LEECH-1: Appreciates that the previous recommendations of the Preservation Action Council of San José (PACCSJ) regarding alternatives were considered in the EIR.
- LEECH-2: Requests information regarding estimated cost of building demolition, so that the public and decision makers can compare to costs of ongoing maintenance and security.
- LEECH-3: Requests that additional information regarding costs of ongoing maintenance of the former City Hall building be provided. Maintenance costs in the Gensler report averaged \$100,000 per year, but were highly variable, from as low as \$20,000 to as high as \$300,000 in some years. Would like additional information on why these costs varied year to year and what improvements were done in previous years that might affect ongoing maintenance costs.

##### **Response to Comments**

- LEECH-1: The County acknowledges the comment and thanks the commenter for providing input during the earlier scoping period to help inform the identification and analysis of alternatives in the Draft EIR.
- LEECH-2: Please see Response to Comment PACCSJ-3.
- LEECH-3: Please see Responses to Comments PACCSJ-3 and PACCSJ-4.

#### 3.2.2 SODERGREN: Mike Sodergren, Preservation Action Council of San José

##### **Summary of Oral Comments**

- SODERGREN-1: Reiterates and supports Ben Leech's oral comments.
- SODERGREN-2: Former City Hall is a treasure of Mid-Century Modernism that is characteristic of San José. It is the first modern-era City Hall of San José.
- SODERGREN-3: Doesn't want to see the former City Hall demolished, leaving a bare site for an undetermined period.

## FINAL

SODERGREN-4: Would like to see the building remain until it can be redeveloped with an adaptive reuse that highlights San José's Mid-Century Modernist history.

### ***Response to Comments***

SODERGREN-1: See responses to comments LEECH-1 through LEECH-3, in Section 3.2.1 above.

SODERGREN-2: The importance of the former City Hall in the context of San José's Mid-Century Modern history is described in Section 3.4 of the Draft EIR, and is acknowledged in the identification of a significant and unavoidable impact to historic resources at both the project level and on a cumulative basis. No changes to the Draft EIR are necessary in response to this comment; however, the measures for cultural resources (Mitigation Measures MM-CUL-1a through 1f) have been refined and augmented as explained in Response to Comment PACSJ-8 to address the project's cumulative impact to historic resources (although the cumulative impact remains significant and unavoidable).

SODERGREN-3: Although no future use of the project site is identified in the Draft EIR or proposed by County at this time, the proposed demolition of the former City Hall would not "leave a bare site." Following completion of demolition activities, the area would be vegetated to match the existing garden setting of the wider area surrounding the former City Hall, in effect extending the existing landscaped plaza area that is currently present between the former City Hall and the County's East Wing building, as discussed in Sections 2.4.1 and 2.4.2 of the Draft EIR.

SODERGREN-4: Various adaptive reuses of the former City Hall building were considered and analyzed as Alternatives to the Project, as described in Section 4 of the Draft EIR. In addition to adaptive reuse as office space (Alternative 1) and as residential apartments (Alternative 2), which were analyzed in detail in Section 4.3 of the Draft EIR, the County also considered other options as outlined in Section 4.2. The commenter's suggestion for adaptive reuse alternatives is noted. The decision to approve or deny the project or one of its alternatives will be made by the County Board of Supervisors.

## 4 Revisions to the Draft Environmental Impact Report

This section contains revisions to the text of the former City of San José City Hall Draft EIR dated September 25, 2020. These revisions include both (1) revisions made in response to comments on the Draft EIR, as discussed in Section 3 of this Final EIR, and (2) County staff-initiated text changes to correct minor inconsistencies, to add minor updates to information or clarification related to the Project, and to provide updated information where applicable. Revised or new language is underlined. All deletions are shown in ~~strike through~~. The County finds that these revisions do not trigger the need for recirculation under CEQA Guidelines Section 15088.5.

Mitigation Measure MM-BIO-4, presented in Section 3.4.2 (as well as within Table ES-1) of the Draft EIR is proposed to be amended as follows, as a staff-initiated change:

### **MM-BIO-4: Nesting Bird Avoidance Measures**

To the extent practicable, demolition activities and any tree trimming/removal shall be performed from September 16 through January 14 to avoid the general nesting period for birds. If demolition or construction cannot be performed during this period, nesting bird surveys and active nest buffers (as necessary) will be implemented as follows:

- Nesting Bird Surveys: If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist will conduct two surveys for active nests of such birds within 14 days prior to the beginning of project construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding the work area are typically the following: i) 50 feet for passerines; ii) 300 feet for raptors. Surveys should be conducted at the appropriate times of day and during appropriate nesting times, as determined by the qualified biologist.
- Active Nest Buffers: If the qualified biologist documents active nests within the project area or in nearby surrounding areas, an appropriate buffer between the nest and active construction should be established. The buffer should be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist should conduct baseline monitoring of the nest to characterize “normal” bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist should monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g. defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman should have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active.

The mitigation measures for cultural historic resource impacts, presented within Section 3.4.3 (as well as within Table ES-1) of the Draft EIR are proposed to be amended as follows, in response to comment PACSJ-8:

### **MM-CUL-1a: Historical Resource Mitigation Plan**

Prior to issuance of any grading, demolition, or building permits or any other approval that would allow disturbance of the Project site, an SOI-qualified Architectural Historian/Historic Architect shall prepare a Historical Resource Mitigation Schedule (Mitigation Schedule) demonstrating that the requirements listed in mitigation measures MM-CUL-1b, MM-CUL-1c, MM-CUL-1d, ~~and MM-CUL-1e, and MM-CUL-1f~~ have been satisfied in accordance with the Mitigation Schedule. The Mitigation Schedule shall include a plan and schedule for the implementation of mitigation measures and describe the roles and responsibilities of the County, qualified consultants, and third parties. The Mitigation Schedule shall be supplemented with an addendum that documents the implementation of the following mitigation measures, once completed.

### **MM-CUL-1b: Archival Documentation (HABS)**

Former City Hall and its associated features on the Project site, and its wider importance in the context of San José Modernism, shall be documented by the County in accordance with the

## FINAL

guidelines established for a Level III Historic American Building Survey (HABS) consistent with the SOI Standards for Architectural and Engineering Documentation and shall consist of the following components:

- Drawings – Sketch floor plans.
- Photographs – Digital photographs of the interior, exterior, and setting of the building in compliance with the National Register Photo Policy Fact Sheet (National Park Service 2013).
- Written Data – HABS written documentation.

An SOI-qualified Architectural Historian/Historic Architect shall oversee the preparation of the sketch plans, photographs, research and written data. The Level III HABS-equivalent documentation shall cover the former City Hall building along with associated features, spaces, and landscaping.

The draft documentation shall be submitted to the County Department of Planning and Development for review and approval. After approval, full archival-quality copies of the final Level III HABS-equivalent documentation shall be filed with the County and the San José Library's California Room. Additional print copies shall be made available to other local research institutions including History San José, the Preservation Action Council of San José, and the Northwest Information Center at Sonoma State University. Documentation of the implementation of MM-CUL-1b shall be included in the addendum to the Mitigation Schedule.

### **MM-CUL-1c: Offer for Third Party Relocation**

Prior to issuance of any demolition permits, the County shall advertise the availability of the building for relocation by an interested third party for a period of no less than 60 days. The advertisements must include notification in a newspaper of general circulation, on a website, and notice placed on the Project site. The County shall provide evidence (i.e., receipts, date and time stamped photographs, etc.) that this condition has been met prior to the issuance of demolition permits. If a third party agrees to relocate the building, the following measures must be followed:

- The County must determine that the receiver site is feasible for the building.
- Prior to relocation, the third party shall hire a historic preservation architect and a structural engineer to undertake an existing condition study that establishes the baseline condition of the building prior to relocation. The documentation shall take the form of written descriptions and visual illustrations, including those character-defining physical features of the resource that convey its historic significance and must be protected and preserved. The documentation shall be reviewed and approved by the County prior to the structure being moved.
- To protect the building during relocation, the third party shall engage a building mover who has experience moving similar historic structures. A structural engineer shall also be engaged to determine how the building needs to be reinforced/stabilized before the move.
- Once moved, the building shall be repaired and rehabilitated, as needed, by the third party in conformance with the SOI Standards for the Treatment of Historic Properties. In particular, the character-defining features shall be retained in a manner that preserves the integrity of the building for the long-term preservation and reuse.
- Upon completion of the repairs, an SOI-qualified Architectural Historian/Historic Architect shall document and confirm that work to the structure(s) was completed in conformance with the SOI Standards for the Treatment of Historic Properties and that character-defining features were preserved. Documentation of the implementation of MM-CUL-1c shall be included in the addendum to the Mitigation Schedule.

### **MM-CUL-1d: Architectural Salvage**

If no third party agrees to relocate the building in compliance with MM-CUL-1c, the building shall be made available for salvage to salvage companies facilitating the reuse of historic building materials. The time frame available for salvage shall be established by the County in accordance with the Mitigation Schedule. The County shall verify that this condition has been met prior to demolition. Documentation of the implementation of MM-CUL-1d, if necessary, shall be included in the addendum to the Mitigation Schedule.

### **MM-CUL-1e: Commemoration and Interpretive Program**

## FINAL

Former City Hall and its associated features on the Project site shall be commemorated and curated in an interpretive program that may include:

- Physical remnants from the site
- Oral histories
- Additional research
- Historic photographs
- Historic maps
- Historical displays
- Historical marker

Details of the commemoration and interpretive program, including identification of appropriate location(s) for display and/or circulation of program materials, shall be determined by the County in consultation with the County Historical Heritage Commission. Documentation of the implementation of MM-CUL-1e shall be included in the addendum to the Mitigation Schedule.

### **MM-CUL-1f: Supplemental San José Modernism Documentation Program**

Knowledge of San José Modernism (1935-1975) as embodied in government, office, and industrial structures shall be enriched in a documentation program that would expand information on local practitioners of modernism of these types of structures and shall include:

- Consultation with the American Institute of Architects Silicon Valley (AIA SV) to identify Modernist (1935-1975) government, office, and industrial structures;
- Compilation of archival documentation from AIA SV and other sources for each identified structure; and
- Preparation of a Historic American Buildings Survey (HABS) short format history for each identified structure.

Details of the supplemental documentation program, including identification of appropriate location(s) for display and/or circulation of program materials, shall be determined by the County in consultation with the County Historical Heritage Commission, the Preservation Action Council of San José, and other interested parties. Documentation of the implementation of MM-CUL-1f shall be included in the Mitigation Schedule addendum under MM-CUL-1a .

In addition, all cross-references throughout the Draft EIR to mitigation measures “MM-CUL-1a through MM-CUL-1e” shall be revised to “MM-CUL-1a through MM-CUL-1f” to reflect the changes described above.

The mitigation measures for cultural historic resource impact CUL-2, presented within Section 3.4.3 (as well as within Table ES-1) of the Draft EIR are proposed to be amended as follows to clarify that they are only applicable to previously unrecorded resources, and would not apply to the former City Hall.

### **MM-CUL-2: Inadvertent Discoveries**

In the event that previously unrecorded prehistoric or historic resources are encountered during demolition, excavation and/or grading of the site, all activity within a 50-foot radius of the find shall be stopped, the County Project Manager or designee shall be notified, and a qualified archaeologist shall examine the find. The archaeologist shall:

31) evaluate the find(s) to determine if they meet the definition of a historical or archaeological resource; and

42) make appropriate recommendations regarding the disposition of such finds prior to issuance of building permits.

If the finds do not meet the definition of a historical or archaeological resource, no further study or protection is necessary prior to resuming project implementation. If the find(s) does meet the definition of a historical or archaeological resource, then it should be avoided by project activities. If avoidance is not feasible, adverse effects to such resources should be mitigated in accordance with the recommendations of the archaeologist. Recommendations could include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery would be submitted to the Director of Planning. If the find(s) are human

## FINAL

remains or grave goods, the procedures outlined in County Ordinance Code B6-18 through BC-20 shall be followed.

Project personnel should not collect or move any cultural material. Fill soils that may be used for construction purposes should not contain archaeological materials.

The discussion of the No Project Alternative in Section 4.3.1 (last paragraph on page 174) is revised to read as follows:

### ***Ability of Alternative to Meet Project Objectives***

Although the one-time stabilization activities and ongoing maintenance activities would be undertaken in a safe, cost-effective, environmentally responsible manner (Objective 2), and the site would be maintained in a clean and safe condition (Objective 3), the No Project Alternative would increase, rather than reduce, the County's ongoing maintenance and security costs associated with the site. The one-time costs of undertaking the required stabilization activities required to "mothball" the facility are estimated at approximately ~~\$490,200~~ ~~\$490,000~~, and the total cost over 30 years is estimated at ~~\$3.9~~ ~~\$4.4~~ million (Gensler 2020, ~~Cumming 2020~~, ~~see Draft EIR Appendix B; Cumming 2021, Final EIR Appendix C~~). Therefore, the No Project Alternative would not meet Objective 1.

## 5 References

- BFCG-IBI Group. July 2012. Evaluation of the Former San José City Hall Building Evaluation Analysis. Available at: <https://ffd.sccgov.org/sites/g/files/exjcpb1051/files/Re-use%20Study.pdf>
- County of Santa Clara. 2018. County of Santa Clara Controller-Treasurer Department, Fixed Assets Administrative Guide (Sept. 2018), Attachment C.
- Cumming. 2020. CoSC Former City Hall Feasibility Study. Rough Order of Magnitude. March 31. Copy contained in Appendix B of the Draft EIR.
- Cumming. 2021. CoSC Former City Hall Feasibility Study. Rough Order of Magnitude. October 21. Copy contained in Appendix C of the Final EIR.
- Gensler. 2020. Former City Hall Feasibility Study, Alternatives and Cost Implications, Spring 2020. Copy contained in Appendix B of the Draft EIR.
- Internal Revenue Service. 2020. IRS Publication 946. Available at <https://www.irs.gov/pub/irs-pdf/p946.pdf>.
- PAST Consultants, LLC. 2009. Historic Context Statement for San José Modernism. Prepared for the Preservation Action Council of San José. Available at: <https://www.sanjoseca.gov/home/showpublisheddocument/24017/636689747655430000>

FINAL

# Appendix A – Mitigation Monitoring and Reporting Plan

## FINAL

# Mitigation Monitoring and Reporting Program – Former San José City Hall Project

Where a CEQA document has identified significant environmental effects, Public Resources Code Section 21081.6 requires public agencies to adopt a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of a project approval to mitigate or avoid significant effects on the environment.”

A public agency is required to ensure that the measures are fully enforceable, through permit conditions, agreements, or other means (Public Resources Code Section 21081.6(b)). A Mitigation Monitoring and Reporting Program (MMRP) must be designed to ensure project compliance with mitigation measures during project implementation.

The County of Santa Clara is the lead agency that must adopt an MMRP for development of the project – the demolition of the Former San José City Hall. This MMRP has been prepared to provide for the monitoring of mitigation measures required of the proposed project, as set forth in the Final EIR. This MMRP addresses those measures in terms of how and when they will be implemented.

This MMRP identifies the individual mitigation measures included in the Final EIR and is presented in Table 1. Key features of the table are briefly described below:

- Monitoring and Reporting Action identifies the outcome from implementation of mitigation measures.
- Implementation Timeframe provides the general schedule for conducting each mitigation task.
- Implementation Responsibility identifies the person/group responsible for implementation of the mitigation measure.
- Implementation Oversight assigns the responsibility for verifying compliance with each mitigation measure and reporting task.
- Verification of Compliance documents the person who verified implementation of the mitigation measure and the date on which this verification occurred.

**FINAL**

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
<p><b>M-AIR-2: Fugitive Dust Reduction Measures</b></p> <p>The construction contractor shall comply with the following BAAQMD BMPs for reducing construction emissions of uncontrolled fugitive dust (PM10 and PM2.5):</p> <ul style="list-style-type: none"> <li>a) All exposed surfaces (e.g., parking areas, staging areas, soil piles, stockpiles, graded areas, and unpaved access roads) shall be watered twice daily, or as often as needed, treated with non-toxic soil stabilizers, or covered to control dust emissions. Watering should be sufficient to prevent airborne dust from the leaving the site.</li> <li>b) All haul trucks transporting soil, sand, or other loose material off site shall be covered.</li> <li>c) All visible mud or dirt track-out onto adjacent public roads and paved access roads shall be removed using wet power (with reclaimed water, if possible) vacuum street sweepers at least once per day, or as often as needed. The use of dry power sweeping is prohibited.</li> <li>d) All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.</li> <li>e) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</li> <li>f) Idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by California airborne toxics control measure Title 13, Section 2485 of the California Code of Regulations). Clear signage shall be provided for construction workers at all access points.</li> <li>g) All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.</li> <li>h) A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD’s phone number also shall be visible to ensure compliance with applicable regulations.</li> </ul> <p>The County of Santa Clara project manager or his/her designee shall verify compliance that these measures have been implemented during normal construction site inspections.</p>	<p>Review and approve construction specifications with inclusion of fugitive dust reduction measures</p>	<p>During demolition and construction</p>	<p>Construction contractor</p>	<p>Santa Clara County Facilities and Fleet Department</p>	
<p><b>MM-BIO-4: Nesting Bird Avoidance Measures</b></p> <p>To the extent practicable, demolition activities and any tree trimming/removal shall be performed from September 16 through January 14 to avoid the general nesting period for birds. If demolition or construction cannot be performed during this period, nesting bird surveys and active nest buffers (as necessary) will be implemented as follows:</p> <ul style="list-style-type: none"> <li>• Nesting Bird Surveys: If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist will conduct two surveys for active nests of such birds within 14 days prior to the beginning of project construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding the work area are typically the following: i) 50 feet for passerines; ii) 300 feet for raptors. Surveys should be conducted at the appropriate times of day and during appropriate nesting times, as determined by the qualified biologist.</li> <li>• Active Nest Buffers: If the qualified biologist documents active nests within the project area or in nearby surrounding areas, an appropriate buffer between the nest and active construction should be established. The buffer should be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist should conduct baseline monitoring of the nest to characterize “normal” bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist should monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman should have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active.</li> </ul>	<p>Verify nesting bird surveys have been conducted if demolition and tree trimming/removal activities occur during the nesting period (September 16 through January 14) and active nest buffers have been established, if necessary</p>	<p>Prior to demolition and tree trimming/removal activities during the nesting period (September 16 through January 14)</p>	<p>Construction contractor</p> <p>Qualified biologist designs and conducts surveys and establishes buffers</p>	<p>Santa Clara County Facilities and Fleet Department</p>	
<p><b>MM-CUL-1a: Historical Resource Mitigation Plan</b></p> <p>Prior to issuance of any grading, demolition, or building permits or any other approval that would allow disturbance of the Project site, an SOI-qualified Architectural Historian/Historic Architect shall prepare a Historical Resource Mitigation Schedule (Mitigation Schedule) demonstrating that the requirements listed in mitigation measures MM-CUL-1b, MM-CUL-1c, MM-CUL-1d, MM-CUL-1e, and MM-CUL-1f have been satisfied in accordance with the Mitigation Schedule. The Mitigation Schedule shall include a plan and schedule for the implementation of mitigation measures and describe the roles and responsibilities of the County, qualified consultants, and third parties. The Mitigation Schedule shall be supplemented with an addendum that documents the implementation of the following mitigation measures, once completed.</p>	<p>Verify the Historical Resource Mitigation Schedule includes a plan and schedule for the implementation of mitigation measures and describe the roles and responsibilities of the County, qualified consultants, and third parties</p>	<p>Prior to issuance of grading, demolition, or building permits or any other approval that would allow disturbance of the Project site</p>	<p>Santa Clara County Facilities and Fleet Department retains a Secretary of Interior-qualified Architectural Historian/Historic Architect</p> <p>The qualified professionals prepare a</p>	<p>Santa Clara County Planning and Development Department</p>	

**FINAL**

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
			Historical Resource Mitigation Schedule		
<p><b>MM-CUL-1b: Archival Documentation (HABS)</b> Former City Hall and its associated features on the Project site, and its wider importance in the context of San José modernism, shall be documented by the County in accordance with the guidelines established for a Level III Historic American Building Survey (HABS) consistent with the SOI Standards for Architectural and Engineering Documentation and shall consist of the following components:</p> <ul style="list-style-type: none"> <li>• Drawings – Sketch floor plans.</li> <li>• Photographs – Digital photographs of the interior, exterior, and setting of the building in compliance with the National Register Photo Policy Fact Sheet (National Park Service 2013).</li> <li>• Written Data – HABS written documentation.</li> </ul> <p>An SOI-qualified Architectural Historian/Historic Architect shall oversee the preparation of the sketch plans, photographs, research and written data. The Level III HABS-equivalent documentation shall cover the former City Hall building along with associated features, spaces, and landscaping.</p> <p>The draft documentation shall be submitted to the County Department of Planning and Development for review and approval. After approval, full archival-quality copies of the final Level III HABS-equivalent documentation shall be filed with the County and the San José Library’s California Room. Additional print copies shall be made available to other local research institutions including History San José, the Preservation Action Council of San José, and the Northwest Information Center at Sonoma State University. Documentation of the implementation of MM-CUL-1b shall be included in the addendum to the Mitigation Schedule.</p>	<p>Verify documentation and materials are placed on file with the County and the San José Library’s California Room and print copies are available to other local research institutions including History San José, the Preservation Action Council of San José, and the Northwest Information Center at Sonoma State University</p>	<p>Prior to issuance of grading, demolition, or building permits</p>	<p>Santa Clara County Facilities and Fleet Department retains a Secretary of Interior-qualified Architectural Historian/Historic Architect</p> <p>The qualified professionals prepare Level III HABS documentation</p>	<p>Santa Clara County Planning and Development Department</p>	
<p><b>MM-CUL-1c: Offer for Third Party Relocation</b> Prior to issuance of any demolition permits, the County shall advertise the availability of the building for relocation by an interested third party for a period of no less than 60 days. The advertisements must include notification in a newspaper of general circulation, on a website, and notice placed on the Project site. The County shall provide evidence (i.e., receipts, date and time stamped photographs, etc.) that this condition has been met prior to the issuance of demolition permits. If a third party agrees to relocate the building, the following measures must be followed:</p> <ul style="list-style-type: none"> <li>• The County must determine that the receiver site is feasible for the building.</li> <li>• Prior to relocation, the third party shall hire a historic preservation architect and a structural engineer to undertake an existing condition study that establishes the baseline condition of the building prior to relocation. The documentation shall take the form of written descriptions and visual illustrations, including those character-defining physical features of the resource that convey its historic significance and must be protected and preserved. The documentation shall be reviewed and approved by the County prior to the structure being moved.</li> <li>• To protect the building during relocation, the third party shall engage a building mover who has experience moving similar historic structures. A structural engineer shall also be engaged to determine how the building needs to be reinforced/stabilized before the move.</li> <li>• Once moved, the building shall be repaired and rehabilitated, as needed, by the third party in conformance with the SOI Standards for the Treatment of Historic Properties. In particular, the character-defining features shall be retained in a manner that preserves the integrity of the building for the long-term preservation and reuse.</li> </ul> <p>Upon completion of the repairs, an SOI-qualified Architectural Historian/Historic Architect shall document and confirm that work to the structure(s) was completed in conformance with the SOI Standards for the Treatment of Historic Properties and that character-defining features were preserved. Documentation of the implementation of MM-CUL-1c shall be included in the addendum to the Mitigation Schedule.</p>	<p>Verify the County has advertised the availability of the building for relocation by an interested third party for a period of no less than 60 days</p> <p>If a third party agrees to relocate the building, verify that all the specified measures are undertaken and documented.</p>	<p>At least 60 days prior to issuance of demolition permits</p>	<p>Santa Clara County Facilities and Fleet Department advertises the building’s availability.</p> <p>Third party retains a historic preservation architect, structural engineer, and building mover.</p> <p>Santa Clara County Facilities and Fleet Department retains a Secretary of Interior-qualified Architectural Historian/Historic Architect</p> <p>Qualified professional confirms and documents that relocation and rehabilitation meet SOI standards.</p>	<p>Santa Clara County Planning and Development Department</p>	
<p><b>MM-CUL-1d: Architectural Salvage</b> If no third party agrees to relocate the building in compliance with MM-CUL-1c, the building shall be made available for salvage to salvage companies facilitating the reuse of historic building materials. The time frame available for salvage shall be established by the County in accordance with the Mitigation Schedule. The County shall verify that this condition has been met prior to demolition. Documentation of the implementation of MM-CUL-1d, if necessary, shall be included in the addendum to the Mitigation Schedule.</p>	<p>Verify building materials from the site have been made available for salvage to salvage companies</p>	<p>Prior to demolition activities</p>	<p>Santa Clara County Facilities and Fleet Department</p>	<p>Santa Clara County Planning and Development Department</p>	

**FINAL**

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
<p><b>MM-CUL-1e: Commemoration and Interpretive Program</b></p> <p>Former City Hall and its associated features on the Project site shall be commemorated and curated in an interpretive program that may include:</p> <ul style="list-style-type: none"> <li>• Physical remnants from the site</li> <li>• Oral histories</li> <li>• Additional research</li> <li>• Historic photographs</li> <li>• Historic maps</li> <li>• Historical displays</li> <li>• Historical marker</li> </ul> <p>Details of the commemoration and interpretive program, including identification of appropriate location(s) for display and/or circulation of program materials, shall be determined in consultation with the County Historical Heritage Commission. Documentation of the implementation of MM-CUL-1e shall be included in the addendum to the Mitigation Schedule.</p>	Verify preparation of an interpretive program	Post-demolition, in accordance with the Mitigation Schedule developed under MM-CUL-1a.	Santa Clara County Facilities and Fleet Department	Santa Clara County Planning and Development Department	
<p><b>MM-CUL-1f: Supplemental San José Modernism Documentation Program</b></p> <p>Knowledge of San José Modernism (1935-1975) as embodied in government, office, and industrial structures shall be enriched in a documentation program that would expand information on local practitioners of modernism of these types of structures and shall include:</p> <ul style="list-style-type: none"> <li>• Consultation with the American Institute of Architects Silicon Valley (AIA SV) to identify Modernist (1935-1975) government, office, and industrial structures;</li> <li>• Compilation of archival documentation from AIA SV and other sources for each identified structure; and</li> <li>• Preparation of a Historic American Buildings Survey (HABS) short format history for each identified structure.</li> </ul> <p>Details of the supplemental documentation program, including identification of appropriate location(s) for display and/or circulation of program materials, shall be determined by the County in consultation with the County Historical Heritage Commission, the Preservation Action Council of San José, and other interested parties. Documentation of the implementation of MM-CUL-1f shall be included in the Mitigation Schedule addendum under MM-CUL-1a .</p>	Verify preparation of a documentation program	Post-demolition, in accordance with the Mitigation Schedule developed under MM-CUL-1a.	Santa Clara County Facilities and Fleet Department	Santa Clara County Planning and Development Department	
<p><b>MM-CUL-2: Inadvertent Discoveries</b></p> <p>In the event that previously unrecorded prehistoric or historic resources are encountered during demolition, excavation and/or grading of the site, all activity within a 50-foot radius of the find shall be stopped, the County Project Manager or designee shall be notified, and a qualified archaeologist shall examine the find. The archaeologist shall:</p> <ol style="list-style-type: none"> <li>1) evaluate the find(s) to determine if they meet the definition of a historical or archaeological resource; and</li> <li>2) make appropriate recommendations regarding the disposition of such finds prior to issuance of building permits.</li> </ol> <p>If the finds do not meet the definition of a historical or archaeological resource, no further study or protection is necessary prior to resuming project implementation. If the find(s) does meet the definition of a historical or archaeological resource, then it should be avoided by project activities. If avoidance is not feasible, adverse effects to such resources should be mitigated in accordance with the recommendations of the archaeologist. Recommendations could include collection, recordation, and analysis of any significant cultural materials. A report of findings documenting any data recovery would be submitted to the Director of Planning. If the find(s) are human remains or grave goods, the procedures outlined in County Ordinance Code B6-18 through BC-20 shall be followed.</p> <p>Project personnel should not collect or move any cultural material. Fill soils that may be used for construction purposes should not contain archaeological materials.</p>	Verify prehistoric or historic resources have been evaluated by a qualified archaeologist and implement recommendations for dispositions of finds and verify County Ordinance Code B6-18 through BC-20 is followed for any human remains or grave goods	During demolition, excavation, and/or grading activities	Construction contractor  Qualified archaeologist evaluates the find(s) and provides recommendations	Santa Clara County Facilities and Fleet Department	
<p><b>MM-NOI-1: Minimize Construction Noise</b></p> <p>The County shall include the following measures in contractor specifications for the Project, and such measures shall be implemented during all construction phases:</p> <ul style="list-style-type: none"> <li>• In accordance with Chapter 20.100.450 of the City of San José Municipal Code, the hours of construction, including the loading and unloading of materials and truck movements, shall be limited to 7 a.m. to 7 p.m. Monday through Friday. No construction activities shall be permitted on weekends or holidays.</li> <li>• Locate staging areas and stationary noise-generating equipment, such as compressors, as far away from noise-sensitive uses as feasible, and/or provide temporary noise barriers if necessary.</li> <li>• Minimize idling times of equipment by either shutting equipment off when not in use or reducing the maximum idling time to 5 minutes.</li> </ul>	Review and approve construction specifications with inclusion of noise minimization measures	Prior to issuance of demolition and grading permits	Construction contractor	Santa Clara County Facilities and Fleet Department	

**FINAL**

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
<ul style="list-style-type: none"> <li>• Select “quiet” models of construction equipment, particularly air compressors, generators, pumps and other stationary noise sources, whenever possible; fit motorized equipment with proper mufflers in good working order.</li> <li>• Maintain and operate construction equipment in a manner to reduce or avoid high levels of noise emissions (e.g., to the extent practical, lower—rather than drop—loads into trucks or onto platforms to reduce noise-generating impacts of contacting surfaces).</li> </ul> <p>Designate a disturbance coordinator and conspicuously post this person's number around the project site and in construction notifications. The disturbance coordinator shall receive complaints about construction disturbances and, in coordination with the County, shall determine the cause of the complaint and implementation of feasible measures to alleviate the problem.</p>					
<p><b>MM TCR-1: Inadvertent Discovery of Tribal Cultural Resources</b></p> <p>In the event that potential tribal cultural resources are identified during the implementation of the requirements under Mitigation Measure MM-CUL-2, the qualified expert performing the cultural resources study, along with the County, will contact California Native American tribe(s) that have expressed interest and begin or continue consultation procedures with that tribe(s). If, as a result of the consultation, the County determines that the resource is a tribal cultural resource and the Project will have a potentially significant impact, additional mitigation measures as discussed with the tribe to avoid or reduce impacts to the resource shall be required and implemented. If the find(s) are human remains or grave goods, the procedures outlined in County Ordinance Code B6-18 through BC-20 shall be followed.</p>	<p>Verify Native American consultation has occurred and implement additional mitigation measures if necessary.</p> <p>Verify County Ordinance Code B6-18 through BC-20 is followed for any human remains or grave goods</p>	<p>During excavation and grading activities</p>	<p>Construction contractor</p> <p>Qualified archaeologist consults with Native American tribe(s) and provides additional mitigation measures</p>	<p>Santa Clara County Facilities and Fleet Department</p>	

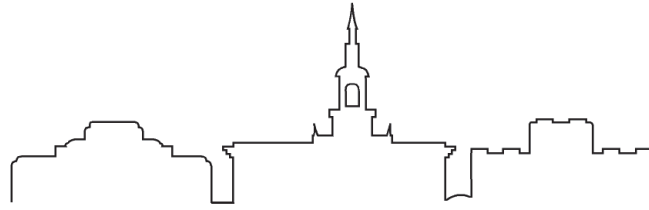
W:\C\157\004\00661095.DOCX

FINAL

## Appendix B – Public Comments

Contains:

- Comment Letter from Preservation Action Council of San Jose, dated November 9, 2020.



**PRESERVATION ACTION COUNCIL OF SAN JOSE**

*Dedicated to Preserving San Jose's Architectural Heritage*

November 9, 2020

VIA EMAIL (Emily.F.Chen@faf.sccgov.org)

County of Santa Clara Facilities and Fleet Department  
Attention: Emily Chen  
2310 North First Street, Suite 200  
San Jose, CA 95131

**RE: DRAFT EIR, FORMER SAN JOSE CITY HALL PROJECT**

Dear Ms. Chen,

After reviewing the Draft Environmental Impact Report [DEIR] for the Former San Jose City Hall Project, the Preservation Action Council of San Jose [PAC\*SJ] strongly supports the environmentally superior “No Project” alternative that avoids the unnecessary demolition of the Former City Hall, an iconic San Jose Candidate City Landmark eligible for listing in the National Register of Historic Places and the California Register of Historical Resources. We also believe the DEIR lacks sufficient evidence to support the conclusion that demolition would achieve the stated project goal of reducing ownership costs associated with the property. We therefore urge the County of Santa Clara *not* to adopt the DEIR in its present form, to instead endorse the “No Project” alternative, and to continue to pursue adaptive reuse options for the landmark structure.

CEQA Guidelines state that, in evaluating project alternatives, an EIR “shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and

PACSJ-1

PACSJ-2

comparison with the proposed project” (Guideline §15126.6(d)). As such, any meaningful comparison between demolition and preservation alternatives must include a detailed analysis of the costs associated with both demolition and preservation. We do not believe the DEIR meets this standard in its analysis of the project or its alternatives. Most notably, while general cost estimates are provided for the various preservation alternatives explored in the DEIR, it fails to compare any of these with the actual cost of the proposed project itself. In other words, the DEIR claims that demolishing the building will save the County money in long-term maintenance costs without disclosing the short-term costs necessary to accomplish this goal. Nowhere in the DEIR itself are these figures identified or discussed, but the Feasibility Study Summary Matrix included in DEIR Appendix B cites a “Rough Order of Magnitude” estimate of \$5,743,410 for demolition of the existing structure (Cumming, p.3). The DEIR includes no analysis to either confirm or question the accuracy of this figure, but if taken at face value, would seem to *far* outweigh the costs of continued maintenance, which the DEIR estimates at \$171,300 annually.

PAC SJ-2  
(Cont.d)

PAC SJ-3

Furthermore, this annual \$171,300 cost estimate for the “No Project” preservation alternative is itself questionable, given the limited data provided in the DEIR to support it. Appendix B includes a table entitled “Former City Hall Building Costs Spent to Date” (p. 29). Total costs over this 8-year period between 2012 and 2019 averaged approximately \$101,000 annually —significantly less than the projected annual cost estimates (\$171,300) of the “No Project” preservation alternative. What explains this? Furthermore, this 8-year average is significantly inflated by a single outlying year, with \$314,399 spent in 2018. In contrast, only \$20,142 was spent in 2016, and four of the eight years had total costs around \$50,000 or less. No explanation for these significant deviations are included in the DEIR analysis, calling into question the accuracy of its future projections. For example, why were maintenance/custodial costs in 2018 (\$280,104) nearly three times higher than any other year, and is it reasonable to assume that equally high costs will continue to be incurred in the future? Why or why not? In addition, it is not clear whether some of these figures include costs associated with the former City Hall Annex, which was demolished in 2018-19, or are limited strictly to the original and existing structure only. Likewise, while the “No Project” preservation alternative reasonably envisions a one-time investment of \$490,200 to “mothball” the vacant building and protect it from accelerated deterioration, the DEIR provides no discussion or analysis of how this work might (or might not) reduce

PAC SJ-4

PAC SJ-5

anticipated ownership costs into the future. Without this and other detailed analysis, the DEIR fails to adequately support the claim that demolition represents a cost-savings over the “No Project” preservation alternative.

↑  
PACSJ-5  
(Cont.d)

In its review of Project Alternatives, the DEIR also includes numerous unsupported claims that “the useful life of the rehabilitated facility would be substantially shorter than the useful life of [new construction]” (AECOM pp. 180 and 192). Such claims require explanation and evidence not provided in the DEIR or its appendices. A more accurate cost comparison between the various Project Alternatives should also include an analysis of potential Historic Tax Credits, Housing Tax Credits, and other potential redevelopment incentives, especially under redevelopment scenarios involving partnerships with a private developer. Such analysis is entirely absent from the DEIR.

PACSJ-6

PACSJ-7

In addressing the significant and unavoidable impacts of the proposed project, the DEIR rightly concludes that the demolition of the Former City Hall represents not only the loss of an individual historic resource, but also represents a significant cumulative impact to Mid-Century Modern architectural resources citywide. Given the Former City Hall’s outsized prominence in the history of San Jose and Santa Clara County, serving as the literal and figurative heart of the city’s postwar transformation into a suburban metropolis, its symbolic importance in the context of Midcentury Modernism in San Jose cannot be overstated. As such, any appropriate mitigation scope should address not only the building itself, but the larger context to which it significantly and uniquely contributes. Unfortunately, the DEIR proposes no specific mitigation measures to address this cumulative impact, proposing only a bare minimum program of documentation and commemoration of the individual resource (MM-CUL-1a-1e). Should the building’s demolition ultimately be approved, mitigation should include additional measures that directly support the preservation of other historic resources contributing to this broader architectural and historical context, including (but not limited to) support for a citywide inventory of Midcentury Modern resources (a major recommendation of the 2009 *San Jose Modernism Context Statement* by PAST Consultants, LLC).

PACSJ-8

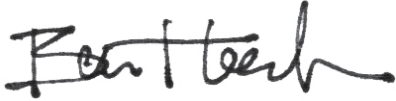
PAC\*SJ appreciates this opportunity to comment on the Draft EIR for the Former San Jose City Hall Project and looks forward to continued constructive analysis of feasible

↓  
PACSJ-9

preservation alternatives. San Jose lost its first City Hall—another irreplaceable civic icon—sixty-two years ago, when officials deemed its Victorian design to be obsolete and ugly. This decision robbed San Jose of what would surely be a beloved landmark today, yet we risk making an equally shortsighted judgment yet again with its successor.

↑  
PACSJ-9  
(Cont.d)

Sincerely,



Ben Leech  
Executive Director  
Preservation Action Council of San Jose

cc: County of Santa Clara Board of Supervisors  
County of Santa Clara Historical Heritage Commission

FINAL

## **Appendix C – Cumming Revised Cost Analysis for Scenario 1: No Project**

Contains:

- **Cumming, 2021. CoSC Former City Hall Feasibility Study, Rough Order of Magnitude Update Memo, October 21 and its attachments.**

Date: October 21<sup>st</sup> 2021  
 To: Yarden Elhanan, Senior Planner  
 From: Adam Todd, Director at Cumming Management Group  
 Re: Santa Clara County Former City Hall

Yarden,

As a follow up to our recent work updating data inputs to the **CoSC Former City Hall\_LCCA** issued March 2020, please see below for a brief explanation of the LCCA and its inputs. A modified Scenario 1 supplemental update dated 10.21.2021 is attached to this memo.

**Date Inputs**

Utilities included in the Uniform Value section of Scenario 1 table are a function of *Water, Electric, and Miscellaneous Service* cost data.

Uniform Value						
N	Construction	Utilities	O&M	Lease/Rental Revenue	Total	
0	\$ (490,203)	\$ -	\$ -	\$ -	\$ (490,203)	
1		\$ (34,411)	\$ (99,346)	\$ -	\$ (133,757)	
2		\$ (35,444)	\$ (102,326)	\$ -	\$ (137,770)	
3		\$ (36,507)	\$ (105,396)	\$ -	\$ (141,903)	
4		\$ (37,602)	\$ (108,558)	\$ -	\$ (146,160)	
5		\$ (38,730)	\$ (111,815)	\$ -	\$ (150,545)	

Water cost data was provided to the LCCA team for the historical period of 2016-2021. The model uses a simple average function across the 5-year period in order to standardize baseline assumptions into the future. The resulting baseline annual water consumption in the model is \$18,278. Electric data was not as transparent, with a single payment for consumption cost data spanning multiple years of use available at the time of performing the LCCA calculations. The team working on the LCCA update considered options to modify this data for baseline analysis, but ultimately used the data in its existing form for future projections. The baseline years assumption for electric costs are \$13,175. The Miscellaneous data is made up of rubbish and sanitary service costs over the 2016-2021 period. Data for these inputs were not received on an annual basis and as such, averages of the data collected offered the best metric. Baseline year costs are \$1,955.

The model also includes Operations and Maintenance (O&M) costs in the baseline calculation for total cost of ownership calculations.

Uniform Value						
N	Construction	Utilities	O&M	Lease/Rental Revenue	Total	
0	\$ (490,203)	\$ -	\$ -	\$ -	\$ (490,203)	
1		\$ (34,411)	\$ (99,346)	\$ -	\$ (133,757)	
2		\$ (35,444)	\$ (102,326)	\$ -	\$ (137,770)	
3		\$ (36,507)	\$ (105,396)	\$ -	\$ (141,903)	
4		\$ (37,602)	\$ (108,558)	\$ -	\$ (146,160)	
5		\$ (38,730)	\$ (111,815)	\$ -	\$ (150,545)	

O&M costs were provided to the LCCA team for the period of 2011- 2021 and encompassed a wide range of cost inputs. These include but are not limited to Architectural Contract Services, Environmental Restoration Services, Administrative Cost Allocations, Mechanical Contract Services, among others. The LCCA team used a simple average of this data across the reporting period to provide a baseline rate for future cost projections. The baseline year assumption for O&M costs are \$96,452.

### Cost Impacts

Total cost of ownership assumptions are dependent on two equalizing data points: *Compounding Escalation Rate and Discount Rate*.

Compounding Escalation Rate	3%
Discount Rate	4%

In order to account for things like general inflation, anomalous cost increases, and cost modification to Utility and O&M costs in the future, a Compounding Escalation Rate is used as a modifier. In an effort to forecast future increases in cost, and provide a conservative total cost of ownership value, the LCCA team used a 3% annual compounding rate across all cost inputs through the 30-year study period.

Discounted to Present Value						
Construction	Utilities	O&M	Lease/Rental Revenue		Total	
\$ (490,203)	\$ -	\$ -	\$ -		\$ (490,203)	
	\$ (33,088)	\$ (95,525)	\$ -		\$ (128,613)	
	\$ (32,770)	\$ (94,606)	\$ -	} <b>3% Increase</b>	\$ (127,376)	
	\$ (32,455)	\$ (93,697)	\$ -		\$ (126,151)	
	\$ (32,143)	\$ (92,796)	\$ -		\$ (124,938)	
	\$ (31,834)	\$ (91,903)	\$ -		\$ (123,737)	

Conversely, future dollars are not of equal value to today's dollars, especially 20 and 30-years in the future. In an effort to bring the value of \$100 in costs 30-years in the future into today's value, our team applied a Discount Rate to all costs over the 30-year study period. The discount rate used for the full term is 4%.

Discounted to Present Value						
Construction	Utilities	O&M	Lease/Rental Revenue		Total	
(490,203)	\$ -	\$ -	\$ -		\$ (490,203)	
	\$ (33,088)	\$ (95,525)	\$ -		\$ (128,613)	
	\$ (32,770)	\$ (94,606)	\$ -	} <b>4% Discount</b>	\$ (127,376)	
	\$ (32,455)	\$ (93,697)	\$ -		\$ (126,151)	
	\$ (32,143)	\$ (92,796)	\$ -		\$ (124,938)	
	\$ (31,834)	\$ (91,903)	\$ -		\$ (123,737)	

**Supporting Data**

Attached to this memo is the backup file with data provided to the LCCA team for analysis. Data was last provided to the LCCA team August 2021. Additionally, an updated supplemental Scenario 1 analysis is attached to this memo.

1. *Old City Hall Utility and Maintenance Cost as of 9-21-2021.xls*
2. *CoSC Former City Hall\_LCCA – Update – City Hall Only M+O Update 10212021*

Old City Hall Utility and Maintenance Cost as of 9-21-2021

Year	Utilities						Maintenance/Custodial
	Garbage	Electricity*	Natural Gas	Water	Sewer	Municipal	
2021				\$15,180.29	\$1,065.09		\$121,202.45
2020				\$17,795.41	\$1,065.09		\$86,690.75
2019		\$79,053.30		\$30,783.09	\$1,065.09		\$25,791.43
2018	\$371.75			\$24,065.39	\$3,139.19		\$280,104.84
2017				\$13,116.10			\$57,897.84
2016				\$8,729.03			\$7,026.38
Baseline Cost/Year	\$371.75	\$13,175.55		\$18,278.22	\$1,583.62		\$96,452.28
Subtotal Costs	\$371.75	\$79,053.30	\$0.00	\$109,669.31	\$6,334.46	\$0.00	\$578,713.69
Total Costs			\$195,428.82				\$578,713.69

\* The \$79,053 charge in 2019 reflects a bill from the City of San Jose that aggregated charges for several years. This is because the electric service for the Former City Hall facility was not segregated from the San Jose Police Department and the City had to calculate charges for Former City Hall. Brad Vance, Utility Program Analysis with the County's Facilities and Fleet Department, reviewed these costs and determined that the \$13,175 figure was a reasonable estimate of the annual electricity costs for the Former City Hall facility.

<b>Scenario</b>	<b>1</b>	<b>No Project</b>
<b>Cost Option</b>	<b>Low Cost</b>	

Square Footage	113,430	
<b>Cost</b>		
<b>Low Cost</b>	O&M (5 Years before Retrofitting or Mothballing)	\$ 96,452.28
Former City Hall \$ 490,203	O&M (After Retrofit - Office)	2.15 per square foot
New Development -	O&M (After Retrofit - Housing)	0.78 per square foot
Sitework -		\$ -
<b>Total Low Cost \$ 490,203</b>	Compounding Escalation Rate	3%
	Discount Rate	4%
<b>High Cost</b>		
\$ -		
	<b>Housing Revenue</b>	
	Lease/Rental Revenues per Unit per Year	
	No. du	
<b>Total High Cost \$ 490,203</b>	<b>Annual Revenues \$</b>	<b>-</b>

**Additional Notes**

† O&M: National Council of School Facilities "State of our Schools, 2016"

† Assumed uniform long-term escalation rate

† Assumed standard Federal Discount rate to account for time value of money

**30-YEAR TOTAL COST OF OWNERSHIP  
(PRESENT VALUE) \$ (3,855,932)**

**Aggregate Life-Cycle Cost Analysis and Total Cost of Ownership**

N	Uniform Value					Discounted to Present Value				
	Construction	Utilities	O&M	Lease/Rental Revenue	Total	Construction	Utilities	O&M	Lease/Rental Revenue	Total
0	\$ (490,203)	\$ -	\$ -	\$ -	\$ (490,203)	\$ (490,203)	\$ -	\$ -	\$ -	\$ (490,203)
1	\$ (34,411)	\$ (99,346)	\$ (133,757)	\$ -	\$ (267,514)	\$ (33,088)	\$ (95,525)	\$ (128,613)	\$ -	\$ (257,226)
2	\$ (35,444)	\$ (102,326)	\$ (137,770)	\$ -	\$ (275,540)	\$ (32,770)	\$ (94,606)	\$ (127,376)	\$ -	\$ (254,752)
3	\$ (36,507)	\$ (105,396)	\$ (141,903)	\$ -	\$ (283,806)	\$ (32,455)	\$ (93,697)	\$ (126,151)	\$ -	\$ (252,303)
4	\$ (37,602)	\$ (108,558)	\$ (146,160)	\$ -	\$ (292,320)	\$ (32,143)	\$ (92,796)	\$ (124,938)	\$ -	\$ (250,077)
5	\$ (38,730)	\$ (111,815)	\$ (150,545)	\$ -	\$ (300,990)	\$ (31,834)	\$ (91,903)	\$ (123,737)	\$ -	\$ (248,074)
6	\$ (39,892)	\$ (115,169)	\$ (155,061)	\$ -	\$ (309,922)	\$ (31,527)	\$ (91,020)	\$ (122,547)	\$ -	\$ (246,194)
7	\$ (41,089)	\$ (118,624)	\$ (159,713)	\$ -	\$ (319,426)	\$ (31,224)	\$ (90,145)	\$ (121,369)	\$ -	\$ (244,438)
8	\$ (42,322)	\$ (122,183)	\$ (164,505)	\$ -	\$ (329,009)	\$ (30,924)	\$ (89,278)	\$ (120,202)	\$ -	\$ (242,804)
9	\$ (43,591)	\$ (125,848)	\$ (169,440)	\$ -	\$ (338,779)	\$ (30,627)	\$ (88,419)	\$ (119,046)	\$ -	\$ (241,286)
10	\$ (44,899)	\$ (129,624)	\$ (174,523)	\$ -	\$ (348,746)	\$ (30,332)	\$ (87,569)	\$ (117,901)	\$ -	\$ (239,886)
11	\$ (46,246)	\$ (133,513)	\$ (179,759)	\$ -	\$ (358,918)	\$ (30,041)	\$ (86,727)	\$ (116,768)	\$ -	\$ (238,596)
12	\$ (47,633)	\$ (137,518)	\$ (185,151)	\$ -	\$ (369,302)	\$ (29,752)	\$ (85,893)	\$ (115,645)	\$ -	\$ (237,414)
13	\$ (49,062)	\$ (141,643)	\$ (190,706)	\$ -	\$ (380,411)	\$ (29,466)	\$ (85,067)	\$ (114,533)	\$ -	\$ (236,334)
14	\$ (50,534)	\$ (145,893)	\$ (196,427)	\$ -	\$ (392,255)	\$ (29,182)	\$ (84,249)	\$ (113,432)	\$ -	\$ (235,359)
15	\$ (52,050)	\$ (150,270)	\$ (202,320)	\$ -	\$ (404,340)	\$ (28,902)	\$ (83,439)	\$ (112,341)	\$ -	\$ (234,486)
16	\$ (53,612)	\$ (154,778)	\$ (208,389)	\$ -	\$ (416,679)	\$ (28,624)	\$ (82,637)	\$ (111,261)	\$ -	\$ (233,714)
17	\$ (55,220)	\$ (159,421)	\$ (214,641)	\$ -	\$ (429,281)	\$ (28,349)	\$ (81,842)	\$ (110,191)	\$ -	\$ (233,042)
18	\$ (56,877)	\$ (164,204)	\$ (221,080)	\$ -	\$ (442,141)	\$ (28,076)	\$ (81,055)	\$ (109,131)	\$ -	\$ (232,470)
19	\$ (58,583)	\$ (169,130)	\$ (227,713)	\$ -	\$ (455,266)	\$ (27,806)	\$ (80,276)	\$ (108,082)	\$ -	\$ (231,998)
20	\$ (60,341)	\$ (174,204)	\$ (234,544)	\$ -	\$ (468,665)	\$ (27,539)	\$ (79,504)	\$ (107,043)	\$ -	\$ (231,626)
21	\$ (62,151)	\$ (179,430)	\$ (241,580)	\$ -	\$ (482,341)	\$ (27,274)	\$ (78,740)	\$ (106,014)	\$ -	\$ (231,254)
22	\$ (64,015)	\$ (184,813)	\$ (248,828)	\$ -	\$ (496,283)	\$ (27,012)	\$ (77,983)	\$ (104,994)	\$ -	\$ (230,882)
23	\$ (65,936)	\$ (190,357)	\$ (256,293)	\$ -	\$ (510,489)	\$ (26,752)	\$ (77,233)	\$ (103,985)	\$ -	\$ (230,510)
24	\$ (67,914)	\$ (196,068)	\$ (263,982)	\$ -	\$ (524,966)	\$ (26,495)	\$ (76,490)	\$ (102,985)	\$ -	\$ (230,138)
25	\$ (69,951)	\$ (201,950)	\$ (271,901)	\$ -	\$ (539,703)	\$ (26,240)	\$ (75,755)	\$ (101,995)	\$ -	\$ (229,766)
26	\$ (72,050)	\$ (208,008)	\$ (280,058)	\$ -	\$ (554,716)	\$ (25,988)	\$ (75,026)	\$ (101,014)	\$ -	\$ (229,394)
27	\$ (74,211)	\$ (214,248)	\$ (288,460)	\$ -	\$ (570,003)	\$ (25,738)	\$ (74,305)	\$ (100,043)	\$ -	\$ (229,022)
28	\$ (76,438)	\$ (220,676)	\$ (297,114)	\$ -	\$ (585,566)	\$ (25,490)	\$ (73,590)	\$ (99,081)	\$ -	\$ (228,650)
29	\$ (78,731)	\$ (227,296)	\$ (306,027)	\$ -	\$ (601,403)	\$ (25,245)	\$ (72,883)	\$ (98,128)	\$ -	\$ (228,278)
30	\$ (81,093)	\$ (234,115)	\$ (315,208)	\$ -	\$ (617,516)	\$ (25,002)	\$ (72,182)	\$ (97,184)	\$ -	\$ (227,906)
V[	\$ (490,203)	\$ (1,637,135)	\$ (4,726,424)	\$ -	\$ (6,853,761)	\$ (490,203)	\$ (865,897)	\$ (2,499,834)	\$ -	\$ (3,855,933)