

# 1. Executive Summary

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This chapter presents an overview of this Supplement to the 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 Supplement to the Draft EIR.

This Supplement to the 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. A Draft EIR was published on February 5, 2016 for a 90-day comment period that was subsequently extended to 124 days (ending June 8, 2016). The Draft EIR, herein referred to as the “February 2016 Draft EIR,” assesses four alternatives or “scenarios” at an equal level of detail. In early 2016, the City Council directed City staff to analyze additional scenarios to broaden the range of potential outcomes and provide additional information to inform the planning process. This Supplement to the Draft EIR has been prepared to assess the two additional scenarios, called Scenarios 5 and 6.

This Supplement to the Draft EIR will be available for review by the public and interested parties, agencies, and organizations for a 49-day comment period starting February 10, 2017 and ending March 31, 2017. During the public review period, both the Planning & Transportation Commission and the City Council will hold public meetings for members of the public to offer comments on the Draft EIR. The public meetings are tentatively scheduled for March 29, 2017 at 6:00 p.m. (Planning & Transportation Commission) and March 20, 2017 at 7:00 p.m. (City Council). Both meetings will occur in the Council Chambers, 1<sup>st</sup> Floor City Hall, 250 Hamilton Avenue and all persons may appear and be heard at these meetings.

During the comment period, the public is invited to submit written comments via mail or e-mail on the Supplement to the Draft EIR to the City of Palo Alto Planning and Community Environment Department. Members of the public are also invited to submit additional comments on the February 2016 Draft EIR, which is available online at <http://www.paloaltocomplan.org/eir/>.

Written comments should be submitted to:

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## EXECUTIVE SUMMARY

### 1.1 SUPPLEMENT TO THE DRAFT EIR

This Supplement to the Draft EIR is a recirculated EIR prepared in accordance with CEQA Guidelines Section 15088.5, which contains provisions regarding recirculation of an EIR. According to Section 15088.5(a), a lead agency is required to recirculate an EIR when “significant new information” is added to the EIR after notice of availability of the Draft EIR has been issued but before certification of the EIR. According to CEQA Guideline Section 15088.5(a), “information” can include changes in the project, changes in the environmental setting, additional data, or other information. In this case, the new information that has been added to the February 2016 Draft EIR is the addition of Scenarios 5 and 6 to the Project Description.

According to Section 15088.5(c), the recirculated EIR need only contain the portions of the Draft EIR that have been modified. Therefore, this Supplement to the Draft EIR focuses on new analysis pertaining to Scenarios 5 and 6 and does not reproduce information from the February 2016 Draft EIR unless it is critical to understanding this analysis. This Supplement to the Draft EIR also presents information from the February 2016 Draft EIR where the information has been revised.

### 1.2 REPORT ORGANIZATION

This Supplement to the Draft EIR is organized into the following chapters:

- **Chapter 1: 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 2: Introduction.** Provides an overview describing the Draft EIR document.
- **Chapter 3: Project Description.** Describes Scenarios 5 and 6. The final Plan that is considered for adoption is expected to fall within the range of options described by the six 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 an analysis of the potential environmental impacts of Scenarios 5 and 6, and recommended mitigation measures, if required, to reduce their significance. Where changes to the environmental setting information or mitigation measures of the February 2016 Draft EIR have been made, they are shown in ~~strickthrough~~ and underline.
- **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 six planning scenarios represent a

## EXECUTIVE SUMMARY

reasonable range of options that address significant impacts of the proposed Plan to the extent feasible, and describes a potential hybrid.

- **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 Supplement to the Draft EIR.
- **Appendices:** The appendices for this Supplement to the Draft EIR (presented in PDF format on a CD attached to the back cover) contain the following supporting documents:
  - Appendix C: Air Quality and Greenhouse Gas Emissions Modeling. This appendix was published as part of the February 2016 Draft EIR and has been updated to include data for Scenarios 5 and 6.
  - Appendix G: Transportation Impact Analysis. This appendix was published as part of the February 2016 Draft EIR and has been updated to include data for Scenarios 5 and 6.
  - Appendix H: Memorandum re: Analysis of the No Growth Scenario. This appendix was not included in the February 2016 Draft EIR.
  - Appendix I: Supplemental Noise Appendix. This appendix includes noise data for Scenarios 5 and 6 to supplement the data for Scenarios 1 through 4 in Appendix F that was published in the February 2016 Draft EIR.

### 1.3 “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.*

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.

## EXECUTIVE SUMMARY

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.

### 1.4 SUMMARY OF THE PROPOSED PLAN

This Supplement to the Draft EIR analyzes two planning scenarios that were not included in the February 2016 Draft EIR and are meant to inform the policy choices inherent in the planning process and test new approaches to addressing the key issues of growth, transportation, housing, and sustainability. Brief descriptions of all six 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 City’s past performance (a long term average of about 145 new dwelling units per year), and ABAG’s 2013 projection of job growth.
- **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

## EXECUTIVE SUMMARY

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.
- **Scenario Five.** This scenario would lower job growth below current projections and allow a modest increase in housing in an effort to improve the city’s jobs-to-employed-residents ratio. Scenario 5 would test strategies designed to slow the pace of job growth and would replace or supplement the current citywide “cap” on new non-residential square footage in “monitored areas” with a permanent annual limit on office and R&D development. This scenario would include the same number of housing units as Scenario 3 but would include fewer jobs than Scenarios 1 through 4.
- **Scenario Six.** This scenario would also lower job growth below current projections and would allow a robust increase in housing in an effort to address issues of housing affordability and supply in the city and improve the city’s jobs-to-employed-residents ratio. Scenario 6 would test strategies designed to slow the pace of job growth and would include more housing units than any of the other scenarios, and more than is projected by regional organizations such as the Association of Bay Area Governments (ABAG).

The baseline data and housing and employment projected for Scenarios 5 and 6 were developed using the same methodology described in the February 2016 Draft EIR. Horizon-year housing and employment projections for all of the planning scenarios are provided in Tables 1-1 and 1-2, which show net new growth between 2014 and 2030 in the city and the city plus Sphere of Influence (SOI), respectively.

## 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 1-3, some significant impacts would be reduced to a less-than-significant level if the

## EXECUTIVE SUMMARY

**TABLE 1-1 SUMMARY OF 2030 HOUSING AND EMPLOYMENT PROJECTIONS IN THE CITY**

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
New Housing Units	2,720	2,720	3,545	4,420	3,545	6,000
New Population <sup>a</sup>	6,600	6,600	8,435	10,455	8,435	14,080
New Employees	15,480	9,850	12,755	15,480	8,865	8,865
New Employment Workspace (Square Feet) <sup>b</sup>	3,300,000	3,000,000	3,500,000	4,000,000	2,400,000	2,400,000

a. Population is calculated based on a housing unit vacancy rate of five percent. Population is also based on an average household size of 2.40 persons per household in 2014 and 2.41 persons per household in 2030 with the city limit, and an average household size of 2.0 in 2014 and 2030 within the SOI.

b. Estimates of new employment workspace were developed primarily for use in the Fiscal Analysis of the City of Palo Alto 2030 Comprehensive Plan, which covers only the city limit. Therefore, these numbers were not developed for the City limits + SOI and are not included in Table 3-5, below. Note that all square footages here include 1.3M square feet that has already been approved at the Stanford University Medical Center.

Source: PlaceWorks, City of Palo Alto, 2016.

**TABLE 1-2 SUMMARY OF 2030 HOUSING AND EMPLOYMENT PROJECTIONS IN THE CITY AND SOI**

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
New Housing Units	3,880	3,880	4,710	5,580	4,710	7,165
New Population <sup>a</sup>	9,405	9,405	11,240	13,260	11,240	16,885
New Employees	15,870	10,240	13,145	15,870	9,255	9,255

a. Population is calculated based on a housing unit vacancy rate of five percent. Population is also based on an average household size of 2.40 persons per household in 2014 and 2.41 persons per household in 2030 with the city limit, and an average household size of 2.0 in 2014 and 2030 within the SOI.

Source: PlaceWorks, City of Palo Alto, 2016.

mitigation measures identified in this Supplement to the 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 1-3, 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 Supplement to the 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 Supplement to the Draft EIR.

Table 1-3 summarizes the conclusions of the environmental analysis contained in this Supplement to the 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 6. For a complete description of potential impacts, please refer to the specific discussions in Chapters 4.1 through 4.14.

## EXECUTIVE SUMMARY

In some places, Table 1-3 incorporates changes to the mitigation measures of the February 2016 Draft EIR. Mitigation measures appear in their revised, “clean” format in Table 1-3 but are shown in ~~strike through~~ and underline in Chapters 4.1 through 4.14.

## EXECUTIVE SUMMARY

TABLE 1-3 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation						Mitigation Measure	Significance After Mitigation					
	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
<b>Aesthetics and Visual Resources</b>													
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	PS	PS	AES-1: To ensure that increased residential densities would not degrade the visual character or quality of the area, the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>High-quality building and site design.</li> <li>Compatibility with surrounding development and public spaces.</li> <li>Enhancement of existing commercial centers.</li> <li>Requirements for landscaping and street trees.</li> <li>Preservation and creation of a safe and inviting pedestrian environment.</li> </ul> Appropriate building form, massing, and setbacks.	LTS	LTS	LTS	LTS	LTS	LTS
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	S	S	AES-4: The City shall amend its local CEQA guidelines to require development projects of a certain size or location to prepare an analysis of potential shade/shadow impacts. The analysis 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. The analysis shall identify whether the project would shadow open spaces during these times, explain how the project meets City design requirements and other City policy goals, and describe ways to mitigate substantial	LTS	LTS	LTS	LTS	LTS	LTS

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**EXECUTIVE SUMMARY**

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Impact	Significance Before Mitigation						Mitigation Measure	Significance After Mitigation						
	SCENARIO							SCENARIO						
	1	2	3	4	5	6		1	2	3	4	5	6	
AES-5: Implementation of the proposed Plan would not contribute to cumulative aesthetics impacts in the area.	LTS	LTS	LTS	LTS	LTS	LTS	shade and shadow impacts through feasible building and site design features. No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	NMN
<b>Air Quality</b>														
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	PS	PS	AIR-1: To ensure consistency with the <i>2010 Bay Area Clean Air Plan</i> , the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>Reduction in emissions of particulates from automobiles, manufacturing, construction activity, and other sources (e.g. dry cleaning, wood burning, landscape maintenance).</li> <li>Support for regional, State, and federal programs that improve air quality.</li> <li>Support for transit, bicycling, and walking.</li> <li>Mix of uses (e.g. housing near employment centers) and development types (e.g. infill) to reduce the need to drive.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS	
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	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 <sub>10</sub> (Table 8-1, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the BAAQMD CEQA Guidelines).	SU	SU	SU	SU	SU	SU	SU
							AIR-2b: Prior to issuance of construction permits, development project applicants that are subject to CEQA							

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## EXECUTIVE SUMMARY

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
							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 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.						
							AIR-2c: To ensure that development projects that have the potential to exceed the BAAQMD screening criteria air pollutants listed in the BAAQMD CEQA Guidelines reduce regional air pollutant emissions below the BAAQMD thresholds of significance, the proposed Plan shall include policies that address the following topic: <ul style="list-style-type: none"> <li>Require compliance with BAAQMD requirements, including BAAQMD CEQA Guidelines.</li> </ul>						
							AIR-2d: Implement Mitigation Measure TRANS-1a. In addition, to reduce long-term air quality impacts by						

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**EXECUTIVE SUMMARY**

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	1	2	3	4	5	6		1	2	3	4	5	6
AIR-3: Implementation of the proposed Plan would expose sensitive receptors to substantial concentrations of air pollution.	PS	PS	PS	PS	S	S	<p>emphasizing walkable neighborhoods and supporting alternative modes of transportation, the proposed Plan shall include policies that address the following topic:</p> <ul style="list-style-type: none"> <li>Enhanced pedestrian and bicycle connections between commercial and mixed-use centers.</li> </ul> <p>AIR-3a: The City of Palo Alto shall updates its CEQA Procedures to require that future non-residential projects 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 incremental cancer risk exceeds the BAAQMD significance thresholds, 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"> <li>Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible.</li> <li>Electrifying warehousing docks.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS

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**EXECUTIVE SUMMARY**

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
							<ul style="list-style-type: none"> <li>Requiring use of newer equipment and/or vehicles.</li> <li>Restricting off-site truck travel through the creation of truck routes.</li> </ul> <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: To ensure that new industrial and warehousing projects with the potential to generate new stationary and mobile sources of air toxics that exceed the BAAQMD project-level and/or cumulative significance thresholds for toxic air contaminants and PM<sub>2.5</sub> listed in the BAAQMD CEQA Guidelines reduce emissions below the BAAQMD thresholds of significance, the proposed Plan shall include policies that address the following topic:</p> <ul style="list-style-type: none"> <li>Require compliance with BAAQMD requirements, including BAAQMD CEQA Guidelines.</li> </ul>						
							<p>AIR-3c: The City of Palo Alto shall update its CEQA Procedures to require that residential and other sensitive land use projects (e.g., hospitals, nursing homes, and day care centers) that are subject to CEQA and are not classified as exempt 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 the BAAQMD.</p> <p>The HRA shall be prepared in accordance with policies and procedures of the State Office of Environmental Health</p>						

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**EXECUTIVE SUMMARY**

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
							<p>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 exceeds BAAQMD significance thresholds, 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"> <li>▪ Air intakes located away from high volume roadways and/or truck loading zones.</li> <li>▪ Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized Maximum Efficiency Rating Value (MERV) filters.</li> </ul> <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.</p> <p>AIR-3d: Amend the Palo Alto Municipal Code to require applicants for new ministerial projects, or new discretionary projects that are exempt from 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, to either submit an</p>						

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## EXECUTIVE SUMMARY

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	1	2	3	4	5	6		1	2	3	4	5	6
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	S	S	HRA showing that BAAQMD significance thresholds would not be exceeded, or provide a filtration system capable of filtering out 90 percent of fine inhalable particulates and diesel particulate matter.  AIR-4: To reduce odor impacts, the proposed Plan shall include policies to address the following topic: <ul style="list-style-type: none"> <li>▪ Buffers and other mitigation methods to avoid human health impacts from sources of odor and/or toxic air contaminants.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS
<b>Biological Resources</b>													
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN

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**EXECUTIVE SUMMARY**

**TABLE 1-3 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation						Mitigation Measure	Significance After Mitigation					
	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
<b>Cultural Resources</b>													
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	S	S	CULT-1: To ensure the protection of historic resources listed on the National and/or California Register or the City's Historic Resource Inventory, the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>▪ The effectiveness of the Historic Preservation Ordinance in preserving historic resources.</li> <li>▪ Periodic updates to and maintenance of the City's Historic Resource Inventory.</li> <li>▪ Process for including potential historic resources in the City's Historic Resources Inventory.</li> <li>▪ Protection of archaeological resources.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS
CULT-2: Implementation of the proposed Plan could eliminate important examples of major periods of California history or prehistory.	S	S	S	S	S	S	CULT-2: Implement Mitigation Measure CULT-1.	LTS	LTS	LTS	LTS	LTS	LTS

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	1	2	3	4	5	6		1	2	3	4	5	6
CULT-3: Implementation of the proposed Plan could cause damage to an important archaeological resource as defined in Section 15064.5 of the CEQA Guidelines.	S	PS	PS	PS	PS	PS	CULT-3: Implement Mitigation Measure CULT-1. In addition, to ensure that future development would not damage archaeological resources, the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>▪ Archaeological surveys and mitigation plans for future development projects.</li> <li>▪ Developer compliance with applicable regulations regarding the identification and protection of archaeological and paleontological deposits.</li> <li>▪ Adequate tribal consultation and consideration of tribal concerns.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS
CULT-4: Implementation of the proposed Plan would not cause a significant impact due to disturbance of any human remains, including those interred outside of formal cemeteries.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	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	PS	PS	CULT-5: Implement Mitigation Measure CULT-3.	LTS	LTS	LTS	LTS	LTS	LTS
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	S	S	CULT-6: Implement Mitigation Measure CULT-1.	LTS	LTS	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	S	S	CULT-7: Implement Mitigation Measures CULT-1 and CULT-3.	LTS	LTS	LTS	LTS	LTS	LTS

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
<b>Geology, Soils, and Seismicity</b>													
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
GEO-4: Implementation of the proposed Plan would not cause substantial erosion or siltation.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
<b>Greenhouse Gas Emissions and Climate Change</b>													
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
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.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
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	S	S	GHG-3: To address the potential impacts associated with exposing people to the effects of climate change, the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>▪ Flooding risks caused by climate change-related changes to precipitation patterns, groundwater levels, sea level rise, tides, and storm surges.</li> <li>▪ Cooperative planning with federal, State, regional, and local public agencies on issues related to climate change (including sea level rise and extreme storms).</li> <li>▪ Preparation of response strategies to address sea level rise, increased flooding, landslides, soil erosion, storm events, and other events related to climate change.</li> <li>▪ Impacts of sea level rise on Palo Alto’s levee system.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS
<b>Hazards and Hazardous Materials</b>													
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	NI	NI	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
<b>Hydrology and Water Quality</b>													
HYD-1: The proposed Plan would not violate any water quality standards or waste discharge requirements.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	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	PS	PS	HYD-2: To reduce potential impacts associated with construction dewatering the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>▪ Impacts of basement construction for single-family homes on adjacent properties, public resources, and the natural environment.</li> <li>▪ Conservation of subsurface water resources.</li> <li>▪ Reduced residential basement dewatering and other excavation activities.</li> <li>▪ Construction techniques and recharge strategies to reduce subsurface and surface water impacts.</li> <li>▪ Monitoring of dewatering and excavation projects.</li> <li>▪ Cooperation with other jurisdictions and regional agencies to protect groundwater.</li> <li>▪ Protection of groundwater from the adverse impacts of urban uses.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS
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 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.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
HYD-4: The proposed Plan would not result in stream bank instability.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
HYD-9: The proposed Plan would not be impacted by inundation by seiche, tsunami, or mudflow.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
<b>Land Use and Planning</b>													
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	PS	PS	LAND-1: To ensure that the intensity of future development would not adversely change the land use patterns or affect the livability of Palo Alto neighborhoods, the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>▪ Strengthening of residential neighborhoods.</li> <li>▪ Vitality of commercial areas and public facilities.</li> <li>▪ High-quality building and site design.</li> <li>▪ Architectural compatibility of new development.</li> <li>▪ Promotion of appropriate infill development.</li> <li>▪ Gradual transitions in the scale of development where residential districts abut more intense uses.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS
LAND-2: The proposed Plan would allow development that could be incompatible with adjacent land uses or with the general character of the surrounding area, including density and building height.	LTS	LTS	PS	PS	PS	PS	LAND-2: Implement Mitigation Measure LAND-1. In addition, to further reduce potential impacts to visual character and ensure compatibility with adjacent land uses, the proposed Plan shall include policies that address the following topic: <ul style="list-style-type: none"> <li>▪ Architectural standards that address land use transitions.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS
LAND-3: The proposed Plan would not allow development that could conflict with established residential, recreational, educational, religious, or scientific uses of an area.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
LAND-5: The proposed Plan could physically divide an established community.	PS	PS	PS	PS	PS	PS	LAND-5: To avoid potential impacts from physically dividing an established community, the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>▪ Enhanced connections to and from parks, schools, and community facilities for all users.</li> <li>▪ Safe and convenient pedestrian, bicycle, and transit connections between residential areas and commercial centers.</li> <li>▪ Cooperation with other agencies to improve circulation connections.</li> <li>▪ Grade separation of rail crossings.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS
LAND-6: The proposed Plan would not conflict with an applicable habitat conservation plan or natural community plan.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
<b>Noise</b>													
NOISE-1: Implementation of the proposed Plan would have the potential to cause the average 24-hour noise level (L <sub>dn</sub> ) to increase by 5.0 decibels (dB) or more in an existing residential area, even if the L <sub>dn</sub> would remain below 60 dB.	LTS	PS	PS	PS	PS	PS	NOISE-1a: To ensure that average 24-hour noise levels associated with long-term operational noise would not increase by 5.0 decibels (dB) or more in an existing residential area, the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>▪ Location of land uses in areas with compatible noise environments.</li> <li>▪ Use of the guidelines in the “Land Use Compatibility for Community Noise Environment” table to evaluate the compatibility of proposed land uses with existing noise environments.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS

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	1	2	3	4	5	6		1	2	3	4	5	6
							<ul style="list-style-type: none"> <li>▪ Clear guidelines for maximum outdoor noise levels in residential areas.</li> <li>▪ Adherence to the interior noise requirements of the State of California Building Standards Code (Title 24) and the Noise Insulation Standards (Title 25).</li> <li>▪ Inclusion of a noise contour map in the proposed Plan.</li> <li>▪ Reduction of noise impacts of development on adjacent properties.</li> <li>▪ Updating for clarity the Noise Ordinance to make enforcement easier.</li> </ul>						
							<p>NOISE-1b: To ensure that aircraft noise would not increase average 24-hour noise levels by 5.0 decibels (dB) or more in an existing residential area, the proposed Plan shall include policies that address the following topics:</p> <ul style="list-style-type: none"> <li>▪ Compliance with the airport-related land use compatibility standards for community noise environments.</li> <li>▪ Prohibition of incompatible land use development within the 60 dBA CNEL noise contours of the Palo Alto airport, as established in the adopted County of Santa Clara Airport Land Use Commission Comprehensive Land Use Plan (CLUP) for the Palo Alto Airport.</li> </ul>						
							<p>NOISE-1c: To ensure that railway noise would not increase average 24-hour noise levels by 5.0 decibels (dB) or more in an existing residential area, the proposed Plan shall include policies that address the following topics:</p> <ul style="list-style-type: none"> <li>▪ Noise spillover from rail-related activities into adjacent noise-sensitive areas.</li> <li>▪ Reduction of impacts from noise and ground borne vibrations associated with rail operations.</li> <li>▪ Guidelines for interior noise levels.</li> </ul>						

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
							<ul style="list-style-type: none"> <li>Requirements for vibration impact analysis for future development projects.</li> </ul>						
NOISE-2: Implementation of the proposed Plan would not cause the L <sub>dn</sub> to increase by 3 dB or more in an existing residential area, thereby causing the L <sub>dn</sub> in the area to exceed 60 dB.	PS	PS	PS	PS	PS	PS	NOISE-2: Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.	LTS	LTS	LTS	LTS	LTS	LTS
NOISE-3: Implementation of the proposed Plan would have the potential to cause an increase of 3 dB or more in an existing residential area where the L <sub>dn</sub> currently exceeds 60 dB.	PS	PS	PS	PS	PS	PS	NOISE-3: Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.	LTS	LTS	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 <sub>dn</sub> of 45 dB.	S	PS	PS	PS	PS	PS	NOISE-4a: Implement Mitigation Measure NOISE-1a.	LTS	LTS	LTS	LTS	LTS	LTS
							NOISE-4b: The Land Use Noise Compatibility Guidelines established in the current Comprehensive Plan shall be maintained under all six scenarios.						
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	PS	PS	NOISE-5a: To ensure that future development would not result in significant construction-related vibration impacts, the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>Requirements for construction and operations vibration impact analyses, to be prepared by a qualified acoustical consultant for development projects.</li> <li>Requirements for vibration mitigation plans to ensure compliance with the pertinent industry standards and City guidelines for projects that would experience vibration impacts during construction or operations.</li> <li>Limits for construction and operations vibration around vibration-sensitive receptors.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS
							NOISE-5b: Implement Mitigation Measure NOISE-1c.						

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	1	2	3	4	5	6		1	2	3	4	5	6
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	PS	PS	NOISE-6: Implement Mitigation Measures NOISE-4a and NOISE-4b.	LTS	LTS	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	PS	PS	NOISE-7: Implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-4a, and NOISE-4b.	LTS	LTS	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	PS	PS	NOISE-8: To ensure that future development would not result in significant impacts to sensitive receptors from construction noise, the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>Construction noise limits around sensitive receptors.</li> <li>Monitoring and reporting plans for construction noise levels of larger development projects.</li> <li>Noise control measures to ensure compliance with the noise ordinance.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN

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**EXECUTIVE SUMMARY**

**TABLE 1-3 SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact	Significance Before Mitigation						Mitigation Measure	Significance After Mitigation					
	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
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	PS	PS	NOISE-11a: Implement Mitigation Measure NOISE-1c.	LTS	LTS	LTS	LTS	LTS	LTS
							NOISE-11b: To preclude overall community noise impacts that are in excess of established State and/or City standards, the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>▪ Technological methods to reduce train whistle noise from Caltrain.</li> <li>▪ Evaluation of at-grade rail crossings as potential Quiet Zones based on Federal Railroad Administration (FRA) rules and guidelines.</li> <li>▪ Grade separation of rail crossings as a City priority.</li> </ul>						
							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 SOI.						
<b>Population and Housing</b>													
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN

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	1	2	3	4	5	6		1	2	3	4	5	6
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
<b>Public Services and Recreation</b>													
PS-1: Implementation of the proposed Plan would not result in an adverse physical impact from the construction of additional school facilities in order to maintain acceptable performance standards.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
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 facilities.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
PS-5: Implementation of the proposed Project would not result in adverse physical impacts from the construction of additional police protection facilities in order to maintain acceptable service ratios.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	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 acceptable performance standards.	S	S	S	S	S	S	PS-7: To address the potential physical impacts of park construction/improvement, the Comprehensive Plan Update and/or the Parks, Trails, Natural Open Space and Recreation Master Plan shall incorporate policies addressing the following topic: <ul style="list-style-type: none"> <li>▪ Evaluation and mitigation of the construction impacts associated with park and recreational facility creation and expansion.</li> </ul>	LTS	LTS	LTS	LTS	LTS	LTS
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	PS	PS-8: Implement Mitigation Measure PS-7.	LTS	LTS	LTS	LTS	LTS	LTS

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	1	2	3	4	5	6		1	2	3	4	5	6
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
<b>Transportation and Traffic</b>													
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	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"> <li>▪ 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"> <li>– 45 percent reduction in the Downtown district</li> <li>– 35 percent reduction in the California Avenue area</li> <li>– 30 percent reduction in the Stanford Research Park</li> <li>– 30 percent reduction in the El Camino Real Corridor</li> <li>– 20 percent reduction in other areas of the city</li> </ul> </li> </ul> TDM Plans must be approved by the City and	SU	SU	SU	SU	SU	SU

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	SCENARIO							SCENARIO					
	1	2	3	4	5	6		1	2	3	4	5	6
							monitored by the property owner on an annual basis. The Plans must contain enforcement mechanisms or penalties that accrue if targets are not met. <ul style="list-style-type: none"> <li>Require new development projects to pay a Transportation Impact Fee which will be partially used to reduce peak period motor vehicle trips citywide.</li> </ul>						
							TRANS-1b: Study the feasibility of unbundled parking for office, commercial and multi-family residential development (including senior housing developments) that are well-served by transit and demonstrated walking and biking connections, including senior housing developments.						
							TRANS-1c: Include policies in the Comprehensive Plan to ensure collaboration with regional agencies and neighboring jurisdictions, and identification and pursuit of funding for rail corridor improvements and grade separation. Policies shall support grade separation of rail crossings along the rail corridor as a City priority, and encourage studies and outreach necessary to advance grade separation of Caltrain to become a “shovel ready” project.						
							TRANS-1d: Engage in regional transportation planning and advocate for specific transit improvements and investments, such as Caltrain service enhancements and grade separations, Dumbarton Express service, enhanced bus service on El Camino Real with queue jumping and curbside platforms, and additional VTA bus service.						
							TRANS-1e: Encourage the PAUSD to analyze decisions regarding school assignments 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	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN

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	SCENARIO							SCENARIO								
	1	2	3	4	5	6		1	2	3	4	5	6			
operations that already operate at a substandard level of service.																
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	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	SU	SU	SU	SU	
							TRANS-3b: Include policies in the Comprehensive Plan that advocate for efforts by Caltrans and the Valley Transportation Authority to reduce congestion and improve traffic flow on existing freeway facilities consistent with Statewide GHG emissions reduction initiatives.  Policies shall support the application of emerging freeway information, monitoring, and control systems that provide non-intrusive driver assistance and reduce congestion.  Policies shall support, where appropriate, the conversion of existing traffic lanes to exclusive bus and high-occupancy vehicle (HOV) lanes on freeways and expressways, including the Dumbarton Bridge, and the continuation of an HOV lane from Redwood City to San Francisco.									
TRANS-4: Implementation of the project would not impede the function of planned bicycle or pedestrian facilities.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	NMN	NMN	
TRANS-6: Implementation of the project would impede the operation of a transit system as a	S	S	S	S	S	S	TRANS-6: Include policies in the Comprehensive Plan that address transit access and give priority to buses and to	SU	SU	SU	SU	SU	SU	SU	SU	

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	1	2	3	4	5	6		1	2	3	4	5	6		
result of congestion.							transit facilities. Examples include queue jump lanes, signal priority for buses, and bulb-outs at bus stops. Also, advocate for bus service improvements on El Camino Real such as queue jump lanes and curbside platforms.								
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	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	S	S	TRANS-8: Include policies in the Comprehensive Plan to identify 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	LTS	LTS	LTS	LTS
TRANS-9: Implementation of the project would create an operational safety hazard.	S	S	S	S	S	S	TRANS-9: Implement Mitigation Measure TRANS-8.	LTS	LTS	LTS	LTS	LTS	LTS	LTS	LTS
TRANS-10: Implementation of the project would not result in inadequate emergency access.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	LTS	LTS	LTS	LTS
<b>Utilities and Service Systems</b>															
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	NMN	NMN
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	NMN	NMN
UTIL-4: The proposed Plan, in combination with past, present, and reasonably foreseeable	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	NMN	NMN

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	SCENARIO							SCENARIO									
	1	2	3	4	5	6		1	2	3	4	5	6				
projects, would not result in significant cumulative impacts with respect to water supply.																	
UTIL-5: The proposed Project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	LTS	LTS	LTS	LTS	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	NMN	NMN	NMN	NMN
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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN	NMN	NMN	NMN	NMN

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	1	2	3	4	5	6		1	2	3	4	5	6
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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	LTS	No mitigation necessary.	NMN	NMN	NMN	NMN	NMN	NMN
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	PS	PS	UTIL-15: To ensure that future development would comply with applicable solid waste regulations, the proposed Plan shall include policies that address the following topics: <ul style="list-style-type: none"> <li>Substantial landfill diversion by 2030, and ultimately zero waste.</li> <li>Reduced solid waste generation.</li> <li>Use of reusable, returnable, recyclable, and repairable goods.</li> <li>Enhanced recycling and composting programs for all waste generators.</li> </ul>	LTS	LTS	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	LTS	LTS	No mitigation necessary.	NMN	NMN	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	LTS	PS	PS	PS	PS	PS	UTIL-17: To ensure that future development would maximize energy efficiency and conservation the proposed Plan shall include policies that address the following topics:	LTS	LTS	LTS	LTS	LTS	LTS

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	1	2	3	4	5	6		1	2	3	4	5	6
distribution infrastructure or capacity enhancing alterations to existing facilities. However, without the adoption of policies in support of energy efficiency and conservation, the proposed Plan would result in a potentially significant impact, requiring mitigation.							<ul style="list-style-type: none"> <li>▪ Maximized conservation and efficient use of energy.</li> <li>▪ Continued procurement of carbon-neutral energy.</li> <li>▪ Investment in cost-effective energy efficiency and energy conservation programs.</li> <li>▪ Provision of public education programs addressing energy conservation and efficiency.</li> <li>▪ Use of cost-effective energy conservation measures in City projects and practices.</li> <li>▪ Adherence to State and federal energy efficiency standards and policies.</li> <li>▪ Consideration of a transition to a carbon-neutral natural gas supply.</li> </ul>						

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