

5. Significant Unavoidable Adverse Impacts

Section 15126.2 of the California Environmental Quality Act (CEQA) Guidelines requires that “direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short- and long-term effects.” Cumulative impacts must also be considered.

This EIR assesses a “project” that consists of an updated Comprehensive Plan (proposed Plan), including updated policies and implementation programs that will necessitate regulatory (zoning) changes and transportation investments. To test the possible impacts of the Plan, which has not yet been finalized, the Draft EIR considers four simplified planning scenarios with different amounts of growth and different transportation investments.

Chapter 1, Executive Summary, contains Table 1-1, which summarizes the impacts, mitigation measures, and levels of significance before and after mitigation associated with each planning scenario. While mitigation measures identified in this Draft EIR are expected to be incorporated into the proposed Plan that is ultimately adopted where this is feasible and these measures would reduce the level of impact to less than significant in many cases, the following impacts would remain significant and unavoidable after identified mitigation measures are applied:

Aesthetics and Visual Resources

None.

Air Quality

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). (Significant and Unavoidable – All Four Scenarios)
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Impacts associated with both construction and operational emissions would be significant. Mitigation measures would require adherence to the current BAAQMD basic control measures and implementation of BAAQMD-approved mitigation measures, ensure impacts from fugitive dust generated during construction

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activities are less than significant. However, an analysis of emissions generated from the construction of specific future projects under the proposed Plan would be required to evaluate emissions compared to BAAQMD's project-level significance thresholds during individual environmental review. Due to the programmatic nature of the proposed Plan, no additional mitigation measures are available and the impact is considered *significant and unavoidable*.

Biological Resources

None.

Cultural Resources

None.

Geology, Soils, and Seismicity

None.

Greenhouse Gas Emissions and Climate Change

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. (Significant and Unavoidable – All Four Scenarios)

The inclusion of GHG reduction policies and programs in the proposed Plan would reduce impacts to the extent feasible. The City is also preparing a *Sustainability and Climate Action Plan (S/CAP)* in conjunction with the proposed Plan to 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. Therefore, the impact is *significant and unavoidable*.

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. (Significant and Unavoidable – All Four Scenarios)

The inclusion of policies and programs in the proposed Plan to reduce impacts associated with the physical effects of climate change would reduce the impact to the extent feasible. However, City actions alone cannot

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halt the onset of climate change and its effects, or ensure that future development would not expose people and structures to the hazards associated with climate change in Palo Alto. Therefore, the impact is *significant and unavoidable*.

Hazards and Hazardous Materials

None.

Hydrology and Water Quality

None.

Land Use and Planning

None.

Noise

None.

Population and Housing

None.

Public Services and Recreation

None.

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. (Significant and Unavoidable – All Four Scenarios)
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The proposed Plan would result in significant impacts at the following intersections:

- I-280 NB Ramps and Sand Hill Road (#1) (in Menlo Park)
- Middlefield Road and East Charleston Road (#2)
- Alma Street and East/West Charleston Road (#4)
- El Camino Real (State Route 82) and San Antonio Road (#8) (in Mountain View)
- Foothill Expressway and Page Mill Road (#9)

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- Foothill Expressway and Arastradero Road (#10)

Mitigation measures would include additional Transportation Demand Management (TDM) measures, a “no net new trips” policy for new office and research and development (R&D) projects, support for expanded public transit, and an updated Citywide Traffic Impact Fee. For the Middlefield Road/Charleston Road intersection, these mitigation measures would be sufficient to reduce the impact to a less-than-significant level. However, for the remaining intersections, all of the scenarios would still generate additional vehicle trips such that intersections would be significantly affected. The affected intersections are operating close to or below level of service standards under existing conditions, so even small increases in traffic at these intersections would trigger impacts. Therefore, the impact would be *significant and unavoidable*.

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. (Significant and Unavoidable – All Four Scenarios)
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All four scenarios would have a significant impact on the following freeway segments:

- Northbound US 101, between Rengstorff Avenue and San Antonio Road, both AM and PM peak hours
- Northbound US 101, between San Antonio Road and Oregon Expressway, AM peak hour
- Northbound US 101, between Embarcadero Road and University Avenue, PM peak hour
- Southbound US 101, between Oregon Expressway and San Antonio Road, PM peak hour
- Southbound US 101, between San Antonio Road and Rengstorff Avenue, PM peak hour
- Northbound I-280, between Sand Hill Road and Woodside Road (SR 84), PM peak hour
- Southbound I-280, between Woodside Road (SR 84) and Sand Hill Road, PM peak hour

Mitigation would include the City taking 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. Mitigations will also include TDM measures such as private bus services and free shuttle services to transit stations geared towards commuters. This mitigation would reduce impacts at the following segments to less-than-significant levels:

- Southbound US 101, between Oregon Expressway and San Antonio Road, PM peak hour
- Southbound US 101, between San Antonio Road and Rengstorff Avenue, PM peak hour
- Northbound I-280, between Sand Hill Road and Woodside Road (SR 84), PM peak hour

However, on the remaining segments, the trip reduction needed to avoid an impact is greater than 40 percent and therefore the additional TDM mitigation measure would reduce but not eliminate the impact. Therefore, the impact would be *significant and unavoidable*.

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TRANS-6 Implementation of the project would impede the operation of a transit system as a result of congestion. (Significant and Unavoidable – All Four Scenarios)

All four scenarios would cause some degradation in level of service on at least one roadway segment and have a significant impact on multiple intersections. Transit services that travel on those roadway segments and use those impacted intersections would be slowed down by the increased congestion. Mitigation measure 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:

- Middlefield Road and East Charleston Road (#2) under Scenarios 1 and 4
- El Camino Real 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

However, impacts at all intersections and segments where buses operate would not be eliminated. 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 *pre-emption* 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 *priority* for VTA buses should be possible at this intersection and would provide sufficient mitigation to eliminate the impact on transit at this intersection. No further feasible mitigation measures have been identified. Thus, all four scenarios would have a significant impact on transit operations by increasing congestion and this impact is considered *significant and unavoidable*.

Utilities and Service Systems

None.

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