





Planning & Development Division
Planning & Economic Development Department

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ACTION OF THE CITY OF DULUTH PLANNING COMMISSION

DATE: May 14, 2024

ACTION: Adoption of the Final Alternative Urban Areawide Review (AUAR)

PROJECT: Central High School Redevelopment Project

RESPONSIBLE GOVERNMENTAL UNIT

City of Duluth
Planning Commission
Contact: Kyle Deming, Senior Planner
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PROJECT PROPOSER

City of Duluth
Department of Planning & Economic Development
Ryan Pervenanze, Manager of Planning and
Development Division
411 W. First St., Rm. 160
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PLANNING COMMISSION FILE NUMBER: PL 23-127

PROJECT LOCATION: An approximately 80-acre area on the site of the former Central High School near Central Entrance and H. Courtney Drive in the City of Duluth, St. Louis County, Minnesota.

REASON FOR AUAR PREPARATION

Minnesota Rules 4410.3610, Subpart 1 allows for eligible projects to be reviewed through the AUAR procedures instead of the EAW and EIS procedures. The City undertook an environmental review process to determine if future redevelopment of the former Central High School site has the potential for significant environmental effects and prepared and Draft AUAR pursuant to State requirements. Minnesota Rules Chapter 4410.4300, Subpart 14 and Minnesota Rules 4410.4400, Subpart 11 pertain to Scenario A (Business Park). Minnesota Rules Chapter 4410.4300 Subpart 32 and 4410.4400 Subpart 21 pertain to the Scenario B (Mixed Use Scenario).

AUAR DOCUMENT PREPARATION AND PUBLIC REVIEW

Pursuant to Minnesota Rules Chapter 4410.3610, Subpart 5a, additional procedures are required when certain large specific projects are reviewed. A Scoping EAW was prepared and noticed on December 5, 2023, in accordance with these procedures to guide the drafting of the AUAR. A public hearing was held by the Planning Commission on December 12, 2023. All comments were considered (including written comments received during the 30-day period) by the Planning Commission when they approved the Scoping EAW and ordered the drafting of an AUAR at their regular meeting on January 9, 2024.

The Draft AUAR was officially noticed in the February 20, 2024, EQB Monitor and was provided to the distribution list starting the 30-day comment period. The Draft AUAR was posted for public viewing on the City's Environmental Reviews web page and was made available at the Duluth Public Library. The City issued a news release and legal notice

was published in the Duluth News Tribune announcing the availability of the document, the 30-day comment period, and the public hearing.

The Planning Commission held a public hearing at its regularly scheduled meeting on March 12, 2024. At the close of the 30-day comment period on March 21, 2024, responses to all comments were prepared and necessary changes to the Draft AUAR were made, such comment responses and Draft AUAR changes having been subsequently approved by the Planning Commission at their April 9, 2024, regular meeting.

The Final AUAR document (incorporating all changes) was officially noticed in the April 23, 2024, EQB Monitor and responses to commenters provided on that day. The 10-day objection period concluded on May 7, 2024, and no objections to adoption of the Final UAR were received from State agencies. However, during the objection period, the Minnesota Department of Natural Resources submitted a letter encouraging bird-friendly project design.

DECISION TO ADOPT AUAR AND MITIGATION PLAN

Resolved that, Pursuant to Minnesota Rules 4410.3610, Subpart 5.E, the City of Duluth Planning Commission adopts the Central High School Redevelopment Project Final Alternative Urban Areawide Review (AUAR) dated April, 2024, with all Appendices, and including Mitigation Strategies found within the Final AUAR document.

Decided at Duluth, Minnesota, on Tuesday, May 14, 2024.

BY ORDER OF THE CITY PLANNING COMMISSION



Gary Eckenberg, President, City of Duluth Planning Commission

**CITY OF DULUTH, MINNESOTA
PLANNING COMMISSION**

**ADOPTION OF FINAL ALTERNATIVE URBAN AREAWIDE REVIEW (AUAR)
AND
MITIGATION PLAN**

DATE: **May 14, 2024**

PROJECT: **Central High School Redevelopment Project (PL 23-127)**

RESPONSIBLE GOVERNMENTAL UNIT

City of Duluth
Planning Commission
Contact: Kyle Deming, Senior Planner
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PROJECT PROPOSER

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REASON FOR AUAR PREPARATION

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PROJECT LOCATION

An approximately 80-acre area on the site of the former Central High School near Central Entrance and H. Courtney Drive in the City of Duluth, St. Louis County, Minnesota.

AUAR DEVELOPMENT SCENARIOS

Two development scenarios were considered as part of the AUAR which include one scenario that is consistent with the City’s adopted Comprehensive Plan (Imagine Duluth 2035 – Forward Together¹), and another scenario consisting of a mixed commercial and residential development pattern. The mixed use scenario is based on a potential development proposed by a private developer and incorporates elements that the City intends to pursue as part of the overall development of the AUAR area. The two development scenarios are further described below:

¹ City of Duluth. Imagine Duluth 2035 – Forward Together. Adopted June 25, 2018. https://duluthmn.gov/media/rtgk5tin/imagine-duluth-2035-combined_website_temp.pdf

- Scenario A: Business Park Scenario

The business park scenario would consist of approximately 360,000 square feet of light industrial/warehouse distribution uses at full buildout, consistent with the City's future land use map in its adopted Comprehensive Plan. Surface parking would be included in this scenario, and the site would be accessed via the existing entrance at Central Entrance/Trunk Highway (TH) 194 and H. Courtney Drive. Future potential connections are shown including the extension of Portia Johnson Drive to a new entrance on Blackman Avenue to the west and a potential connection to Lake Avenue and the residential neighborhood to the southeast of the AUAR area.

Both the Duluth Traverse and Central Entrance trails would remain within the AUAR area, although slight adjustments to alignment may be necessary depending on the future site layout. The scenario proposes that the existing broadcast towers would remain, as well as the approximately 27 acres of wooded area. Exhibit 1 depicts Development Scenario A.

- Scenario B: Mixed Use Scenario (Maximum Development)

The mixed commercial and residential scenario (mixed use) were studied in this AUAR as the maximum development scenario. This scenario is intended to maximize development of the AUAR area and represents the "worst case scenario" for environmental impacts studied in the AUAR. The actual development, encompassing plans proposed by a private developer, may represent a modified version of this development scenario, which may include fewer residential units and less commercial development depending on market forces. The City of Duluth has also proposed elements within this scenario that were explored as part of the full buildout of the AUAR area, including additional connections to adjacent neighborhoods, open space and development of property owned by the school district within the AUAR area.

At full buildout, the mixed use scenario would consist of 1,590 units of residential and 124,000 square feet of commercial development. Potential commercial uses considered in this AUAR include hotel, restaurant, pre-school, alternative school, and other neighborhood-serving commercial uses. Residential development is proposed to consist of a mix of densities including apartments and townhomes. The scenario would include a mix of surface and structured parking.

The AUAR area would be accessed via the existing entrance at Central Entrance (TH 194)/H. Courtney Drive. Future potential connections are shown including the extension of Portia Johnson Drive to Blackman Avenue to the west and a potential connection to Lake Avenue and the residential neighborhood to the southeast of the AUAR area.

Both the Duluth Traverse and Central Entrance trails would remain within the AUAR area, although slight adjustments to alignment may be necessary depending on the future site layout. This scenario proposes the addition of trailhead and a small park facility with restrooms. The scenario proposes that the existing broadcast towers would remain, as well as most of the approximately 27 acres of wooded area. Exhibit 2 depicts Development Scenario B.

Exhibit 1 Development Scenario A - Business Park

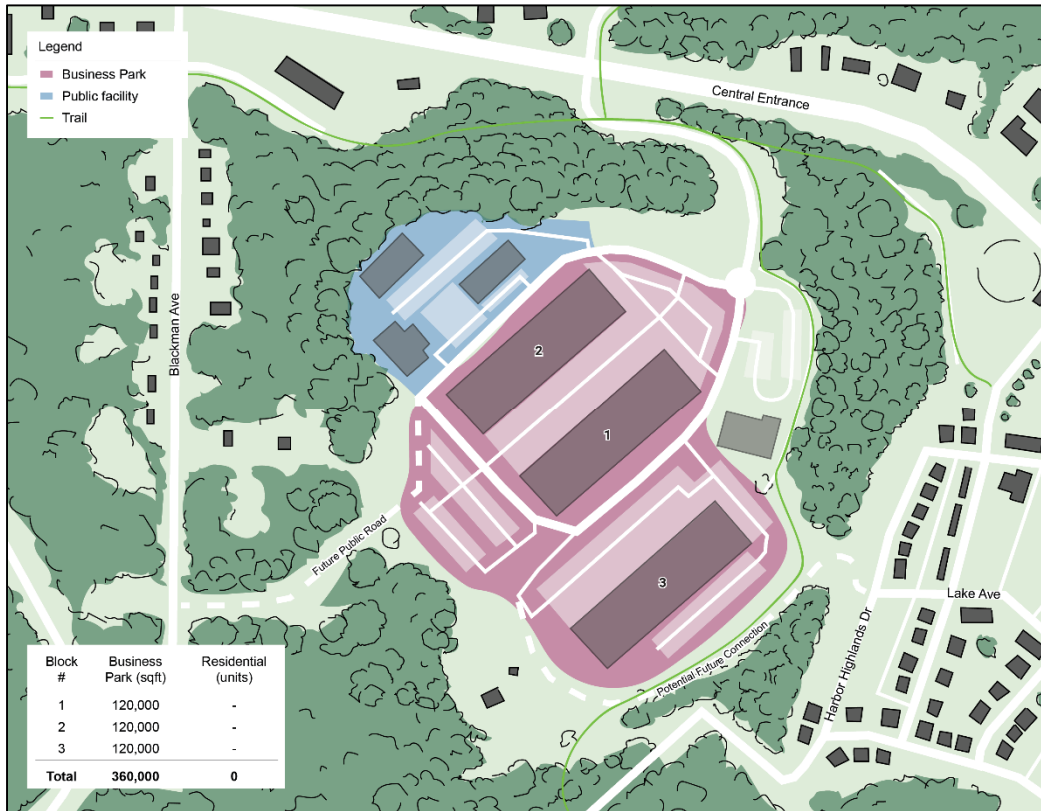
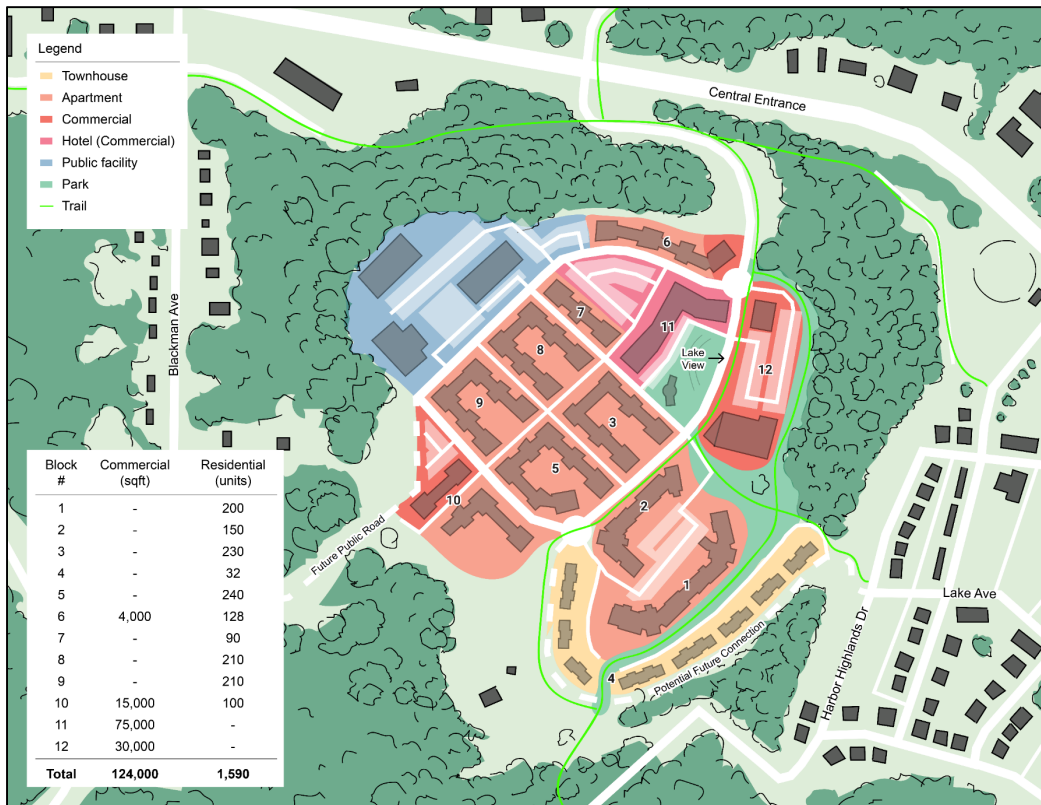


Exhibit 2: Development Scenario B – Mixed Use (Maximum Development)



AUAR DOCUMENT PREPARATION AND PUBLIC REVIEW

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DECISION TO ADOPT AUAR AND MITIGATION PLAN

Pursuant to Minnesota Rules 4410.3610, Subpart 5.E, the City of Duluth Planning Commission adopts the Central High School Redevelopment Project Final Alternative Urban Areawide Review (AUAR) dated April, 2024, with all Appendices, and including Mitigation Strategies found within the Final AUAR document which are summarized below.

MITIGATION PLAN

AUAR Item 10. Land Use Mitigation Strategies:

- a. Provide adequate screening to existing properties, especially residential uses to the east and west. Screening could include preservation of existing wooded areas.
- b. Retain Central Entrance and Duluth Traverse trails within the AUAR area. Minor rerouting may be necessary to accomplish this depending on specific development plans.

- c. The City will work with developers to site a Type 1 Trailhead as recommended in the City's Duluth Traverse Mini Master Plan.
- d. Ensure that lighting, building form and façade, landscaping and tree preservation meet specifications in Article 4 of the City Code.

AUAR Item 11. Geology, Soils and Topography/Land Forms Mitigation Strategies:

- a. If groundwater dewatering is required during construction and expected to exceed 10,000 gallons per day or 1 million gallons per year, a temporary dewatering permit could be required by the DNR. Additionally, groundwater should be tested for contamination before dewatering activities begin. If the groundwater is found to be contaminated, state and local agency input would be required to select an appropriate discharge location and/or on-site treatment of contaminated water.
- b. If blasting is required to complete construction within the bedrock, a geotechnical review should be completed beforehand.
- c. Land alteration and site restoration activities would be regulated by federal, state, and/or local rules. Based on soil survey data and overall site conditions, there are special concerns regarding erosion potential, steep slopes, soil stability, or highly permeable soils. Existing regulatory requirements, described below, will be sufficient to prevent groundwater contamination, excessive erosion, and excessive sediment migration.
- d. Site preparation and the subsequent development of individual sites would require a National Pollution Discharge Elimination System (NPDES) MS4 Stormwater Discharge Permit and Construction Stormwater permit for stormwater management associated with site grading and preparation. The permit is issued by the MPCA following U.S. Environmental Protection Agency (EPA) rules. The permit application includes a Stormwater Pollution Prevention Plan (SWPPP) with detailed erosion and sediment control plans for all aspects of the Project, including postconstruction permanent stormwater management. Individual end users may also be required to obtain their own stormwater permits depending on the degree of land disturbance. The type of individual site development permit needed would depend on type of use. Certain industrial facilities require an Industrial Stormwater permit from MPCA, which could include ongoing monitoring and sampling to ensure pollutants (including sediment) do not exceed pre-determined thresholds.
- e. Site preparation and the subsequent development of individual sites would also require compliance with the following provisions set forth in the City of Duluth Legislative Code 9 Unified Development Chapter (City Code): Prior to site disturbance, the developer must obtain City permits appropriate for their proposed development. The City will require a detailed Geotechnical investigation to determine strength, stability, and bearing capacity of the site's soils to ensure that stability risks are accounted for in the civil design. The City will require a

comprehensive Erosion & Sediment Control (ESC) plan and stormwater management plan. The City will apply post-construction stormwater performance standards meant to limit the quality, rate, and volume of runoff leaving the site. The City may impose stricter controls than the MPCA permit conditions or City Code standards if deemed necessary by the City Engineer. The Code requires ongoing monitoring of ESC and stormwater management during and after construction. Responsibility for permanent maintenance and operations of the stormwater system will be determined during the permitting process.

The permit may require ongoing monitoring and reporting during construction. Postconstruction monitoring may also be required. Erosion and sediment control practices must be maintained throughout construction and must be subject to both routine and storm-event inspections by the applicant. Regulatory representatives must be allowed on site to conduct their own inspections as deemed necessary by the regulatory authority.

AUAR Item 12. Water Resources Mitigation Strategies:

- a. Any wells encountered during construction of the AUAR area that are no longer in use (or are not planned to be used following completion of construction) are required to be sealed by a licensed well contractor according to Minnesota Well Code. Wells may be allowed to remain open if an annual Unused Well Permit is obtained and conditions of the permit are followed.
- b. Groundwater dewatering is cited in Item 11 as a mitigation strategy.
- c. Based on a preliminary assessment, it is anticipated that two potential connections points to the City's sewer collection infrastructure system may be necessary to accommodate wastewater generated by the development scenarios. Additionally, improvements to the sewer collection system may be required as development approaches full buildout and other surrounding development occurs which could constrain capacity of the system. Further analysis and/or downstream modeling should be performed at the time that capacity constraints are anticipated. Proposed developers should coordinate with the City of Duluth Public Works and Utilities Department and WLSSD as development is proposed to confirm the need for improvements to the City's sewer and WLSSD's collection infrastructure system.
- d. The DNR is the state permitting agency for water appropriations. Temporary dewatering that exceeds 10,000 gallons per day or 1,000,000 gallons per year would require a permit from the Minnesota DNR.
- e. If water utilized for dust control is taken from a river or stream, a DNR water appropriation permit would be required. Products containing chloride for dust suppression in areas draining to DNR Public Waters should be avoided.
- f. Water pressure boosting systems may be needed for buildings and should be confirmed as development is proposed.
- g. BMPs (e.g., silt fence, sediment control logs, etc.) will be utilized during construction to avoid and minimize turbidity, sedimentation, stormwater runoff, and other potential effects to surface waters in the vicinity of the AUAR area.

- h. Future development will be required to implement stormwater BMPs in compliance with the City of Duluth and MPCA regulations in place at the time that the project is proposed. Development within the AUAR area would be required to comply with the Above the Bluff Line requirements. Future developments will require a City-approved stormwater management plan for each phase that, among other requirements, must show how projected water flows won't exceed the capacity of the downstream system.
- i. The City strongly recommends that project developers consider current and future climate trends in the design of future projects. Proposed stormwater infrastructure and BMPs should be designed to accommodate an increase in stormwater discharge and emergency overflows associated with an increased frequency of large rainfall events.
- j. Developers should consider incorporating green infrastructure measures in the project design when feasible.
- k. Additional BMPs may be required as part of the Construction Stormwater Permit given the AUAR area ultimately drains to Lake Superior. Specific BMPs requirements would be identified based on the specific conditions of future development and the regulations and requirements in place at the time that development is proposed.
- l. BMPs and wildlife-friendly erosion and sediment control devices shall be used during construction activities as required by the NPDES Permit, SWPPP, and Construction Site Stormwater Permit to prevent sediment-laden stormwater runoff from the AUAR area into receiving wetlands and waterbodies, which could adversely impact habitats of aquatic species.
- m. Future proposers should apply MPCA and the local agency guidance, such as smart salting, to manage the increase in chloride.
- n. Wetland impacts are not anticipated under the proposed development scenarios. Measures to avoid and minimize impacts to wetlands would be required to be evaluated if wetlands were to be impacted.
- o. If future proposed development would result in wetland impacts, a wetland replacement and mitigation plan would be required in accordance with all regulations and requirements in place at the time of final design and permitting.

AUAR Item 13. Contamination/Hazardous Materials/Wastes Mitigation Strategies:

- a. At the time of development, a CCP or a waste management plan shall be prepared to address proper handling, treatment, storage, and disposal of solid wastes; hazardous materials; petroleum products; and other regulated materials/wastes that are used or generated during construction. The CCP or waste management plan would also establish protocols to minimize impacts to soil and groundwater in the event a release of hazardous substances or petroleum occurs during construction.
- b. If soil contamination is discovered through due diligence testing or during development, the developer or other responsible party will be required to report the release to the MN Duty Officer and appropriately mitigate the contaminants according to the type of development planned and in compliance with state and federal requirements. Completion of a RAP/CCP that details appropriate methods to handle and dispose of any such materials that are encountered

may be necessary. The RAP would be submitted to the MPCA for review and approval.

- c. Demolition and construction wastes shall either be recycled or disposed in the proper facilities. Solid wastes shall be managed according to MPCA and other regulatory requirements.
- d. In the event demolition is required, complete a pre-demolition Hazardous Building Materials Survey of the existing buildings in accordance with MDH and MPCA requirements prior to the start of demolition activities to determine if any regulated materials are present. Mitigate any identified regulated material prior to demolition for proper disposal according to local, State and federal requirements. Demolition wastes will either be recycled or disposed in the proper state-licensed facilities.
- e. Aboveground or underground storage tanks identified within the AUAR area prior to or during construction should be removed in accordance with local, state, and federal requirements.
- f. Fueling activities during construction will comply with MPCA operating and containment requirements. Prior to construction activities, a spill prevention control and countermeasure (SPCC) plan will be prepared to provide best management plans to minimize and mitigate petroleum and hazardous materials spills.
- g. Depending on the type of final development, a spill prevention plan will be prepared to provide best management plans to minimize and mitigate petroleum and hazardous material spills following construction activities.

**AUAR Item 14. Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)
Mitigation Strategies:**

- a. Per the DNR MCE response letter, tree clearing should be avoided from June 1 through August 15 to avoid the destruction of bat maternity roosting colonies during the pup rearing season.
- b. Tree removal, if necessary, is recommended to occur during the bat inactive season of November 15 to March 31, inclusive.
- c. When possible, removal of vegetation should occur outside of the bird nesting window to minimize potential impacts to migratory birds, if present. If vegetation clearing cannot be avoided during the peak breeding season for migratory birds (approximately May 15 to August 1), a qualified biologist should conduct a pre-construction breeding bird survey within the AUAR area to determine the absence or presence of breeding birds and their nests.
- d. The Minnesota B3 Guidelines identify strategies for developing bird-safe buildings, including the option of fritted glass. The City will strongly encourage future developers to consider incorporating bird-safe building design measures when feasible.
- e. BMPs and wildlife-friendly erosion and sediment control devices should be used during construction activities as required by the NPDES Permit, SWPPP, and Construction Site Stormwater Permit to prevent sediment-laden stormwater runoff from the AUAR area into receiving wetlands and waterbodies, which could adversely impact habitats of aquatic semi-aquatic species, such as the Blanding's turtle and shorebirds.

- f. Erosion control blankets and mulch products will be limited to those that do not contain plastic mesh netting or synthetic (plastic) fiber additives, respectively, in areas that drain to Public Waters.
- g. Native plants should be incorporated into vegetation plans for landscaping open spaces within the AUAR area, including stormwater basins, and to enhance wildlife habitat and to help prevent the establishment of invasive plants and noxious weeds. Where feasible, Board of Water and Soil Resources (BWSR) or MnDOT seed mixes with native species should be used for stormwater features, parkland, and landscaping in order to provide habitat for the federal candidate monarch butterfly and other pollinators.
- h. Herbicide, fungicide, and insecticide use within the AUAR area will be minimized to the extent practicable. If the application of these products is necessary during construction or operation within the AUAR area, application should be limited to targeted outbreaks and will be targeted toward the nuisance species.
- i. Invasive species prevention measures should be implemented during construction to prevent the movement of invasive species on trucks, heavy equipment, off-highway vehicles, and equipment and tools to reduce the likelihood of introducing invasive species from off site. Measures may include requiring contractors and others working on site to arrive and leave with clean equipment free from visible plants, seeds, mud, and dirt clods. Other measures may include using weed-free seed and mulch products and avoiding the re-use of the top six inches of stockpiled materials (mulch, soil, gravel) that may contain more weed seeds.
- j. The results of the DNR NHIS review are typically valid for one year. The NHIS database must be consulted prior to the commencement of construction activities within the AUAR area to identify any new records of rare or otherwise significant species, native plant communities, and other natural features within the AUAR area vicinity.

AUAR Item 15. Historic Properties Mitigation Strategies:

- a. If a future project takes advantage of federal funding, or requires a federal permit or license, a Section 106 review will be required along with consultation with the SHPO.
- b. No previously inventoried architectural resources within a half mile of the AUAR area are listed on or eligible for the NRHP, based on the desktop review.
- c. Based on the preliminary desktop review, a historic architectural property survey is not recommended at this time. If a future project takes advantage of federal financial assistance, or requires a federal permit or license, a Section 106 review would be required along with consultation with the SHPO.

AUAR Item 16. Visual Mitigation Strategies:

- a. Exterior lighting would meet or exceed requirements in the City's zoning code Article 4, Section 50-31.
- b. Building form and façade would meet or exceed requirements in the City's zoning code Article 4, Section 50-30.

- c. Screening would meet or exceed requirements in the City's zoning code Article 4, Section 50-26.
- d. Landscaping and tree preservation would meet or exceed requirements in the City's zoning code Article 4, Section 50-25.
- e. Wooded areas and vegetative buffers will be retained to provide additional screening to adjacent properties as much as feasible.
- f. Developer will comply with any additional visual impact assessments or mitigation measures proposed by the City during the development review process for individual projects within the AUAR area.

AUAR Item 17. Air Mitigation Strategies:

- a. BMPs shall be implemented during construction to control dust, which may include the following minimization and mitigation measures:
 - i. Minimization of land disturbance during site preparation
 - ii. Use of watering trucks to minimize dust
 - iii. Covering of trucks while hauling soil/debris off-site, or transferring materials
 - iv. Stabilization of dirt piles if they are not removed immediately
 - v. Use of dust suppressants on unpaved areas
 - vi. Minimization of unnecessary vehicle and machinery idling
 - vii. Products containing chloride would be avoided as a dust suppressant in areas that drain to wetlands or public waters
- b. Any proposed development that meets mandatory EAW or EIS thresholds shall analyze stationary source air emissions consistent with their specific project components.

AUAR Item 18. Greenhouse Gas (GHG) Emissions/Carbon Footprint Mitigation Strategies:

- a. Proposed development within the AUAR area would preserve as many of the existing trees as possible. Current development scenarios propose to preserve all 27 acres of existing wooded area.
- b. Proposed development within the AUAR area would use energy-efficient lighting in buildings and parking lots where feasible.
- c. Proposed development within the AUAR area would use energy-efficient building materials where feasible.
- d. Proposed development within the AUAR area would include the installation of energy-efficient appliances, windows and heating, ventilation, and air conditioning (HVAC) units, where feasible.
- e. Proposed development within the AUAR area would include installation of programmable thermostats where feasible.

- f. Proposed development within the AUAR area would use renewable energy sources and install plug-ins for electric/hybrid vehicles where feasible.
- g. Proposed development within the AUAR area would prioritize non-motorized connections and use of transit where feasible to reduce single-occupancy trips.
- h. Per the City's sustainable development standards (City Code 50-29), all new developments containing three or more units and all non-residential development with a gross floor area of 100,000 square feet or more are required to achieve minimum points to adhere to the City's sustainable design requirements. Points may be earned by implementing energy efficiency and alternative energy (solar, wind, etc.) into project designs.
- i. The City will work with developers during project planning and permitting process with all these considerations in mind to explore opportunities to incorporate renewable energy when feasible.

AUAR Item 19. Noise Mitigation Strategies:

- a. The AUAR area would be developed, such that where feasible, land use activities sensitive to noise would be appropriately setback from existing noise sources with the intent to sufficiently reduce the potential for noise impacts. Additionally, landscape buffers would be required to be implemented where differing land uses occur in accordance with Chapter 50-25.5 of the City's Legislative Code. Setback distances and potential mitigation measures should be reviewed relative to the sensitive receptors, described in the above section, to determine the potential for the project to exceed state noise standards.
- b. Future proposers would be advised to coordinate with the MPCA and MnDOT during project development and planning, as needed, to review roadway noise levels and setbacks. Noise modeling is an effective way to plan land use and development and is encouraged in the planning and engineering stages of the future development. Conducting baseline noise monitoring, in addition to modeling, may also be beneficial to ensure compliance with state noise standards.
- c. Per Minnesota Statute 116.07, Subd. 2a, existing or newly constructed segments of road or highway under local jurisdiction are exempt from State noise standards, except for roadways for which full control of access has been acquired. If required per MnDOT guidance, traffic noise analysis shall be conducted to model the existing and build condition near the AUAR area. The traffic noise modeling will be completed using the FHWA Traffic Noise Model (TNM).
- d. Where feasible, equipment used for any future construction-related activities should be fitted with the appropriate mufflers.
- e. Construction contractors would be required to comply with rock blasting and vibration control requirements in accordance with the City's 2019 Standard Construction Specifications, which includes compliance with Occupational Safety and Health Administration (OSHA) Safety and Health Standards 29 CFR, Part 1926, Subpart U (Blasting and Use Explosives). All blasting

operations are required to be performed in accordance with the provisions of the City's Standard Construction Specifications and all other applicable federal, state, and local regulations. A Blasting Plan is required to be submitted not less than three weeks prior to any drilling or blasting operations to the City Engineer.

- f. Additional mitigation measures outlined in the California Department of Transportation (Caltrans) Transportation and Construction Vibration Guidance Manual (2020)² may be applied to minimize adverse impacts of vibration and air overpressure associated with blasting. These measures include, but are not limited to, conducting a pre-blast survey, informing the public about any blasting activities, and avoiding blasting during windy conditions.

AUAR Item 20. Transportation Mitigation Strategies:

- a. Under 2025 Build conditions, movements and intersections operate largely the same as the 2025 No-Build scenario with no changes to LOS results during the a.m. and p.m. peak hours due to the proposed Phase 1 development. Therefore, no mitigation is needed for the proposed Phase 1 development.
- b. An updated traffic evaluation should be completed as part of the future AUAR update, required every five years, or at the time that future development phases are proposed that substantially exceed the initial Phase 1, whichever occurs first to determine if mitigation measures are needed.

² Caltrans. 2020. Transportation and Construction Vibration Guidance Manual. Available at: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf>. Accessed January 2024.