ILLINGWORTH & RODKIN, INC.
Acoustics • Air Quality
429 East Cotati Avenue
Cotati, CA 94931

Memo

Date: March 14, 2019

To: Caroline Weston
David J. Powers & Associates, Inc.

From: Michael Thill
Illingworth & Rodkin, Inc.

SUBJECT: **605 South Second Street Hotel Project, San José, California**
(IR Job # 18-198)

This memo has been prepared to describe the potential noise and vibration impacts resulting from the construction of a hotel at 605 South Second Street in San José, California. Potential noise impacts associated with the operation of the emergency generator proposed at the southwest corner of the project site are also described.

Project Description

The project proposes to construct a 90,263 square-foot, seven-story, 109 room hotel in downtown San José. The project would provide 39 parking spaces in a two-level underground garage. Access to the site would be provided from a driveway entrance on South Second Street.

Regulatory Criteria – Construction Noise and Vibration

City of San José General Plan policies related to construction noise and vibration include the following:

EC-1.7 Require construction operations within San José to use best available noise suppression devices and techniques and limit construction hours near residential uses per the City's Municipal Code. The City considers significant construction noise impacts to occur if a project located within 500 feet of residential uses or 200 feet of commercial or office uses would:

- Involve substantial noise generating activities (such as building demolition, grading, excavation, pile driving, use of impact equipment, or building framing) continuing for more than 12 months.

- For such large or complex projects, a construction noise logistics plan that specifies hours of construction, noise and vibration minimization measures, posting or notification of construction schedules, and designation of a noise

disturbance coordinator who would respond to neighborhood complaints will be required to be in place prior to the start of construction and implemented during construction to reduce noise impacts on neighboring residents and other uses.

EC-2.3 Require new development to minimize vibration impacts to adjacent uses during demolition and construction. For sensitive historic structures, a vibration limit of 0.08 in/sec PPV (peak particle velocity) will be used to minimize the potential for cosmetic damage to a building. A vibration limit of 0.20 in/sec PPV will be used to minimize the potential for cosmetic damage at buildings of normal conventional construction.

Chapter 20.100.450 of the City of San José Municipal Code establishes allowable hours of construction within 500 feet of a residential unit between 7:00 am and 7:00 pm Monday through Friday unless permission is granted with a development permit or other planning approval. No construction activities are permitted on the weekends at sites within 500 feet of a residence.

Regulatory Criteria – Generator Noise

City of San José General Plan policies related to operational noise include the following:

EC-1.2 Minimize the noise impacts of new development on land uses sensitive to increased noise levels (Categories 1, 2, 3 and 6) by limiting noise generation and by requiring use of noise attenuation measures such as acoustical enclosures and sound barriers, where feasible. The City considers significant noise impacts to occur if a project would:

- Cause the DNL at noise sensitive receptors to increase by five dBA DNL or more where the noise levels would remain "Normally Acceptable"; or
- Cause the DNL at noise sensitive receptors to increase by three dBA DNL or more where noise levels would equal or exceed the "Normally Acceptable" level.

EC-1.3 Mitigate noise generation of new nonresidential land uses to 55 dBA DNL at the property line when located adjacent to existing or planned noise sensitive residential and public/quasi-public land uses.

Significance Thresholds

Paraphrasing from Appendix G of the CEQA Guidelines, a project would normally result in significant noise impacts if noise levels generated by the project conflict with adopted environmental standards or plans, if the project would generate excessive groundborne vibration levels, or if ambient noise levels at sensitive receivers would be substantially increased over a permanent, temporary, or periodic basis. The following criteria were used to evaluate the significance of noise and vibration resulting from the project:

- A significant noise impact would be identified if the project would expose persons to or generate noise levels that would exceed applicable noise standards presented in the General Plan or Municipal Code.

- A significant noise impact would be identified if construction-related noise would temporarily increase ambient noise levels at sensitive receptors. Hourly average noise levels exceeding 60 dBA L_{eq}, and the ambient by at least 5 dBA L_{eq}, at the property lines shared with residential land uses for a period of more than one year would constitute a significant temporary noise increase. Hourly average noise levels exceeding 70 dBA L_{eq}, and the ambient by at least 5 dBA L_{eq}, at the property lines shared with commercial land uses for a period of more than one year would also constitute a significant temporary noise increase.

- A significant impact would be identified if the construction of the project would expose persons to excessive vibration levels. Groundborne vibration levels exceeding 0.2 in/sec PPV would have the potential to result in cosmetic damage to normal buildings. Groundborne vibration levels exceeding 0.08 in/sec PPV would have the potential to result in cosmetic damage to sensitive historic structures.

Construction Noise Impacts

Chapter 20.100.450 of the City's Municipal Code establishes allowable hours of construction within 500 feet of a residential unit between 7:00 am and 7:00 pm Monday through Friday unless permission is granted with a development permit or other planning approval. No construction activities are permitted on the weekends at sites within 500 feet of a residence. This analysis assumes that construction activities will occur only during the allowable hours, consistent with the Municipal Code limits.

The significance of temporary noise increases resulting from construction depend upon the noise levels generated by various pieces of construction equipment, the timing and duration of noise-generating activities, the distance between construction noise sources and noise-sensitive areas, and the presence of intervening shielding features such as buildings or terrain. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction lasts over extended periods of time. Hourly average noise levels exceeding 60 dBA L_{eq}, and the ambient by at least 5 dBA L_{eq}, at the property lines shared with residential land uses for a period of more than one year would constitute a significant temporary noise increase. Hourly average noise levels exceeding 70 dBA L_{eq}, and the ambient by at least 5 dBA L_{eq}, at the property lines shared with commercial land uses for a period of more than one year would also constitute a significant temporary noise increase.

Construction activities generate considerable amounts of noise, especially during earth-moving activities when heavy equipment is used. The construction of the proposed project would involve grading, excavation to lay foundations, trenching, building erection, and paving. The hauling of imported and exported soil and materials would generate truck trips on local roadways as well. During each stage of construction, there would be a different mix of equipment operating, and noise levels would vary by stage and vary within stages, based on the amount of equipment in

operation and the location at which the equipment is operating. Typical construction noise levels at 50 feet are shown in Tables 1 and 2. Table 1 shows the average noise level ranges, by construction phase, and Table 2 shows the maximum noise level ranges for different construction equipment. Most construction noise falls with the range of 80 to 90 dBA at 50 feet from the source.

The US Department of Transportation, Federal Highway Administration's, Roadway Construction Noise Model (RCNM v. 1.1) was used to model construction noise levels produced by construction equipment operating at the project site. The inputs to the model were based on CALEEMOD estimates for the default number and type of equipment expected for similar sized projects. The typical hourly average construction-generated noise levels were calculated considering the distance from the center of the construction site to the nearest receptors.

The nearest noise-sensitive land uses are single- and multi-family residential land uses and Lima-Campagna-Alameda Mission Chapel. From the center of the project site (i.e., the acoustic center of the construction noise area), these land uses are located 50 feet south, 80 feet west, 150 feet east (opposite South Second Street) and northwest (opposite East Reed Street) of the center of the site. Commercial receptors are located 90 feet west and 150 feet north as measured from the center of the project site. Receptors located near local roadways such as East Reed Street or South Second Street are exposed to ambient average daytime noise levels ranging from 65 to 73 dBA L_{eq} and DNL noise levels of about 74 dBA[1]. Ambient average daytime noise levels range from 61 to 71 dBA L_{eq}[2] at receptors near Interstate 280 but away from local roadways. DNL noise levels at these receptors are approximately 68 dBA.

Based on the RCNM output, hourly average noise levels due to activities during busy construction periods would range from about 74 to 86 dBA L_{eq} at 50 feet. Construction-generated noise levels drop off at a rate of about 6 dBA per doubling of the distance between the source and receptor. At 150 feet, construction noise levels would range from 64 to 76 dBA L_{eq}. Construction noise levels at receptors within about 500 feet of the site would be expected to exceed the significance thresholds periodically throughout the duration of the project, which is currently estimated to last approximately 14 months. Per Policy EC-1.7 of the City's General Plan, the temporary construction impact would be potentially significant.

[1] Environmental Noise Assessment, 598 South First Street Residential Development, Illingworth & Rodkin, Inc., March 8, 2013.
[2] Environmental Noise Assessment, The Pierce Mixed Use Residential Development, Illingworth & Rodkin, Inc., May 9, 2013.

TABLE 1 Typical Ranges of Construction Noise Levels at 50 Feet, L_{eq} (dBA)

	Domestic Housing		Office Building, Hotel, Hospital, School, Public Works		Industrial Parking Garage, Religious Amusement & Recreations, Store, Service Station		Public Works Roads & Highways, Sewers, and Trenches	
	I	II	I	II	I	II	I	II
Ground Clearing	83	83	84	84	84	83	84	84
Excavation	88	75	89	79	89	71	88	78
Foundations	81	81	78	78	77	77	88	88
Erection	81	65	87	75	84	72	79	78
Finishing	88	72	89	75	89	74	84	84

I - All pertinent equipment present at site.
II - Minimum required equipment present at site.

Source: U.S.E.P.A., Legal Compilation on Noise, Vol. 1, p. 2-104, 1973.

TABLE 2 Construction Equipment 50-foot Noise Emission Limits

Equipment Category	L_{max} Level (dBA)[1,2]	Impact/Continuous
Arc Welder	73	Continuous
Auger Drill Rig	85	Continuous
Backhoe	80	Continuous
Bar Bender	80	Continuous
Boring Jack Power Unit	80	Continuous
Chain Saw	85	Continuous
Compressor[3]	70	Continuous
Compressor (other)	80	Continuous
Concrete Mixer	85	Continuous
Concrete Pump	82	Continuous
Concrete Saw	90	Continuous
Concrete Vibrator	80	Continuous
Crane	85	Continuous
Dozer	85	Continuous
Excavator	85	Continuous
Front End Loader	80	Continuous
Generator	82	Continuous
Generator (25 KVA or less)	70	Continuous
Gradall	85	Continuous
Grader	85	Continuous
Grinder Saw	85	Continuous
Horizontal Boring Hydro Jack	80	Continuous
Hydra Break Ram	90	Impact
Impact Pile Driver	105	Impact
Insitu Soil Sampling Rig	84	Continuous

Equipment Category	L_{max} Level (dBA)[1,2]	Impact/Continuous
Jackhammer	85	Impact
Mounted Impact Hammer (hoe ram)	90	Impact
Paver	85	Continuous
Pneumatic Tools	85	Continuous
Pumps	77	Continuous
Rock Drill	85	Continuous
Scraper	85	Continuous
Slurry Trenching Machine	82	Continuous
Soil Mix Drill Rig	80	Continuous
Street Sweeper	80	Continuous
Tractor	84	Continuous
Truck (dump, delivery)	84	Continuous
Vacuum Excavator Truck (vac-truck)	85	Continuous
Vibratory Compactor	80	Continuous
Vibratory Pile Driver	95	Continuous
All other equipment with engines larger than 5 HP	85	Continuous

Notes:
1 Measured at 50 feet from the construction equipment, with a "slow" (1 sec.) time constant.
2 Noise limits apply to total noise emitted from equipment and associated components operating at full power while engaged in its intended operation.
3 Portable Air Compressor rated at 75 cfm or greater and that operates at greater than 50 psi.

Source: Mitigation of Nighttime Construction Noise, Vibrations and Other Nuisances, National Cooperative Highway Research Program, 1999.

Mitigation Measures:

Reasonable regulation of the hours of construction, as well as regulation of the arrival and operation of heavy equipment and the delivery of construction material, are necessary to protect the health and safety of persons, promote the general welfare of the community, and maintain the quality of life.

The City shall require the construction crew to adhere to the following construction best management practices to reduce construction noise levels emanating from the site and minimize disruption and annoyance at existing noise-sensitive receptors in the project vicinity to the extent feasible.

The applicant shall develop a construction noise control plan, including, but not limited to, the following available controls:

- In accordance with Policy EC-1.7 of the City's General Plan, utilize the best available noise suppression devices and techniques during construction activities.

- Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receiver and if the barrier is constructed in a manner that eliminates any cracks or gaps.

- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.

- Unnecessary idling of internal combustion engines should be strictly prohibited.

- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.

- Utilize "quiet" air compressors and other stationary noise sources where technology exists.

- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.

- A temporary noise control blanket barrier could be erected, if necessary, along building facades facing the construction site. This mitigation would only be necessary if conflicts occurred which were irresolvable by proper scheduling. Noise control blanket barriers can be rented and quickly erected.

- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.
- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.

- Notify in writing all adjacent business, residences, and other noise-sensitive land uses of the construction schedule.

- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

The construction noise control plan shall be implemented during all phases of construction activity to reduce the noise exposure of neighboring properties. Implementation of the above controls would reduce construction noise levels emanating from the site, minimizing disruption and annoyance. These controls, in combination with the limitations on hours set forth in the Municipal Code, would reduce the impact to a less-than-significant level.

Construction Vibration Impacts

Vibration would be produced by heavy equipment used during site preparation work, grading and excavation, trenching, and paving. Foundation construction techniques involving impact or vibratory pile driving, which can cause excessive vibration, are not anticipated as part of the project.

Policy EC-2.3 of the City of San José General Plan establishes a vibration limit of 0.08 in/sec PPV to minimize the potential for cosmetic damage to sensitive historic structures, and a vibration limit of 0.2 in/sec PPV to minimize damage at buildings of normal conventional construction. The vibration limits contained in this policy are conservative and designed to provide the ultimate level of protection for existing buildings in San José. Cosmetic damage (also known as threshold damage) is defined as hairline cracking in plaster, the opening of old cracks, the loosening of paint or the dislodging of loose objects. Minor damage is defined as hairline cracking in masonry or the loosening of plaster. Major structural damage is defined as wide cracking or the shifting of foundation or bearing walls.

A review of the City of San José Historic Resources Inventory[3] identified the following properties of historical significance within 100 feet of the project site:

- 618 South First Street, Palleson Building, 25 feet from project site
- 630 South First Street, Levin & Son Plumber Supply, 55 feet from project site
- 600 South Second Street, Mission Chapel, 90 feet from project site
- 623 South Second Street, Verdie Rental, 5 feet from project site.

Vibration levels would vary depending on soil conditions, construction methods, and equipment used. Table 3 presents typical vibration levels from construction equipment at 25 feet. Calculations were made to estimate vibration levels at distances of 5, 55, and 90 feet from the site to represent other nearby buildings. Vibration levels are highest close to the source, and then attenuate with increasing distance at the rate $(D_{ref}/D)^{1.1}$, where D is the distance from the source in feet and D_{ref} is the reference distance of 25 feet.

Project construction activities may generate substantial vibration in the immediate vicinity of historic properties adjoining the site. Some activities would occur at distances of about 5 feet, and at this distance, vibration levels due to construction are conservatively calculated to reach up to 1.2 in/sec PPV, which would exceed the 0.08 in/sec PPV threshold for historic buildings. Heavy vibration generating construction equipment, such as vibratory rollers or clam shovel drops, would have the potential to produce vibration levels of 0.08 in/sec PPV or more at historic buildings within 60 feet of the project site. This same equipment would have the potential to produce vibration levels of 0.2 in/sec PPV or more at buildings of normal conventional construction located within 25 feet of the project site.

[3] http://www.sanjoseca.gov/DocumentCenter/View/35475, accessed January 2019.

TABLE 3 Vibration Source Levels for Construction Equipment

Equipment		PPV at 5 ft. (in/sec)	PPV at 25 ft. (in/sec)	PPV at 55 ft. (in/sec)	PPV at 90 ft. (in/sec)
Clam shovel drop		**1.186**	**0.202**	**0.085**	0.049
Hydromill	in soil	0.047	0.008	0.003	0.002
(slurry wall)	in rock	**0.100**	0.017	0.007	0.004
Vibratory Roller		**1.233**	**0.210**	**0.088**	0.051
Hoe Ram		**0.523**	**0.089**	0.037	0.022
Large bulldozer		**0.523**	**0.089**	0.037	0.022
Caisson drilling		**0.523**	**0.089**	0.037	0.022
Loaded trucks		**0.446**	0.076	0.032	0.019
Jackhammer		**0.206**	0.035	0.015	0.009
Small bulldozer		0.018	0.003	0.001	0.001

Source: Transit Noise and Vibration Impact Assessment, United States Department of Transportation, Office of Planning and Environment, Federal Transit Administration, May 2006, as modified by Illingworth & Rodkin, Inc., January 2019.

The US Bureau of Mines has analyzed the effects of blast-induced vibration on buildings in USBM RI 8507[4], and these findings have been applied to vibrations emanating from construction equipment on buildings[5]. As shown on Figure 1, these studies indicate an approximate 20% probability of "threshold damage" (referred to as cosmetic damage elsewhere in this report) at vibration levels of 1.2 in/sec PPV or less and no observations of "minor damage" or "major damage" at vibration levels of 1.2 in/sec PPV or less. Cosmetic damage is defined as hairline cracking in plaster, the opening of old cracks, the loosening of paint or the dislodging of loose objects. Minor damage is defined as hairline cracking in masonry or the loosening of plaster. Major structural damage is defined as wide cracking or the shifting of foundation or bearing walls. Figure 1 presents the damage probability as reported in USBM RI 8507 and reproduced by Dowding assuming a maximum vibration level of 1.2 in/sec PPV. Based on these data, cosmetic or threshold damage would be manifested in the form of hairline cracking in plaster, the opening of old cracks, the loosening of paint or the dislodging of loose objects.

The project would have the potential to result in cosmetic/threshold damage at 623 South Second Street, 618 South First Street, and 630 South First Street. However, minor damage (e.g., hairline cracking in masonry or the loosening of plaster) or major structural damage (e.g., wide cracking or shifting of foundation or bearing walls) would not occur at these three properties assuming a maximum vibration level of up to 1.2 in/sec PPV. Neither cosmetic/threshold, minor, or major damage would occur at 600 South Second Street or any conventional buildings in the project vicinity.

At these locations, and in other surrounding areas where vibration would not be expected to cause structural damage, vibration levels may still be perceptible. However, as with any type of construction, this would be anticipated and would not be considered significant, given the intermittent and short duration of the phases that have the highest potential of producing vibration (use of jackhammers and other high-power tools). By use of administrative controls, such as notifying neighbors of scheduled construction activities and scheduling construction activities with

[4] Siskind, D.E., M.S. Stagg, J.W. Kopp, and C.H. Dowding, Structure Response and Damage Produced by Ground Vibration form Surface Mine Blasting, RI 8507, Bureau of Mines Report of Investigations, U.S. Department of the Interior Bureau of Mines, Washington, D.C., 1980.
[5] Dowding, C.H., Construction Vibrations, Prentice Hall, Upper Saddle River, 1996.

the highest potential to produce perceptible vibration during hours with the least potential to affect nearby businesses, perceptible vibration can be kept to a minimum.

In summary, the construction of the project would generate vibration levels exceeding the General Plan threshold of 0.08 in/sec PPV at three historic properties in the project vicinity (623 South Second Street, 618 South First Street, and 630 South First Street), and such vibration levels would be capable of cosmetically damaging these structures. Project-generated vibration levels would fall below the General Plan thresholds of 0.08 in/sec PPV at 600 South Second Street and below 0.2 in/sec PPV at other surrounding buildings of normal conventional construction located 30 feet or more from the project site. No damage would occur at these buildings because of the project.

Mitigation Measures:

Implement the following best available controls to reduce the impact to a less-than-significant level:

- A list of all heavy construction equipment to be used for this project known to produce high vibration levels (tracked vehicles, vibratory compaction, jackhammers, hoe rams, etc.) shall be submitted to the City by the contractor. This list shall be used to identify equipment and activities that would potentially generate substantial vibration and to define the level of effort for reducing vibration levels below the thresholds.

- Place operating equipment on the construction site as far as possible from vibration-sensitive receptors.

- Use smaller equipment to minimize vibration levels below the limits.

- Avoid using vibratory rollers and tampers near sensitive areas.
- Select demolition methods not involving impact tools.

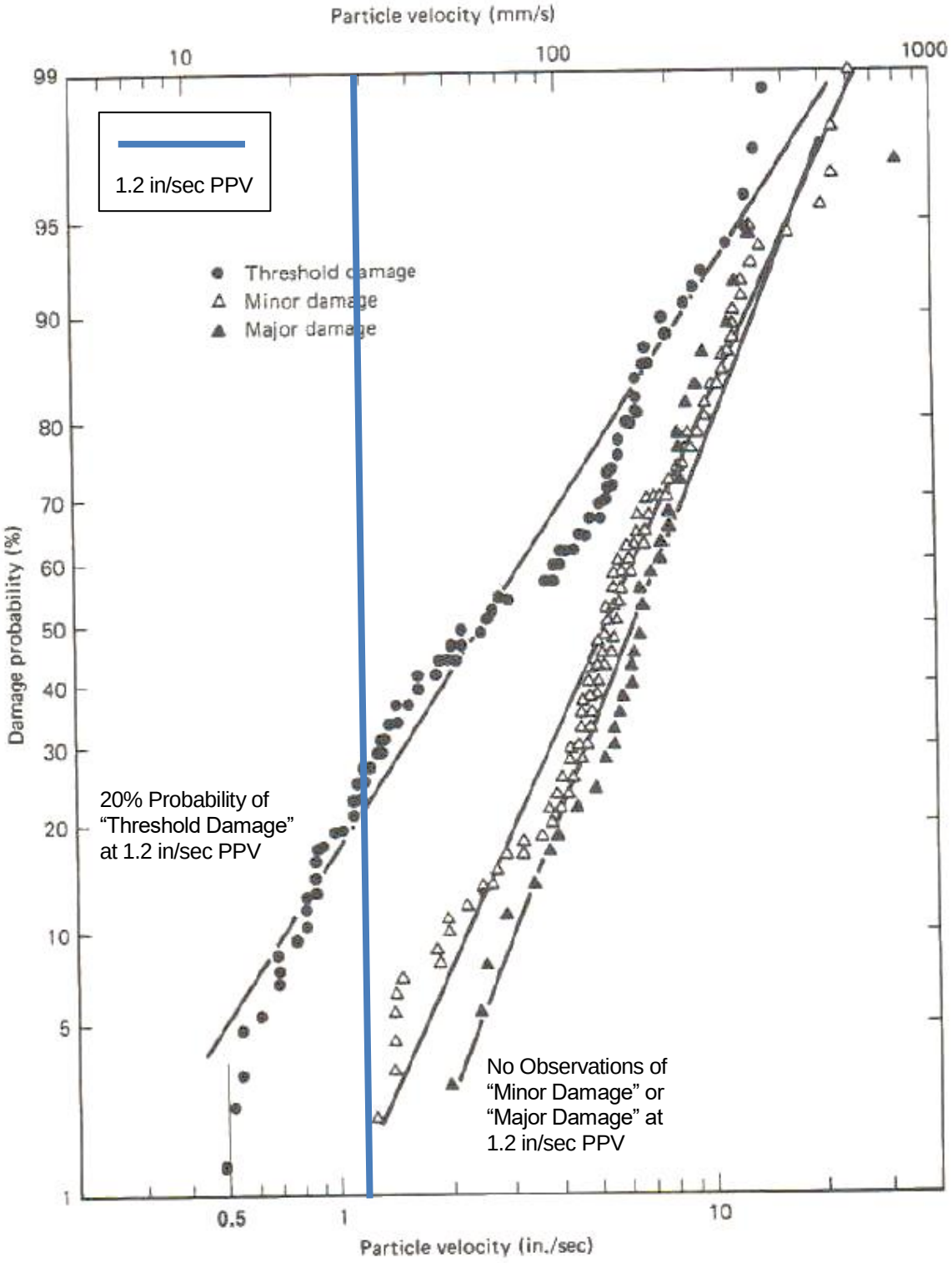
- Modify/design or identify alternative construction methods to reduce vibration levels below the limits.

- Avoid dropping heavy objects or materials.

- Perform a photo survey, elevation survey, and crack monitoring survey for each of the affected historic structures. Surveys shall be performed prior to construction, in regular interval during construction, and after completion of construction and shall include internal and external crack monitoring in structures, settlement, and distress and shall document the condition of foundations, walls and other structural elements in the interior and exterior of said structures. Make appropriate repairs or compensation where damage has occurred because of construction activities.

- Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted on the construction site.

FIGURE 1 Probability of Cracking and Fatigue from Repetitive Loading



Source: Dowding, C.H., Construction Vibrations, Prentice Hall, Upper Saddle River, 1996 as modified by Illingworth & Rodkin, Inc., January 2019.

Operational Noise Impacts – Generator Noise

The proposed diesel generator set (CAT C7.1, D-200-2) would be located at the southwest corner of the project site, approximately 3 feet from the southernmost site boundary, contiguous with residential land uses, approximately 25 feet from the nearest commercial land use to the west, and approximately 35 feet from the nearest residential land use to the west. The generator produces a sound level of 85 dBA at 3 feet and 75 dBA at 23 feet when fitted with a Level 2 sound attenuated enclosure. The testing schedule is not known at this time but typically takes place monthly for approximately one hour.

A solid 7.5-foot high wood fence is proposed along the south property line of the project site to acoustically screen the proposed generator from the residential land use located to the south. The solid 7.5-foot high wood fence proposed along the south property line would provide approximately 10 dBA noise reduction at residential receptors located within outdoor use areas. Open fencing, comprised primarily from 6x6 concrete posts of varying heights and a metal gate is proposed along the west boundary of the site. The open fencing would not provide measurable noise attenuation.

The generator would produce noise levels of approximately 72 dBA at the residential land use located south of the barrier assuming the attenuation with distance from the noise source and the attenuation provided by the intervening noise barrier. The noise level produced by the generator would just exceed the upper limit of the existing range of ambient noise levels produced by traffic along I-280 (61 to 71 dBA L_{eq}). Testing of the generator would likely occur once per month, during the daytime, and last one hour or less. Based on the above testing assumptions, the generator would produce a DNL noise level of 58 dBA at the residential land use located to the south of the barrier. The DNL produced by the generator would not measurably increase ambient DNL noise levels due to traffic along I-280 (currently 68 dBA DNL).

At the façade of the nearest commercial land use located west of the site, the generator would produce noise levels of approximately 75 dBA. The residential outdoor use area located west of the site would be exposed to noise levels of approximately 66 dBA assuming the attenuation provided by the noise barrier fence that exists along the 2nd Street frontage. Generator noise levels would exceed the upper end of the existing range of ambient noise levels resulting from I-280 traffic (61 to 71 dBA L_{eq}) by about 4 dBA at the façade of the nearest commercial land use but would fall within the range of ambient traffic noise levels at the shielded residential outdoor use area west of 2nd Street. Based on the testing assumptions described above, the generator would produce a DNL noise level of 61 dBA at the nearest commercial land use, increasing ambient DNL noise levels by less than 1 dBA. This change in DNL noise levels would not be perceptible. At the shielded residential outdoor use area west of 2nd street, DNL noise levels produced by the generator test would be 52 dBA. The generator test would not measurably increase ambient DNL noise levels at this residential receptor.

The DNL produced by monthly testing operations would not increase ambient noise levels by 3 dBA DNL or more at noise sensitive receptors in the project vicinity, consistent with the requirements of General Plan Policy EC-1.2. Similarly, monthly testing would not produce noise levels that would regularly exceed the 55 dBA DNL guideline established in General Plan Policy EC-1.3. In order to reduce the effects of the infrequent generator testing operations, it is recommended that adjacent land uses be notified of the proposed testing schedule, and that testing occur between the hours of 10:00 am and 4:00 pm in order to to avoid noise-sensitive morning and evening hours.