

1. Executive Summary

This chapter presents an overview of the proposed Comprehensive Plan Update and associated zoning amendments, herein referred to as “proposed Plan,” and identifies issues to be resolved, areas of controversy, and conclusions of the analysis contained in Chapters 4.0 through 4.14 of this Draft Environmental Impact Report (Draft EIR). For a complete description of the proposed Plan, its status, and the planning scenarios being analyzed to test potential outcomes of the ongoing planning process, please see Chapter 3, Project Description, of this Draft EIR.

This Draft EIR has been prepared pursuant to the requirements of CEQA (California Environmental Quality Act, California Public Resources Code, Division 13, Section 21000, *et seq.*) and the State CEQA Guidelines (Title 14 of the California Code of Regulations, Division 6, Chapter 3, Section 15000, *et seq.*) to determine the potential direct, indirect, and cumulative environmental impacts of the proposed Plan. Information for this Draft EIR was obtained from on-site field observations; discussions with affected agencies; analysis of adopted plans and policies; review of available studies, reports, data, and similar literature in the public domain; and specialized environmental assessments (e.g., air quality, hazards and hazardous materials, hydrology and water quality, noise, and transportation and traffic).

1.1 ENVIRONMENTAL PROCEDURES

This Draft EIR has been prepared pursuant to CEQA to assess the potential physical environmental effects associated with implementation of the proposed Plan, including adoption of implementing regulations and the overall impacts of growth and development over the life of the plan. The six main objectives of this document as established by CEQA are:

- To disclose to decision-makers and the public the significant environmental effects of proposed activities.
- To identify ways to avoid or reduce environmental damage.
- To prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
- To disclose to the public the reasons for agency approval of projects with significant environmental effects.
- To foster interagency coordination in the review of projects.
- To enhance public participation in the planning process.

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An EIR is the most comprehensive form of environmental documentation identified in the statutes and in the CEQA Guidelines. It provides the information needed to assess the environmental consequences of a proposed project, to the extent feasible. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant adverse environmental impacts. An EIR is also one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority.

This Draft EIR was prepared based on public “scoping” comments received in mid-2014 and is itself an opportunity for public review and comment. All substantive comments received on the Draft EIR must be responded to in a Final EIR, which may also contain necessary corrections/revisions to the Draft EIR’s text and analysis.

Prior to approving a proposed project, the lead agency must consider the information contained in the Final EIR, determine whether the Final EIR was properly prepared in accordance with CEQA and the CEQA Guidelines, determine that it reflects the independent judgment of the lead agency, adopt findings concerning the project’s significant environmental impacts and alternatives, and must adopt a Statement of Overriding Considerations if the proposed project would result in significant impacts that cannot be avoided.

1.1.1 REPORT ORGANIZATION

This Draft EIR is organized into the following chapters:

- **Chapter 1: Introduction.** Provides an overview describing the Draft EIR document.
- **Chapter 2: Executive Summary.** Summarizes environmental consequences that would result from adoption and implementation of the proposed Plan, describes recommended mitigation measures, and indicates the level of significance of environmental impacts before and after mitigation.
- **Chapter 3: Project Description.** Describes the proposed Plan and potential outcomes of the planning process by using four planning scenarios. Together they describe the characteristics, objectives, and structural and technical elements of the proposed action. The final Plan that is considered for adoption is expected to fall within the range of options described by the four planning scenarios, but will not be identical to any single one.
- **Chapter 4: Environmental Evaluation.** Organized into 14 sub-chapters corresponding to the environmental resource categories identified in Appendix G of the CEQA Guidelines, this chapter provides a description of the physical environmental conditions in the City of Palo Alto as they existed at the time the Notice of Preparation was published, from both a local and regional perspective, as well as an analysis of the potential environmental impacts of the four planning scenarios, and recommended mitigation measures, if required, to reduce their significance. The environmental setting included in each sub-chapter provides baseline physical conditions from which the Lead Agency determines the

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significance of environmental impacts resulting from the proposed Plan. Each sub-chapter also includes a description of the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the proposed Plan; and the potential cumulative impacts associated with the proposed Plan. Plan sub-chapters evaluate all four planning scenarios considered in this EIR.

- **Chapter 5: Significant Unavoidable Adverse Impacts.** Lists the significant and unavoidable impacts of the proposed Plan, as identified in Chapter 4.
- **Chapter 6: Alternatives to the Proposed Project.** This chapter discusses the “no build” alternative as required by CEQA and its relationship to the “no project” or “business as usual” alternative represented by Scenario 1. This chapter also explains how the four planning scenarios represent a reasonable range of options that address significant impacts of the proposed Plan to the extent feasible, and describes a potential hybrid alternative combining some of the slow growth features of Scenarios 2 or 3 with the sustainability-based features of Scenario 4.
- **Chapter 7: CEQA-Mandated Sections.** Discusses growth inducement, cumulative impacts, unavoidable significant effects, and significant irreversible changes as a result of the proposed Plan. Additionally, this chapter identifies environmental issues scoped out pursuant to CEQA Guidelines Section 15128.
- **Chapter 8: Organizations and Persons Consulted.** Lists the people and organizations that were contacted during the preparation of this EIR.
- **Appendices:** The appendices for this document (presented in PDF format on a CD attached to the back cover) contain the following supporting documents:
 - Appendix A: Notice of Preparation (NOP) and Comments on the NOP
 - Appendix B: Thresholds of Significance used in the Analysis
 - Appendix C: Air Quality and Greenhouse Gas Emissions Modeling
 - Appendix D: Cultural Resources
 - Appendix E: Hazardous Materials
 - Appendix F: Noise
 - Appendix G: Transportation Impact Analysis

1.1.2 “PROGRAM-LEVEL” EIR

According to Section 15121(a) of the CEQA Guidelines, the purpose of an EIR is to:

Inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

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Given the long-term horizon of the proposed Plan and the permitting, planning, and development actions that are related both geographically and as logical parts in the chain of contemplated actions for implementation, this Draft EIR has been prepared as a program-level EIR pursuant to Section 15168 of the CEQA Guidelines. As described in Section 15168, program EIRs are appropriate when a project consists of a series of actions related to the issuance of rules, regulations, and other planning criteria. Program EIRs look broadly at the implications of a wide range of actions, and do not provide detailed site-specific environmental assessment of every possible action under the plan or program. This means that the EIR will assess the potential impacts of all development expected to occur during the life of the Comprehensive Plan (generally between 2015 and 2030), and identify programmatic mitigation measures necessary to address potential impacts.

Once a program EIR has been certified, subsequent activities within the program must be evaluated to determine whether additional CEQA documentation needs to be prepared. When a program EIR is relied on for a subsequent activity, the lead agency must incorporate feasible mitigation measures and alternatives developed in the program EIR into the subsequent activities (CEQA Guidelines Section 15168[c][3]). If a subsequent activity would have effects not within the scope of a program EIR or the program EIR did not contain sufficient information to assess all of the effects associated with a specific action, the lead agency must prepare a new Initial Study leading to a Negative Declaration, Mitigated Negative Declaration, or an EIR. In this case, the program EIR serves a valuable purpose as the first-tier environmental analysis.

1.2 SUMMARY OF THE PROPOSED PLAN AND ALTERNATIVES

This EIR analyses adoption and implementation of an updated Comprehensive Plan for the City of Palo Alto, along with associated amendments to the zoning code. Under the proposed Plan, the overarching vision of the existing Comprehensive Plan would remain in place, and targeted changes would address new challenges posed by regional growth trends, changing demographics, and other challenges such as climate change. The EIR assesses potential impacts by examining four planning scenarios, which are meant to inform the policy choices inherent in the planning process and test various approaches to addressing the key issues of growth, transportation, housing, and sustainability. Brief descriptions of the four scenarios are included below:

- **Scenario One.** The first scenario reflects a State requirement to consider a “no project” alternative. In this scenario the City would not update its Comprehensive Plan, and would continue to operate under the existing plan. This “business as usual” scenario shows the results if the City continued to operate under the existing Comprehensive Plan with no changes to goals, policies and programs. Any new housing built would be constructed under existing zoning and no innovations in housing or new approaches to address the high cost of housing would be explored. No new growth management measures are anticipated, and any transit or traffic improvements would come from the existing infrastructure plan for the City. This scenario uses a local forecast of housing growth based on the

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City's past performance (a long term average of about 145 new dwelling units per year), and ABAG's 2013 projection of job growth.¹

- **Scenario Two.** The second scenario is designed to be the most aggressive in slowing the pace of job growth in the city, while testing concepts that encourage smaller housing units more appropriate for the city's workforce and its aging population than units that might be built under the "business as usual" scenario. Specifically, Scenario 2 would use a citywide annual limit on new office/research and development (R&D) development or another mechanism to control the pace of job growth and change in the city's commercial districts and job centers. No new housing sites not already identified in the Housing Element would be identified, and permitted residential densities would remain unchanged. Ongoing investments in the City's bicycle and pedestrian network would continue, but there would be no new transportation or transit initiatives except for improvements to the regional expressway system identified by in the County Expressway Plan.
- **Scenario Three.** The third scenario would implement a growth management regime similar to the interim annual limit on office/R&D adopted by the City Council in 2015 for the fastest changing areas of the city and would eliminate housing sites along San Antonio and South El Camino Real. In place of these housing sites, Scenario 3 would increase housing densities on housing sites Downtown, near California Avenue, and in other locations in the city close to transit and services. Policies, regulations, and incentives would be designed to ensure smaller units for the working professional and senior populations of the city. Transportation investments would include grade separating the Caltrain crossings at Meadow Drive and Charleston Road by placing the railroad tracks in a trench.
- **Scenario Four.** The fourth scenario assumes the most growth in housing and employment, consistent with ABAG's 2013 projections. Rather than moderating the pace of development, this scenario would seek to limit the impacts of development, and policies and regulations would be enacted to advance sustainability objectives. Similar to Scenario 3, housing sites along San Antonio and South El Camino Real would be eliminated, but in this case the sites would be replaced by new sites along the El Camino Real frontage of the Research Park and the Shopping Center. Significant investments would be made in transit services and incentives, including free transit passes for residents in transit-served areas, and major transportation investments would include grade separating the Caltrain crossings at Meadow Drive and Charleston Road by placing the railroad tracks in a trench, and incorporating mixed-flow Bus Rapid Transit (BRT) on El Camino Real.

By analyzing four planning scenarios within the body of the Draft EIR, this document analyzes alternatives that are designed to illuminate different potential environmental impacts and attain the proposed Plan objectives. Chapter 6, Alternatives, describes this approach, discusses the "no build" alternative, and a potential hybrid of the slow growth approach of Scenarios 2 or 3 with the sustainability-based policies of Scenario 4. There is no set methodology for comparing the alternatives or determining the environmentally superior alternative under CEQA. Identification of the environmentally superior alternative involves

¹ The City does not have the basis for a local forecast of job growth, and will have to rely on ABAG's forecast until the new business registry provides useful trend data.

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weighing and balancing all of the environmental resource areas by the City, and it is expected that this hybrid scenario—or some other, similar hybrid—will constitute the environmentally superior alternative when all feasible mitigation measures are included to reduce significant impacts to the extent feasible.

1.3 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR identify issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the proposed Plan, the major issues to be resolved include decisions by the City of Palo Alto, as Lead Agency, related to:

- How the policy choices illuminated by the four planning scenarios described in Chapter 3 will be resolved as the final proposed Plan takes shape during meetings of the Citizens' Advisory Committee and the City Council in 2016.
- Whether this Draft EIR adequately describes the environmental impacts of the proposed Plan that is ultimately considered for adoption, or whether the proposed Plan will be sufficiently different from the scenarios and hybrid described in this Draft EIR that the analysis in this Draft EIR will need to be supplemented prior to finalization.
- Whether the benefits of the proposed Plan override those environmental impacts that cannot be feasibly avoided or mitigated to a level of insignificance.
- How the proposed Plan can ensure that development anticipated to occur during the life of the Plan is fully compatible with the character of the existing area.
- Whether the identified mitigation measures should be adopted or modified.
- Whether there are other mitigation measures that should be applied to the proposed Plan besides those Mitigation Measures identified in the Draft EIR.
- Whether there are any alternatives to the proposed Plan that would substantially lessen any of the significant impacts of the proposed Plan and achieve most of the basic objectives.

1.4 AREAS OF CONTROVERSY

The City issued a Notice of Preparation (NOP) on May 30, 2014, and held scoping meetings on May 29, June 10, and June 24, 2014. A 30-day scoping period was provided for public agencies between May 30 and June 30, 2014. An extended scoping period through August 6, 2014 was provided for public to submit comments about the proposed Plan. Based on input received during the scoping period, the following is a list of issues that are likely to be of particular concern to agencies and interested members of the public during the environmental review process. While every environmental concern applicable to the CEQA process is addressed in this Draft EIR, this list is not necessarily exhaustive; rather, it attempts to capture

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those concerns that are likely to generate the greatest interest based on the input received during the scoping process.

- Visual resources including the views along Junipero Serra Boulevard and Page Mill Road.
- Air quality impacts related to greenhouse gas (GHG) emissions and toxic air contaminants.
- Impacts to historic buildings or other resources.
- Public health hazards from GHG emissions.
- Urban evacuation routes during emergency events.
- Impacts related to sea level rise and Regional Water Quality Control Plant.
- Stanford expansion impacts.
- Impacts to public service providers including police and fire.
- School impacts in partnership with Palo Alto Unified School District.
- Impacts on transit travel times.
- Downtown parking impacts.
- San Antonio Road cumulative traffic impacts.
- Vehicle miles traveled.
- Feasibility of Project alternatives.

1.5 SIGNIFICANT IMPACTS AND MITIGATION MEASURES

Under CEQA, a significant effect on the environment (i.e., significant impact) is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the EIR Study Area, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic and aesthetic significance.

The proposed Plan has the potential to generate significant environmental impacts in a number of areas. As shown in Table 1-1, some significant impacts would be reduced to a less-than-significant level if the mitigation measures identified in this Draft EIR are adopted and implemented. However, pursuant to Section 15126.2(b) of the CEQA Guidelines, which requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures, as shown in Table 1-1, significant unavoidable impacts were identified in the areas of air quality, noise and transportation and traffic. For a complete summary of the significant and unavoidable impacts, please see Chapter 5 of this Draft EIR. As described in detail in Chapter 7, the proposed Plan would have no significant impact on agricultural and forestry resources and mineral resources due to existing conditions in the City of Palo Alto. Accordingly, these topics have not been analyzed further in this Draft EIR.

Table 1-1 summarizes the conclusions of the environmental analysis contained in this Draft EIR and presents a summary of impacts and mitigation measures identified. It is organized to correspond with the environmental issues discussed in Chapters 4.1 through 4.14. The table is arranged in four columns: 1) impact; 2) significance before mitigation; 3) mitigation measure; and 4) significance after mitigation, with sub-columns for Scenarios 1 through 4. For a complete description of potential impacts, please refer to the specific discussions in Chapters 4.1 through 4.14.

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TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation				Mitigation Measure	Significance After Mitigation			
	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
Aesthetics and Visual Resources									
AES-1: Implementation of the proposed Plan would have the potential to substantially degrade the existing visual character or quality of the area and its surroundings.	LTS	LTS	PS	PS	<p>AES-1: The following policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that future development under Scenarios 3 and 4 would not degrade the visual character or quality of the area:</p> <ul style="list-style-type: none"> ▪ Policy: Promote high quality, creative design, and site planning that is compatible with surrounding development and public spaces. ▪ Policy: Preserve the character of residential neighborhoods by encouraging new or remodeled structures to be compatible with the neighborhood and adjacent structures. ▪ Policy: Maintain and enhance the University/ Downtown area as the central business district of the City, with a mix of commercial, civic, cultural, recreational, and residential uses. Promote quality design that recognizes the regional and historic importance of the area and reinforces its pedestrian character. ▪ Program: Review and revise as needed the Downtown, El Camino Real, and South of El Camino Real Design Guidelines to support and enhance the existing visual character of these neighborhoods with building forms and massing that relate to the street and the pedestrian, whether through traditional architectural forms or innovative new designs. ▪ Program: In areas of the City having a historic or consistent design character, design new development to maintain and support the existing character. 	LTS	LTS	LTS	LTS

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
AES-2: Implementation of the proposed Plan would not significantly alter public viewsheds or view corridors or scenic resources (such as trees, rocks, outcroppings, or historic buildings along a scenic highway).	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
AES-3: Implementation of the proposed Plan would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
AES-4: Implementation of the proposed Plan would have the potential to substantially shadow public open space (other than public open streets and adjacent sidewalks) between 9:00 a.m. and 3:00 p.m. from September 21 to March 21.	PS	PS	PS	PS	AES-4: The City shall develop an ordinance that will require development projects of a certain size or location to prepare an analysis of potential shade/shadow impacts. The ordinance shall focus on potential impacts to public open spaces (other than public streets and adjacent sidewalks) between 9:00 a.m. and 3:00 p.m. from September 21 to March 21. Projects that are shown to shadow open spaces during these times shall mitigate these impacts through building and site design features.	LTS	LTS	LTS	LTS
AES-5: Implementation of the proposed Plan would not contribute to cumulative aesthetics impacts in the area.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
Air Quality									
AIR-1: Without inclusion of air quality policies, implementation of the proposed Plan could conflict with or obstruct implementation of the applicable air quality plan.	PS	PS	PS	PS	AIR-1: The policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that it is consistent with the <i>2010 Bay Area Clean Air Plan</i> : <ul style="list-style-type: none"> ▪ Policy: Make land use decisions that encourage walking, bicycling, and public transit use. ▪ Policy: Reduce emission of particulates from wood burning stoves, construction activity, automobiles, 	LTS	LTS	LTS	LTS

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Impact	Significance Before Mitigation				Mitigation Measure	Significance After Mitigation			
	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					and other sources. <ul style="list-style-type: none"> Program: Locate higher density development near transit corridors and near multimodal transit stations. Support regional, State, and federal programs that improve air quality in the Bay Area. Program: Encourage infill, redevelopment, and re-use of vacant or underutilized parcels employing minimum density requirements that are appropriate to support transit, bicycling, and walking. Program: Promote mixed-use development to provide housing and commercial services near employment centers, thereby reducing the necessity of driving. 				
AIR-2: Implementation of the proposed Plan could violate an air quality standard; contribute substantially to an existing or project air quality violation; and/or result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).	S	S	S	S	AIR-2a: As part of the City’s development approval process, the City shall require applicants for future development projects to comply with the current BAAQMD basic control measures for reducing construction emissions of PM ₁₀ (Table 8-1, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the BAAQMD CEQA Guidelines).	SU	SU	SU	SU
					AIR-2b: Prior to issuance of construction permits, development project applicants that are subject to CEQA and have the potential to exceed the BAAQMD screening-criteria listed in the BAAQMD CEQA Guidelines shall prepare and submit to the City of Palo Alto a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with BAAQMD methodology in assessing air quality impacts. If construction-related criteria air pollutants are				

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					<p>determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in the BAAQMD CEQA Guidelines, the City of Palo Alto shall require that applicants for new development projects incorporate mitigation measures (Table 8-2, Additional Construction Mitigation Measures Recommended for Projects with Construction Emissions Above the Threshold, of the BAAQMD CEQA Guidelines or applicable construction mitigation measures subsequently approved by BAAQMD) to reduce air pollutant emissions during construction activities to below these thresholds. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the City and shall be verified by the City's Planning and Community Environment Department.</p>				
					<p>AIR-2c: Prior to issuance of construction permits, development project applicants that are subject to CEQA and have the potential to exceed the BAAQMD screening-criteria listed in the BAAQMD CEQA Guidelines shall prepare and submit to the City of Palo Alto a technical assessment evaluating potential project operation phase-related air quality impacts. The evaluation shall be prepared in conformance with BAAQMD methodology in assessing air quality impacts. If operational-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in BAAQMD's CEQA Guidelines, the City of Palo Alto Planning and Community Environment Department shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during operational activities.</p>				

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	1	2	3	4		1	2	3	4
					<p>AIR-2d: Implement Mitigation Measure TRANS-1a. In addition, the following policy and program, or equally effective language, shall be included in the proposed Plan to reduce long-term air quality impacts by emphasizing walkable neighborhoods and supporting alternative modes of transportation.</p> <ul style="list-style-type: none"> ▪ Policy: Encourage new residential, commercial and mixed-use development around transit stations, locations with bicycle and pedestrian connectivity, neighborhood-serving retail, and city services to allow residents and employees to meet daily needs without the use of the private automobile. ▪ Program: Promote mixed-use development to provide housing and commercial services near employment centers, thereby reducing the necessity of driving. 				
AIR-3: Implementation of the proposed Plan would expose sensitive receptors to substantial concentrations of air pollution.	PS	PS	PS	PS	<p>AIR-3a: Applicants for future non-residential land uses within the city that: 1) have the potential to generate 100 or more diesel truck trips per day or have 40 or more trucks with operating diesel-powered TRUs, and 2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, nursing homes), as measured from the property line of a proposed project to the property line of the nearest sensitive use, shall submit a health risk assessment (HRA) to the City of Palo Alto prior to future discretionary Project approval or shall comply with best practices recommended for implementation by the BAAQMD.</p> <p>The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment and the Bay Area Air Quality Management District. If the HRA shows that the</p>	LTS	LTS	LTS	LTS

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					<p>incremental cancer risk exceeds 10 in one million (10E-06), PM_{2.5} concentrations exceed 0.3 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms.</p> <p>Mitigation measures and best practices may include but are not limited to:</p> <ul style="list-style-type: none"> ▪ Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible. ▪ Electrifying warehousing docks. ▪ Requiring use of newer equipment and/or vehicles. ▪ Restricting off-site truck travel through the creation of truck routes. <p>Mitigation measures identified in the project-specific HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of a proposed project.</p>				
					<p>AIR-3b: Applicants for residential and other sensitive land use projects (e.g., hospitals, nursing homes, and day care centers) that are subject to CEQA within 1,000 feet of a major sources of TACs (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 10,000 vehicle per day), as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the City of Palo Alto prior to future discretionary Project approval or shall comply with best practices recommended by</p>				

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					<p>the BAAQMD.</p> <p>The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health Hazard Assessment (OEHHA) and the Bay Area Air Quality Management District. The latest OEHHA guidelines shall be used for the analysis, including age sensitivity factors, breathing rates, and body weights appropriate for children age zero to 16 years. If the HRA shows that the incremental cancer risk exceeds 10 in one million (10E-06), PM_{2.5} concentrations exceed 0.3 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below 10 in one million or a hazard index of 1.0), including appropriate enforcement mechanisms.</p> <p>Measures and/or best practices to reduce risk may include but are not limited to:</p> <ul style="list-style-type: none"> ▪ Air intakes located away from high volume roadways and/or truck loading zones. ▪ Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized Maximum Efficiency Rating Value (MERV) filters. <p>Mitigation measures identified in the HRA and best practices shall be incorporated into the site development plan as a condition of approval. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City's Planning and Community Environment Department.</p>				

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AIR-4: Implementation of the proposed Plan could create or expose a substantial number of people to objectionable odors unless policies are integrated into the proposed Plan.	PS	PS	PS	PS	AIR-4: The following policy, or equally effective language, shall be included in the proposed Plan to reduce odor impacts: <ul style="list-style-type: none"> Policy: All potential sources of odor and/or toxic air contaminants should be adequately buffered, mechanically or otherwise mitigated, to avoid odor and toxic impacts that violate human health standards. 	LTS	LTS	LTS	LTS
Biological Resources									
BIO-1: The proposed Plan would not have a substantial adverse effect, either directly or through habitat modifications, on special-status species.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
BIO-2: The proposed Plan would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, including federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
BIO-3: The proposed Plan would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
BIO-4: The proposed Plan would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or as defined by the City of Palo Alto's Tree Preservation Ordinance (Municipal Code Chapter 8.10).	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
BIO-5: The proposed Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
BIO-6: Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in a significant cumulative impact with respect to biological resources.	LTS	LTSL	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
Cultural Resources									
CULT-1: Implementation of the proposed Plan could adversely affect a historic resource listed or eligible for listing on the National and/or California Register, or listed on the City's Historic Inventory.	S	S	S	S	CULT-1a: The City shall prepare and adopt an ordinance that would regulate the demolition or alteration of a historic resource listed on the National and/or California Register, or listed on the City's Historic Inventory, if alterations would significantly alter the historic value and/or character defining features of the historic resource.	LTS	LTS	LTS	LTS
					CULT-1b: Include a program in the Comprehensive Plan Update requiring the City to update and maintain the City's Historic Resource Inventory to determine all historic resources that are eligible for the California Register as well as important examples of California history or prehistory. Historic resources may consist of a single building or structure or a district. Include a policy in the Comprehensive Plan requiring an				

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					evaluation prior to the issuance of a demolition or alterations permit, where proposed development would affect a potential historic resource that has not been evaluated for inclusion into the City’s Historic Resources Inventory.				
					<p>CULT-1c: The following policy and program, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not adversely affect a historic resource listed or eligible for listing on the National and/or California Register, or listed on the City’s Historic Inventory:</p> <ul style="list-style-type: none"> ▪ Policy: Protect Palo Alto’s archaeological resources, including natural land formations, sacred sites, the historical landscape, historic habitats, and remains of settlements here before the founding of Palo Alto in the nineteenth century. ▪ Program: Require that a records search of the California Historical Resources Information System be conducted and reviewed by a cultural resources professional for proposed new development to determine whether the site contains known prehistoric or historic cultural resources and the potential for as-yet-undiscovered cultural resources. 				
CULT-2: Implementation of the proposed Plan could eliminate important examples of major periods of California history or prehistory.	S	S	S	S	CULT-2: Implement Mitigation Measures CULT-1a, CULT-1b, and CULT-1c.	LTS	LTS	LTS	LTS
CULT-3: Implementation of the proposed Plan could damage to an important archaeological resource as defined in Section 15064.5 of the CEQA Guidelines.	S	PS	PS	PS	<p>CULT-3: The following policies, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not damage archaeological resources:</p> <ul style="list-style-type: none"> ▪ Policy: Protect Palo Alto’s archaeological resources, 	LTS	LTS	LTS	LTS

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					including natural land formations, sacred sites, the historical landscape, historic habitats, and remains of settlements here before the founding of Palo Alto in the nineteenth century. <ul style="list-style-type: none"> ▪ Policy: Require that a records search of the California Historical Resources Information System be conducted and reviewed by a cultural resources professional for proposed new development to determine whether the site contains known prehistoric or historic cultural resources and to determine the potential presence of as-yet-undiscovered cultural resources. ▪ Policy: Require that areas found to contain significant prehistoric artifacts be examined by a qualified consulting archaeologist for appropriate protection and preservation. ▪ Policy: Require that if cultural resources, including archaeological or paleontological resources, are uncovered during grading or other on-site excavation activities, construction shall stop until appropriate mitigation is determined and implemented. ▪ Policy: Require that any archaeological or paleontological resources on a development project site, as a condition of project approval, be either preserved at their location or adequately documented as a condition of removal. When a development project has sufficient flexibility, avoidance and preservation of the resource shall be the primary mitigation measure, unless the City identifies a superior mitigation. If resources are documented, their preservation should be coordinated with descendants and/or stakeholder 				

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	1	2	3	4		1	2	3	4
					groups, as warranted. <ul style="list-style-type: none"> Policy: Continue to consult with tribes as required by California Government Code Section 65352.3. In doing so, use appropriate procedures to accommodate tribal concerns when a tribe has a religious prohibition against revealing precise information about the location or previous practice at a particular sacred site. 				
CULT-4: Implementation of the proposed Plan would not disturb any human remains, including those interred outside of formal cemeteries.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
CULT-5: Implementation of the proposed Plan would have the potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	S	PS	PS	PS	CULT-5: The following policies, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not damage paleontological resources: <ul style="list-style-type: none"> Policy: Require that areas found to contain significant prehistoric artifacts be examined by a qualified consulting archaeologist for appropriate protection and preservation. Policy: Require that if cultural resources, including archaeological or paleontological resources and unique geologic features, are uncovered during grading or other on-site excavation activities, construction shall stop until appropriate mitigation is determined and implemented. Policy: Require that any archaeological or paleontological resources on a development project site, as a condition of project approval, be either preserved at their location or adequately documented as a condition of removal. When a development project has sufficient flexibility, 	LTS	LTS	LTS	LTS

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					avoidance and preservation of the resource shall be the primary mitigation measure, unless the City identifies a superior mitigation. If resources are documented, their preservation should be coordinated with descendants and/or stakeholder groups, as warranted.				
CULT-6: Implementation of the proposed Plan would directly or indirectly destroy a local cultural resource that is recognized by City Council resolution.	S	S	S	S	CULT-6: Implement Mitigation Measures CULT-1a, CULT-1b, and CULT-1c.	LTS	LTS	LTS	LTS
CULT-7: Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in significant cumulative impacts with respect to cultural resources.	S	S	S	S	CULT-7: Implement Mitigation Measures CULT-1a, CULT-1b, CULT-1c, CULT-3, and CULT-5.	LTS	LTS	LTS	LTS
Geology, Soils, and Seismicity									
GEO-1: Implementation of the proposed Plan would not expose people or structures to substantial adverse effects including the risk of loss, injury or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure (including liquefaction), landslides, or expansive soil.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
GEO-2: Implementation of the proposed Plan would not expose people or property to major geologic hazards that cannot be mitigated through the use of standard engineering design and seismic safety techniques.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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	1	2	3	4		1	2	3	4
GEO-3: Future development allowed by the proposed Plan would not be located on a geologic unit or on soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
GEO-4: Implementation of the proposed Plan would not cause substantial erosion or siltation.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
GEO-5: Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to geology, soils, and seismicity.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
Greenhouse Gas Emissions and Climate Change									
GHG-1: The proposed Plan would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
GHG-2: The proposed Plan could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, requiring mitigation.	S	S	S	S	GHG-2: To ensure that Palo Alto’s GHG emissions are reduced consistent with the State’s long-term goals, the proposed Plan should contain the following policy and program, or equally effective language, articulating these goals and ensuring steady progress towards their achievement: <ul style="list-style-type: none"> ▪ Policy: Strive to achieve and exceed target reductions in greenhouse gas emission levels set forth by Executive Order S-03-05. ▪ Program: Adopt an updated GHG emission reduction plan as part of the S/CAP aimed at achieving or 	SU	SU	SU	SU

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	1	2	3	4		1	2	3	4
					<p>exceeding the State’s goals, and monitor the City’s progress on an annual basis.</p> <p>GHG reduction policies included in the S/CAP, which is being prepared in conjunction with proposed Plan, would ensure substantial progress toward the long-term GHG reduction goals of Executive Order S-03-05. However, at this time, additional State and federal actions, as well as advances in technology, are necessary to achieve the deep cuts required to meet the 2050 emissions target. These actions are beyond the jurisdiction of the City of Palo Alto and therefore it is unclear whether the City alone can mitigate this impact to a less-than-significant level.</p>				
GHG-3: The proposed Plan would expose people or structures to the physical effects of climate change, including but not limited to flooding, extreme temperatures, public health, wildfire risk, or other impacts resulting from climate change, requiring mitigation.	S	S	S	S	<p>GHG-3: To address the potential impacts associated with exposing additional people to the effects of climate change, the proposed Plan should include the following policies and programs, or equally effective language, to ensure that future development would address potential risks and that the City would work with other agencies to coordinate strategies for minimizing risk, ensuring appropriate response/recovery, and planning for resiliency:</p> <ul style="list-style-type: none"> ▪ Policy: Monitor and respond to the risk of flooding caused by climate change that may result in changes to precipitation patterns, sea level rise, and storm surges. ▪ Policy: Promote and participate in cooperative planning with other public agencies and regional and adjacent jurisdictions, especially regarding issues related to climate change, such as water supply, sea level rise, fire protection services, emergency medical services, and emergency response planning. ▪ Program: Develop and implement “green 	SU	SU	SU	SU

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					<p>infrastructure” practices to mitigate flooding through improved permeability or paved areas, and storm water capture and storage.</p> <ul style="list-style-type: none"> Program: Regularly coordinate with regional, State, and federal agencies on rising sea levels in the San Francisco Bay and major tributaries to determine if additional adaptation strategies should be adopted to address flooding hazards from increased sea levels for existing or new development and infrastructure. This includes monitoring Federal Emergency Management Agency flood map updates to identify areas in the city susceptible to sea level rise, addressing changes to State and regional sea and bay level rise estimates, and coordinating with adjacent municipalities on flood control improvements as appropriate. Program: Prepare response strategies that address sea level rise and increased flooding, and other events related to climate change, such as increased flooding, landslides, soil erosion, wildfires, and storm events. Include response strategies to address sea level rise on Palo Alto’s levee system. Program: Develop new development requirements for shoreline development to ensure that new development is designed and located to provide protection from potential impacts of flooding resulting from sea level rise and significant flood events. Requirements may include: new setbacks to ensure to structures are set back far enough inland that they will not be endangered by erosion; limits on subdivisions and lot line adjustments in areas vulnerable to sea level rise to avoid the creation of 				

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					new shoreline lots; incentive or transfer of development rights (TDR) programs to relocate existing development away from high risk areas; and/or triggers for relocation or removal of existing structures based on changing site conditions and other factors.				
Hazards and Hazardous Materials									
HAZ-1: The proposed Plan would not create a significant hazard to the public or the environment as a result of the routine transport, use, or disposal of hazardous materials.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HAZ-2: The proposed Plan would not create a significant hazard to the public or the environment through reasonable upset and accident conditions involving the release of hazardous materials into the environment.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HAZ-3: The proposed Plan would not result in hazardous emissions or the handling of hazardous or acutely hazardous material, substances or, waste within ¼-mile of an existing or proposed school.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HAZ-4: The proposed Plan would not create a significant hazard to the public or the environment from existing hazardous materials contamination by exposing future occupants or users of the site to contamination either in excess of soil and groundwater cleanup goals developed for the site or from location on listed hazardous materials sites compiled pursuant to Government Code Section 65962.5.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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	1	2	3	4		1	2	3	4
HAZ-5: The proposed Plan would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HAZ-6: The proposed Plan would not result in a safety hazard from a public airport for people residing or working within the Plan area.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HAZ-7: The proposed Plan would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HAZ-8: The proposed Plan would not result in a safety hazard for people residing or working within the vicinity of a private airstrip in the Plan area.	NI	NI	NI	NI	No impact.	NI	NI	NI	NI
HAZ-9: The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to hazards and hazardous materials.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
Hydrology and Water Quality									
HYD-1: The proposed Plan would not violate any water quality standards or waste discharge requirements.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HYD-2: The proposed Plan could substantially degrade or deplete ground water resources or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.	PS	PS	PS	PS	HYD-2: The City shall continue to investigate the potential impacts of basement construction dewatering and update standard conditions of approval to contain the following or equally effective measures: <ul style="list-style-type: none"> ▪ Prohibit dewatering during the rainy season. ▪ Encouraging greater fill station use by distributing more door-hangers and enlisting other public 	LTS	LTS	LTS	LTS

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					outreach regarding dewatering, fill stations, and trees. <ul style="list-style-type: none"> ▪ Strengthening outreach on the water cycle and value of fresh water flows to storm drains, creeks, and the Bay. ▪ Refining requirements for contractor Use Plans, including maximizing on-site water use, one day/week water truck hauling service for neighbors, and City landscaping and piping to nearby parks or major users where feasible. ▪ Expanding fill station specifications to address water pressure issues resulting from multiple concurrent users, including separate pumps for neighbors where needed and sidewalk bridges for hoses to prevent tripping hazards. ▪ Broadening the City’s Basement Pumping Guidelines to require a determination of the impacts of groundwater pumping on adjacent buildings, infrastructure, and trees or landscaping. Applicants would determine the size of the temporary cone of depression caused by pumping and avoidance measures would be required if impacts are anticipated. The Urban Forestry staff may develop guidelines for soil enhancement and supplemental watering (by project applicant) for neighboring landscaping. Additional measures could include adjusting the location, depth, or duration of pumping or altering construction methods. 				
HYD-3: The proposed Plan would not substantially increase the rate, volume, or flow duration of storm water runoff or alter the existing drainage pattern of the site or	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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	1	2	3	4		1	2	3	4
area, including altering the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, including increased in-stream erosion.									
HYD-4: The proposed Plan would not result in stream bank instability.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HYD-5: The proposed Plan would not significantly increase the rate, volume, or flow duration of storm water runoff in a manner which would result in new or increased flooding on-or off-site, or exceedance of the capacity of existing or planned stormwater drainage systems in local streams.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HYD-6: The proposed Plan would not provide substantial additional sources of pollutants associated with urban runoff or otherwise substantially degrade surface or ground water quality.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HYD-7: The proposed Plan would not substantially impede or redirect flood flows through placement of structures within the 100-year flood hazard area.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HYD-8: The proposed Plan would not expose people or structures to a significant risk or loss, injury or death involving flooding by placing housing or other development within a 100-year flood hazard area or a levee or dam failure inundation area.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
HYD-9: The proposed Plan would not be impacted by inundation by seiche, tsunami, or mudflow.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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HYD-10: The Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to hydrology and water quality.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
Land Use and Planning									
LAND-1: The proposed Plan could adversely change the type or intensity of existing or planned land use patterns in the area.	LTS	LTS	PS	PS	<p>LAND-1: Include policies and programs in the proposed Plan to ensure that the intensity of future development under Scenarios 3 and 4 would not adversely change the land use patterns or affect the quality of life in Palo Alto neighborhoods. This could be accomplished by maintaining existing Comp Plan policies related to compatibility and quality of life in the area:</p> <ul style="list-style-type: none"> ▪ Policy: Maintain Palo Alto’s varied residential neighborhoods while sustaining the vitality of its commercial areas and public facilities. Use the Zoning Ordinance as a tool to enhance Palo Alto’s desirable qualities. ▪ Policy: Evaluate changes in land use in the context of regional needs, overall city welfare and objectives, and the desires of surrounding neighborhoods. ▪ Policy: Promote increased compatibility, interdependence, and support between commercial and mixed-use centers and the surrounding residential neighborhoods. ▪ Program: Encourage greater use of allowed density within zoning regulations through smaller housing units near multimodal transit stations to take advantage of transit availability. 	LTS	LTS	LTS	LTS
LAND-2: The proposed Plan would allow development that could be incompatible with adjacent land uses or with the general	LTS	LTS	PS	PS	LAND-2: The following policies and programs, or equally effective language, should be included in the proposed Plan to further reduce potential impacts to visual	LTS	LTS	LTS	LTS

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	1	2	3	4		1	2	3	4
character of the surrounding area, including density and building height.					character and ensure compatibility with adjacent land uses: <ul style="list-style-type: none"> Policy: Where possible, avoid abrupt changes in scale and density between residential and non-residential areas and between residential areas of different densities. To promote compatibility and gradual transitions between land uses, place zoning district boundaries at mid-block locations rather than along streets wherever possible. Policy: Preserve the character of residential neighborhoods by encouraging new or remodeled structures to be compatible with the neighborhood and adjacent structures. Policy: Promote high quality, creative design and site planning that is compatible with surrounding development and public spaces. Program: Maintain and periodically review height and density limits to discourage single uses that are inappropriate in size and scale to the surrounding uses. Program: Review and change zoning regulations to promote gradual transitions in the scale of development where residential districts abut more intense uses. Program: Use the Zoning Ordinance, design review process, design guidelines, and Coordinated Area Plans to ensure high-quality residential and commercial design. 				
LAND-3: The proposed Plan would allow development that could conflict with established residential, recreational,	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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	1	2	3	4		1	2	3	4
educational, religious, or scientific uses of an area.									
LAND-4: The proposed Plan would allow new development that could conflict with any applicable City land use plan, policy or regulation (including, but not limited to the Comprehensive Plan, coordinated area plan, or the City's Zoning Ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
LAND-5: The proposed Plan could physically divide an established community.	PS	PS	PS	PS	<p>LAND-5: To avoid potential impacts from physically dividing an established community, the proposed Plan shall include the following policies, or equally effective policies:</p> <ul style="list-style-type: none"> ▪ Policy: Design future transportation projects (including roadway, bicycle, pedestrian, and transit projects) to improve connections between and within neighborhoods, rather than divide neighborhoods. ▪ Policy: Pursue a below-grade alignment and not an elevated alignment for regional fixed rail in Palo Alto, including both high speed rail and Caltrain. ▪ Policy: Ensure that future grade separation projects include a community participation and review process, and undergo environmental review. Future grade separation improvement projects would have the potential to cause environmental impacts, such as impacts associated with construction-related emissions, noise, and traffic, and aesthetics and land use impacts. These impacts, and alternatives to these grade separation projects, would be evaluated in detail when the projects are more clearly defined. 	LTS	LTS	LTS	LTS

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LAND-6: The proposed Plan would not conflict with an applicable habitat conservation plan or natural community plan.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
LAND-7: Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to land use and planning.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
Noise									
NOISE-1: Implementation of the proposed Plan would have the potential to cause the average 24-hour noise level (L_{dn}) to increase by 5.0 decibels (dB) or more in an existing residential area, even if the L_{dn} would remain below 60 dB.	LTS	PS	PS	PS	<p>NOISE-1a: The following policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that long-term operational noise under Scenarios 2, 3, and 4 would not result in significant increases in average 24-hour noise levels.</p> <ul style="list-style-type: none"> ▪ Policy: Encourage the location of land uses in areas with compatible noise environments. Use the guidelines in the table “Land Use Compatibility for Community Noise Environment” to determine compatibility. – For exterior noise, the guideline for “normally acceptable” noise levels in residential areas is an L_{dn} of 60 dBA. This level is a guideline for the design and location of future development and a goal for the reduction of noise in existing development. However, 60 dBA L_{dn} is a guideline which cannot necessarily be reached in all residential areas within the constraints of economic or aesthetic feasibility. This guideline will be primarily applied where outdoor use is a major consideration (e.g., backyards in single-family housing developments and recreational 	LTS	LTS	LTS	LTS

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					<p>areas in multiple-family housing projects). Where the City determines that providing an L_{dn} of 60 dBA or lower outdoors is not feasible, the noise level in outdoor areas intended for recreational use should be reduced to as close to the standard as feasible through project design.</p> <ul style="list-style-type: none"> – For interior noise, the requirements of the State of California Building Standards Code (Title 24) and the Noise Insulation Standards (Title 25) are extended to all new dwelling units in Palo Alto. Specifically, interior levels for all habitable rooms must not exceed an L_{dn} of 45 dBA in all new dwelling units in Palo Alto. – Noise exposure(s) should be determined from a) more detailed noise exposure studies, or b) area-specific or project-specific noise measurements, as appropriate. Noise contour maps in this plan can be used as a preliminary screening tool in determining approximate noise exposure. – Prior to the initial development application for future developments near noise-sensitive land uses, the applicant shall submit an acoustical analysis by an acoustical engineer demonstrating projected compliance with the Comprehensive Plan, the Noise Ordinance, and the State building code. The analysis shall be based on acoustical readings, equipment specifications, architectural designs (even if preliminary), and any proposed sound reduction/insulation measures, such that the pertinent land use compatibility, interior environments, and project-related noise emissions can be demonstrated to comply with prescribed city, county, and state noise standards. 				

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TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation				Mitigation Measure	Significance After Mitigation			
	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					<ul style="list-style-type: none"> ▪ Policy: The City may require proposals to reduce noise impacts of development on adjacent properties through appropriate means including, but not limited to, the following: <ul style="list-style-type: none"> - Construct noise walls when compatible with aesthetic concerns. - Screen and control noise sources such as parking, outdoor activities, and mechanical equipment. - Increase setbacks for noise sources from adjacent dwellings. - Whenever possible, retain fences, walls, or landscaping that serve as noise buffers although design, safety, and other impacts must be addressed. - Use soundproofing materials and double-glazed windows. - Control hours of operation, including deliveries and trash pickup, to minimize noise impacts. Program: Update the Noise Ordinance to provide for clear interpretation of the regulations, and to review the appropriateness of existing standards. Strictly enforce the Noise Ordinance. 				
					<p>NOISE-1b: The following policy, or equally effective language, shall be included in the proposed Plan to ensure that aircraft noise under all four scenarios would not result in significant increases in average 24-hour noise levels.</p> <p>The following new policy shall be adopted as part of the proposed Plan. The wording of this policy may change as long as the revised policy is equally effective in</p>				

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					mitigating potential aircraft noise impacts: <ul style="list-style-type: none"> ▪ Policy: Ensure compliance with the airport related land use compatibility standards for community noise environments by prohibiting incompatible land use development within the 60 dBA CNEL noise contours of the Palo Alto airport. 				
					NOISE-1c: The following policies, or equally effective language, shall be included in the proposed Plan to ensure that railway noise under all four scenarios would not result in significant increases in average 24-hour noise levels. <ul style="list-style-type: none"> ▪ Policy: Minimize noise spillover from rail related activities into adjacent residential or noise-sensitive areas. ▪ Policy: Reduce impacts from noise and ground borne vibrations associated with rail operations by requiring that future development of habitable buildings address the following: <ul style="list-style-type: none"> – Be sited at least 100 feet from the centerline of the tracks whenever feasible. – Interior noise level of up to 45 dBA Ldn, with windows closed must be ensured through structural design. For habitable buildings located within 100 feet from the centerline of railroad tracks, developments shall provide a detailed noise impact analysis, prepared by a qualified acoustical consultant technician, demonstrating that noise and ground borne vibration issues associated with rail operations have been adequately addressed (i.e., by building siting or construction techniques). This study must demonstrate that an interior noise level of 45 dBA 				

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					Ldn will not be exceeded with windows closed. – Provide a detailed vibration impact analysis, prepared by a qualified acoustical consultant, demonstrating that ground-borne vibration levels will not exceed 72 VdB (relative to one microinch/sec) at residential buildings or 65 VdB at buildings with vibration-sensitive uses.				
NOISE-2: Implementation of the proposed Plan would not cause the L _{dn} to increase by three dB or more in an existing residential area, thereby causing the L _{dn} in the area to exceed 60 dB.	PS	PS	PS	PS	NOISE-2: Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.	LTS	LTS	LTS	LTS
NOISE-3: Implementation of the proposed Plan would have the potential to cause an increase of three dB or more in an existing residential area where the L _{dn} currently exceeds 60 dB.	PS	PS	PS	PS	NOISE-3: Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.	LTS	LTS	LTS	LTS
NOISE-4: Implementation of the proposed Plan would have the potential to result in indoor noise levels for residential development to exceed an L _{dn} of 45 dB.	S	PS	PS	PS	NOISE-4a: The following policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not result in indoor noise levels that exceed acceptable levels in residential development. <ul style="list-style-type: none"> ▪ Policy: Encourage the location of land uses in areas with compatible noise environments. Use the guidelines in the table “Land Use Compatibility for Community Noise Environment” to determine compatibility. – For exterior noise, the guideline for “normally acceptable” noise levels in residential areas is an L_{dn} of 60 dBA. This level is a guideline for the design and location of future development and a 	LTS	LTS	LTS	LTS

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					<p>goal for the reduction of noise in existing development. However, 60 dBA L_{dn} is a guideline which cannot necessarily be reached in all residential areas within the constraints of economic or aesthetic feasibility. This guideline will be primarily applied where outdoor use is a major consideration (e.g., backyards in single family housing developments and recreational areas in multiple family housing projects). Where the City determines that providing an L_{dn} of 60 dBA or lower outdoors is not feasible, the noise level in outdoor areas intended for recreational use should be reduced to as close to the standard as feasible through project design.</p> <ul style="list-style-type: none"> - For interior noise, the requirements of the State of California Building Standards Code (Title 24) and the Noise Insulation Standards (Title 25) are extended to all new dwelling units in Palo Alto. Specifically, interior levels for all habitable rooms must not exceed an L_{dn} of 45 dBA in all new dwelling units in Palo Alto. - Noise exposure(s) should be determined from (a) more detailed noise exposure studies, or (b) on area-specific or project-specific noise measurements, as appropriate. Noise contour maps in this plan can be used as a preliminary screening tool in determining approximate noise exposure. ▪ Prior to the initial development application for future developments near noise-sensitive land uses, the applicant shall submit an acoustical analysis by an acoustical engineer demonstrating projected compliance with the Comprehensive Plan, the Noise 				

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	1	2	3	4		1	2	3	4
					<p>Ordinance, and the State building code. The analysis shall be based on acoustical readings, equipment specifications, architectural designs (even if preliminary), and any proposed sound reduction/insulation measures, such that the pertinent land use compatibility, interior environments, and project-related noise emissions can be demonstrated to comply with prescribed city, county, and state noise standards.</p> <ul style="list-style-type: none"> Policy: For all future residential projects greater than four dwelling units that are proposed to be within the 65 dBA L_{dn} noise contours, as depicted on current Comprehensive Plan mapping, an acoustical analysis prepared by a qualified acoustical consultant shall be submitted to the City as part of the entitlement review application. As part of the above acoustical analysis, require that projects include appropriate layout, structural, and/or architectural design features to ensure meeting the interior noise standards of the City and State codes. 				
					<p>NOISE-4b: The Land Use Noise Compatibility Guidelines established in the current Comprehensive Plan shall be maintained under all four scenarios.</p>				
NOISE-5: Implementation of the proposed Plan would have the potential to expose persons to or generate excessive ground-borne vibration or ground-borne noise levels.	S	PS	PS	PS	<p>NOISE-5a: The following policies, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not result in significant construction-related vibration impacts.</p> <ul style="list-style-type: none"> Policy: Require a detailed construction noise impact analysis, prepared by a qualified acoustical consultant, for all projects that require discretionary approval and that are located within 100 feet of any 	LTS	LTS	LTS	LTS

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					noise sensitive land uses. If impacts are identified, require a noise monitoring plan to be prepared and submitted prior to the issuance of construction permits. This plan shall identify the monitoring locations, durations and regularity, the instrumentation to be used, and the appropriate noise control measures that will be incorporated to ensure compliance with the noise ordinance. <ul style="list-style-type: none"> Policy: Continue to prioritize construction noise limits around sensitive receptors. 				
					NOISE-5b: Implement Mitigation Measure NOISE-1c.				
NOISE-6: Implementation of the proposed Plan would have the potential to expose people to noise levels in excess of established State standards.	PS	PS	PS	PS	NOISE-6: Implement Mitigation Measures NOISE-4a and NOISE-4b.	LTS	LTS	LTS	LTS
NOISE-7: Implementation of the proposed Plan would have the potential to result in the exposure of persons to or generation of noise levels in excess of standards established in the local General Plan or noise ordinance, or applicable standards of other agencies.	PS	PS	PS	PS	NOISE-7: Implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-4a, and NOISE-4b.	LTS	LTS	LTS	LTS
NOISE-8: Implementation of the proposed Plan could result in a potentially substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	PS	PS	PS	PS	NOISE-8: The following policies, or equally effective language, shall be included in the proposed Plan to ensure that future development under all four scenarios would not result in significant impacts to sensitive receptors from construction noise and vibration. <ul style="list-style-type: none"> Policy: Require a detailed construction noise and vibration impact analysis, prepared by a qualified acoustical consultant, for all projects that require discretionary approval and that are located within 100 feet of any noise- and/or vibration-sensitive land 	LTS	LTS	LTS	LTS

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					uses. <ul style="list-style-type: none"> - If noise impacts are identified, require a noise monitoring plan to be prepared and submitted prior to the issuance of construction permits. This plan shall identify the noise monitoring locations, durations and regularity, the instrumentation to be used, and the appropriate noise control/mitigation measures that will be incorporated to ensure compliance with the noise ordinance. - If projected daytime vibration levels exceed 90 VdB (relative to one microinch/sec) at workshop uses, 84 VdB at offices uses, 78 VdB at residential uses, or the limits for VC-A through VC-E uses shown in the FTA manual, a vibration mitigation plan is to be prepared and submitted prior to the issuance of construction permits. ▪ Policy: Continue to prioritize construction noise and vibration limits around sensitive receptors. 				
NOISE-9: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would not expose people residing or working in the project area to excessive noise levels.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
NOISE-10: For a project within the vicinity of a private airstrip, the project would not expose people residing or working in the project area to excessive noise levels.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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	1	2	3	4		1	2	3	4
NOISE-11: Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, may result in significant cumulative impacts with respect to noise.	PS	PS	PS	PS	NOISE-11a: Implement Mitigation Measure NOISE-1c.	LTS	LTS	LTS	LTS
					NOISE-11b: The following programs, or equally effective language, shall be included in the proposed Plan to preclude overall community noise impacts that are in excess of established State and/or City standards. <ul style="list-style-type: none"> ▪ Program: Encourage the Joint Powers Board to pursue technologies to reduce train whistle noise in communities served by Caltrain. ▪ Program: Evaluate changing at-grade rail crossings so that they qualify as Quiet Zones based on Federal Railroad Administration (FRA) rules and guidelines in order to mitigate the effects of train horn noise without adversely affecting safety at railroad crossings. 				
					NOISE-11c: City of Palo Alto staff and officials shall participate in and contribute to the environmental impact assessment of future Caltrain and HSR development programs for railway operations within the city's SOL.				
Population and Housing									
POP-1: Implementation of the proposed Plan would have the potential to induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
POP-2: Implementation of the proposed Plan would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
POP-3: Implementation of the proposed Plan would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
POP-4: Implementation of the proposed Plan would not create a substantial imbalance between employed residents and jobs.	LTS	LTS	LTS	LTS	POP-4a: Conduct a nexus study and update the City’s affordable housing linkage fee for commercial development to ensure that new job-generating development adequately mitigates the costs of its impacts on housing affordability in Palo Alto. POP-4b: Continue to increase the supply of housing in the city through implementation of the adopted Housing Element policies and programs, and/or slow the rate of job growth in the city. Possible zoning adjustments to accomplish more housing and/or fewer jobs could include changes to allow more residential density by right in areas that are well-served by services and transit, somewhat reducing commercial FAR and replacing it with residential FAR, and/or implementing an annual limit on new office and R&D development.	LTS	LTS	LTS	LTS
POP-5: Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not substantially cumulatively exceed regional or local population projections.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
Public Services and Recreation									
PS-1: Implementation of the proposed Plan would not result in an adverse physical	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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Impact	Significance Before Mitigation				Mitigation Measure	Significance After Mitigation			
	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
impact from the construction of additional school facilities in order to maintain acceptable performance standards.									
PS-2: Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to school service.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
PS-3: Implementation of the proposed Plan would not result in an adverse physical impact from the construction of additional fire protection facilities in order to maintain acceptable performance standards.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
PS-4: Implementation of the proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to fire protection service.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
PS-5: Implementation of the proposed Project would not result an adverse physical impacts from the construction of additional police protection facilities in order to maintain acceptable service ratios.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
PS-6: Implementation of the proposed Project, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to police protection service.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
PS-7: Implementation of the proposed Plan would result in an adverse physical impact from the construction of additional parks and recreation facilities in order to maintain	S	S	S	S	PS-7: To address the potential impacts of necessary property acquisition and park construction/ improvement, the Comprehensive Plan Update and/or the Parks, Trails, Natural Open Space and Recreation	LTS	LTS	LTS	LTS

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	1	2	3	4		1	2	3	4
acceptable performance standards.					<p>Master Plan shall incorporate policies and programs addressing funding, community input, and environmental review, as follows:</p> <ul style="list-style-type: none"> ▪ Continue to collect park impact and park dedication (in lieu) fees from new development to ensure there is funding to add and improve parklands during the life of the Comprehensive Plan. Reevaluate the fees on a regular basis. ▪ Consider integrating new pocket parks within existing neighborhoods where this is possible by acquiring small parcels or conditioning new development. ▪ Where there is publicly owned land that could be improved for public use, consider designating this land as parkland when improvements occur. ▪ Pursue reliable and sustainable mechanisms to address a growing gap in maintenance funding as park and community services facilities uses increase. ▪ Monitor the health of the parks and the effectiveness of recreation facilities in the face of growing demand and use; evaluate services to respond to growing and changing demographic patterns. ▪ Monitor impacts on habitat and ecosystems and develop conservation plans to preserve and protect them. ▪ Ensure that new parks and park improvements are developed with ample community input and assessed to ensure that significant environmental impacts are avoided or mitigated to be less than significant. 				

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					<ul style="list-style-type: none"> Consider utilizing park impact and park dedication (in lieu) fees to rehabilitate, expand, or otherwise increase utilization of existing parks and recreation facilities. <p>In addition to these measures, the City would require permitting and review of new parks in accordance with CEQA, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. This EIR is a programmatic document and does not evaluate the environmental impacts of any project-specific development. With mitigation, the impact is less than significant.</p>				
PS-8: Implementation of the proposed Plan would not result in substantial cumulative adverse physical impacts associated with the provision of new or physically altered parks and recreational facilities, need for new or physically altered parks and recreation facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives.	PS	PS	PS	PS	PS-8: Implement Mitigation Measure PS-7, above.	LTS	LTS	LTSL	LTS
PS-9: Implementation of the proposed Plan would not result in an adverse physical impact from the construction of additional library facilities in order to maintain acceptable performance standards.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
PS-10: Implementation of the proposed Project, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to library services.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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	1	2	3	4		1	2	3	4
Transportation and Traffic									
TRANS-1: Implementation of the project would cause an intersection to drop below its motor vehicle level of service standard, or deteriorate operations at representative intersections that already operate at a substandard level of service.	S	S	S	S	TRANS-1a: Adopt a programmatic approach to reducing traffic with the goal of achieving no net increase in peak period motor vehicle trips from new development, with an exception for uses that directly contribute to the neighborhood character and diversity of Palo Alto (such as ground floor retail and below market rate housing). The program should, at a minimum: <ul style="list-style-type: none"> ▪ Require new development projects to prepare and implement a Transportation Demand Management (TDM) Plan to achieve the following reduction in peak period motor vehicle trips from the rates included in the Institute of Transportation Engineers' <i>Trip Generation Manual</i> for the appropriate land use category. These reductions are deemed aggressive, yet feasible, for the districts indicated. <ul style="list-style-type: none"> – 45 percent reduction in the Downtown district – 35 percent reduction in the California Avenue area – 30 percent reduction in the Stanford Research Park – 30 percent reduction in the El Camino Real Corridor – 20 percent reduction in other areas of the city TDM Plans must be approved by the City and monitored by the property owner on an annual basis. The Plans must contain enforcement mechanisms or penalties that accrue if targets are not met. ▪ Require new development projects to offset remaining peak period motor vehicle trips through 	SU	SU	SU	SU

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					one of the following methods: <ul style="list-style-type: none"> - By directly contracting with another property owner or organization to reduce trips generated from another site; or - By paying an annual fee to the City for use in reducing motor vehicle trips to the extent feasible through the provision of transit services, carpool/rideshare incentives, bicycle lanes, and other similar programs and improvements. 				
					TRANS-1b: Establish and implement a policy that eliminates (“unbundles”) free or subsidized parking in new commercial and residential development (i.e. requiring employees and residents to pay separately for parking).				
					TRANS-1c: Work to advance plans for grade separation at intersections along the Caltrain tracks to reduce traffic congestion/delay and improve safety; seek funding for design and implementation from local, regional, State, and federal sources. Ensure that future grade separation projects include a community participation and review process, and undergo environmental review. Future grade separation improvement projects would have the potential to cause environmental impacts, such as impacts associated with construction-related emissions, noise, and traffic, and aesthetics and land use impacts. These impacts, and alternatives to these grade separation projects, would be evaluated in detail when the projects are more clearly defined.				
					TRANS-1d: Take a leadership role in regional transportation planning and advocating for specific transit improvements and investments, such as Caltrain service enhancements, Dumbarton Express service,				

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					enhanced bus service on El Camino Real with queue jumping and curbside platforms, and additional VTA bus service.				
					TRANS-1e: Work with the PAUSD to ensure that decisions regarding school assignments are analyzed to reduce peak period motor vehicle trips to and from school sites.				
TRANS-2: Implementation of the project would not cause a roadway segment to drop below its level of service standard, or deteriorate operations that already operate at a substandard level of service.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
TRANS-3: Implementation of the project would cause a freeway segment or ramp to drop below its level of service standard, or deteriorate operations that already operate at a substandard level of service.	S	S	S	S	TRANS-3a: The City shall require new development projects to prepare and implement TDM programs, as described in TRANS-1a. TDM programs for worksites may include measures such as private bus services and free shuttle services to transit stations geared towards commuters.	SU	SU	SU	SU
					TRANS-3b: Take a leadership role in regional transportation planning and advocating for specific multi-modal freeway improvements, such as dynamic pricing, express bus service, transit and HOV priority, and other enhanced mobility options.				
TRANS-4: Implementation of the project would not impede the function of planned bicycle or pedestrian facilities.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
TRANS-5: Implementation of the project would not increase demand for pedestrian and bicycle facilities that cannot be met by existing or planned facilities.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
TRANS-6: Implementation of the project would impede the operation of a transit	S	S	S	S	TRANS-6: Provide traffic signal prioritization for buses at Palo Alto intersections, focusing first on regional transit	SU	SU	SU	SU

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	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
system as a result of congestion.					<p>routes. Also, provide queue jump lanes and curbside platforms for buses on El Camino Real.</p> <p>In concert with Mitigation Measure TRANS-6, Mitigation Measures TRANS-1a, TRANS-1b, and TRANS-3 would eliminate the impact on transit at the following intersections, which are projected to operate at a substandard level of service and are used by at least one bus route:</p> <ul style="list-style-type: none"> ▪ Middlefield Road and East Charleston Road (#2) under Scenarios 1 and 4 ▪ El Camino Real (SR 82) and San Antonio Road (#8) under Scenarios 1, 2, 3, and 4 ▪ Foothill Expressway and Page Mill Road (#9) under Scenarios 1, 3, and 4 ▪ Foothill Expressway and Arastradero Road (#10) under Scenarios 1, 3, and 4 ▪ Alma Street and East/West Charleston Road (#4) under Scenarios 1 and 2 <p>VTA Route 88 runs on East/West Charleston Road and crosses the Caltrain tracks and Alma Street. The intersection of Alma Street and East/West Charleston Road (#4), is one of the impacted intersections under Scenarios 1 and 2, but signal <i>pre-emption</i> for VTA's bus service would not be possible at this location, due to the railroad crossing and the need for Caltrain to have signal pre-emption capabilities. However, signal <i>priority</i> for VTA buses should be possible at this intersection, and would provide sufficient mitigation to eliminate the impact on transit at this intersection. However, impacts on transit at all intersections and segments where buses operate would not be eliminated.</p>				

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EXECUTIVE SUMMARY

TABLE 1-1 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation				Mitigation Measure	Significance After Mitigation			
	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
					No further feasible mitigation measures have been identified. Thus, all four scenarios would have a significant impact on transit operations by increasing congestion. These impacts are considered <i>significant and unavoidable</i> .				
TRANS-7: Implementation of the project would not create demand for transit services that cannot be met by current or planned services.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
TRANS-8: Implementation of the project would create the potential demand for through traffic to use local residential streets.	S	S	S	S	TRANS-8: Develop a proactive neighborhood traffic calming program with a tool box of specific improvements that can be used to discourage non-local drivers from using local, neighborhood streets to bypass traffic congestion on arterials.	LTS	LTS	LTS	LTS
TRANS-9: Implementation of the project would create an operational safety hazard.	S	S	S	S	TRANS-9: Implement Mitigation Measure TRANS-8.	LTS	LTS	LTS	LTS
TRANS-10: Implementation of the project would not result in inadequate emergency access.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
Utilities and Service Systems									
UTIL-1: Sufficient water supplies would be available to serve the proposed Plan from existing entitlements and resources and new or expanded entitlements would not be required.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-2: The proposed Plan would not result in the construction of new water facilities or expansion of existing facilities, the construction of which would cause significant environmental effects.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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Impact	Significance Before Mitigation				Mitigation Measure	Significance After Mitigation			
	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
UTIL-3: The proposed Plan would not result in the substantial physical deterioration of a water utility facility due to increased use as a result of the Plan.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-4: The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to water supply.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-5: The proposed Project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-6: The proposed Plan would not result in a determination by the wastewater treatment provider, which serves or may serve the project that it does not have adequate capacity to serve the Plan's projected demand in addition to the provider's existing commitments.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-7: The proposed Plan would not result in adverse physical impacts from new or expanded wastewater utility facilities required to provide service as a result of the Plan.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-8: The proposed Plan would not result in a substantial physical deterioration of a wastewater utility facility due to increased use as a result of the Plan.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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Impact	Significance Before Mitigation				Mitigation Measure	Significance After Mitigation			
	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
UTIL-9: The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less than significant cumulative impacts with respect to wastewater.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-10: The proposed Plan would not require or result in the construction of new stormwater facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-11: The proposed Plan would not result in adverse physical impacts from new or expanded utility facilities required to provide service as a result of the project.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-12: The proposed Plan would not result in a substantial physical deterioration of a utility facility due to increased use as a result of the project.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-13: The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to stormwater facilities.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-14: The proposed Plan would be served by landfills with sufficient permitted capacity to accommodate the proposed Plan’s solid waste disposal needs.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN

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Impact	Significance Before Mitigation				Mitigation Measure	Significance After Mitigation			
	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
UTIL-15: Without the adoption of policies to promote recycling and conservation, the proposed Plan could potentially fall out of compliance with federal, State, and local statutes and regulations related to solid waste.	LTS	PS	PS	PS	UTIL-15: The following policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that future development under Scenarios 2, 3, and 4 would comply with applicable solid waste regulations: <ul style="list-style-type: none"> Policy: Reduce the amount of solid waste disposed in the City’s landfill by reducing the amount of waste generated and promoting the cost-effective reuse of materials that would otherwise be placed in a landfill. Policy: Reduce solid waste generation through salvage and reuse of building materials, including architecturally and historically significant materials. Policy: Encourage the use of reusable, returnable, recyclable, and repairable goods through incentives, educational displays and activities, and through City purchasing policies and practices. Policy: Increase program participation to maximize recycling and composting from all residents, businesses, and institutions, and consider ways to expand recycling and composting programs. 	LTS	LTS	LTS	LTS
UTIL-16: The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to solid waste.	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN
UTIL-17: The proposed Plan would not result in a substantial increase in natural gas and electrical service demands that would require the new construction of energy supply facilities and distribution infrastructure or capacity enhancing alterations to existing facilities. However, without the adoption of	LTS	PS	PS	PS	UTIL-17: The following policies and programs, or equally effective language, shall be included in the proposed Plan to ensure that future development under Scenarios 2, 3, and 4 maximize energy efficiency and conservation: <ul style="list-style-type: none"> Policy: Optimize energy conservation and efficiency 	LTS	LTS	LTS	LTS

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Impact	Significance Before Mitigation				Mitigation Measure	Significance After Mitigation			
	SCENARIO					SCENARIO			
	1	2	3	4		1	2	3	4
policies in support of energy efficiency and conservation, the proposed Plan would result in a potentially significant impact, requiring mitigation.					in new and existing residences, businesses, and industries in Palo Alto. <ul style="list-style-type: none"> ▪ Policy: Maintain Palo Alto’s long-term supply of electricity and natural gas while transitioning to renewable energy and energy conservation. ▪ Program: Encourage establishment of public education programs addressing energy conservation and efficiency. ▪ Program: Incorporate cost-effective energy conservation measures into construction, maintenance, and City operation and procurement practices. ▪ Program: Incorporate State and federal energy efficiency and renewable energy standards and policies in relevant City codes, regulations, and procedures for both privately-owned and City-owned projects and properties. ▪ Program: Evaluate the merits of electrification strategies and implement suitable programs to switch from gasoline/natural gas to electricity to achieve deep carbon emission reduction. 				

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