

PUBLIC SERVICES AND RECREATION

4.12 PUBLIC SERVICES AND RECREATION

Public services are described as general services that are provided by the cities and other public agencies, such as schools, fire departments, police departments, libraries, and parks and recreation service providers. These services are important to maintaining the public health, safety, and welfare of the residents of Palo Alto, and contribute a better quality of life by providing parklands and opportunities for recreation as well as education.

This chapter evaluates the potential impacts to these services as a result of Scenarios 5 and 6. This analysis is based on the Regulatory Framework and Existing Conditions information provided in the February 2016 Draft EIR.

4.12.1 SCHOOLS

4.12.1.1 ENVIRONMENTAL SETTING

No revisions are required to the Regulatory Framework information presented in the February 2016 Draft EIR except for the following additional details regarding existing public schools (deletions are shown in ~~striketrough~~ and additions are underlined).

Existing Conditions

Public Schools

A small portion of Palo Alto, Monroe Park, is within the attendance boundaries of the Los Altos School District. This area, bounded by El Camino Real and San Antonio Road at the border with Mountain View, is already built out with existing single-family homes. No new development is foreseen within the boundaries of the Los Altos School District under any of the scenarios, and this District is not analyzed in the EIR.

4.12.1.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant impact to school services if it would:

- Result in an adverse physical impact from the construction of additional school facilities in order to maintain acceptable performance standards.

4.12.1.3 IMPACT DISCUSSION

The remaining subsections provide an analysis of the potential project impacts, including impacts from growth expected to occur during the life of the proposed Plan, as well as cumulative school impacts that

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could occur as a result of the implementation of the proposed Plan when combined with projects outside of Palo Alto.

The conclusions below are based on the same analytical approach used in the impact discussions in the February 2016 Draft EIR. The relevant characteristics of Scenarios 5 and 6 are described in detail in Section 3.4 of Chapter 3, Project Description, of this Supplement to the Draft EIR.

As described below, the State requires developer impact fees pursuant to Senate Bill (SB) 50 to support the development of new school facilities, and deems these as adequate to accommodate future growth. The City is prohibited from requiring additional mitigation to accommodate future growth beyond payment of developer fees. Nevertheless, for information purposes the discussion below describes student generation under each scenario and potential school capacity constraints.

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. (Less than Significant – Scenarios 5 and 6)

February 2016 Draft EIR Findings: Less than significant for Scenarios 1 through 4.

Summary of Supplemental Analysis: The impact would be less than significant for Scenarios 5 and 6.

Historically, the demand for school facilities has increased nearly proportionally to the amount of new housing that is built in the Palo Alto Unified School District (PAUSD) service area. As discussed in the February 2016 Draft EIR, enrollment has trended upward since 2001; however, enrollment in 2014 and 2015 at PAUSD elementary and high schools slightly decreased. Middle school enrollment had a slight increase from 2014 to 2015. Overall, enrollment was below capacity for elementary, middle, and high schools in 2014 and 2015.

As shown in Table 4.12-1 of the February 2016 Draft EIR, PAUSD elementary schools can accommodate up to 6,227 students, middle schools can accommodate up to 2,950 students, and high schools can accommodate up to 4,600 students. In the 2014-2015 school year, PAUSD elementary schools were below capacity by 550 students, middle schools were below capacity by 18 students, and high schools were below capacity by 760 students.

As shown in Table 4.12-3 of the February 2016 Draft EIR, PAUSD's enrollment forecasts released in the fall of 2014 expect elementary, middle, and high school enrollment to remain below capacity, with the exception of middle school enrollment for 2016 to 2018. More recent projections show that elementary and middle school enrollment will decline over the next five years. High school enrollment is projected to grow significantly beginning in 2017 and peak in 2020, and then decline following 2020. High school enrollment is not projected to exceed the total capacity of the Gunn and Palo Alto High Schools. The most

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recent PAUSD enrollment projections assume occupancy of 1,068 dwelling units by 2026 (including 578 units approved and to be completed in 2017 to 2021 and 490 units projected from 2020 to 2026),¹ whereas all scenarios considered in this EIR project substantially more residential growth over 15 years than assumed in the enrollment projections. Each discussion below includes a table of projected enrollment based on growth anticipated under each of the scenarios using student generation rates used in the 2015 PAUSD enrollment projections, which differ from the enrollment projections included in the February 2016 Draft EIR. As shown in the tables below, revised calculations based on the student generation rates in the 2015 PAUSD enrollment projections show an increase in student generation from the amount considered in the February 2016 Draft EIR.

Buildout projections under Scenarios 1 and 2 would be similar in that the proposed Plan would generate 3,880 new housing units, resulting in additional population growth of 9,405 new residents under each scenario. Therefore, impacts to school services under Scenarios 1 and 2 are discussed together. Assuming that all 3,880 units would be multi-family residential, Scenarios 1 and 2 would result in an expected growth in student enrollment for PAUSD of approximately 892 students in grades K-6, approximately 466 students in grades 7-8, and approximately 582 students in grades 9-12, totaling 1,940 students overall. Table 4.12-4 shows a breakdown of elementary, middle, and high school students that would be generated by implementation of the proposed Plan under Scenarios 1 and 2. This increase in enrollment would not exceed the capacity of existing PAUSD high schools, but would exceed the capacity of existing PAUSD elementary schools and middle schools under these scenarios.

Buildout projections under Scenarios 3 and 5 would be similar in that the proposed Plan would generate 4,710 new residential units, resulting in additional population growth of 11,240 new residents under each scenario. Assuming that all 4,710 units would be multi-family residential, Scenarios 3 and 5 would result in an expected growth in student enrollment for PAUSD of approximately 1,083 students in grades K-6, approximately 565 students in grades 7-8, and approximately 707 students in grades 9-12, totaling 2,355 students overall. Table 4.12-5 shows a breakdown of elementary, middle, and high school students that would be generated by implementation of the proposed Plan under Scenarios 3 and 5. This increase in enrollment would not exceed the capacity of existing PAUSD high schools, but would exceed PAUSD elementary schools and middle schools capacity under this scenario.

Buildout projections under Scenario 4 would generate 5,580 new housing units resulting in additional population growth of 13,260 new residents. Assuming that approximately all 5,580 units would be multi-family residential, Scenario 4 would result in an expected growth in student enrollment for PAUSD of approximately 1,283 students in grades K-6, approximately 670 students in grades 7-8, and approximately 837 students in grades 9-12, totaling 2,790 students overall. Table 4.12-6 shows a breakdown of elementary, middle, and high school students that would be generated by implementation of the proposed Plan under

¹ Decision Insite, December 13, 2016, presentation to the Palo Alto Unified School District entitled “2016 Enrollment Projection,” [http://www.boarddocs.com/ca/pausd/Board.nsf/files/AGKSN3736F18/\\$file/20161213EnrollmentProjection-ADDED.pdf](http://www.boarddocs.com/ca/pausd/Board.nsf/files/AGKSN3736F18/$file/20161213EnrollmentProjection-ADDED.pdf), accessed on January 20, 2017.

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TABLE 4.12-4 SCENARIOS 1 AND 2, ESTIMATED ENROLLMENT IN PAUSD (CITY + SOI)

Elementary School (K-6)	
Number of Units	3,880
Elementary School Generation Rates ^a	0.10 <u>0.23</u>
<i>Total Elementary School Students</i>	388 <u>893</u>
Middle School (7-8)	
Number of Units	3,880
Middle School Generation Rates ^a	0.04 <u>0.12</u>
<i>Total Middle School Students</i>	155 <u>466</u>
High School (9-12)	
Number of Units	3,880
High School Generation Rates ^a	0.04 <u>0.15</u>
<i>Total High School Students</i>	155 <u>582</u>
TOTAL STUDENTS	698 <u>1,940</u>

Notes:

This analysis assumes that all new housing would be multi-family housing.

This table is a reproduction and expansion of Table 4.12-4 in the February 2016 Draft EIR. Revisions to Table 4.12-4 are shown in ~~strikethrough~~ and underline.

a. ~~Student generation rates are based on data provided by Munoz, Betty, Administrative Assistant, Palo Alto Unified School District. Personal communication with Roland Rivera, City of Palo Alto, May 4, 2015. These generation rates are consistent with the generation rates used in the 2014 PAUSD Enrollment Projections prepared by Decision Insite.~~ Student generation rates are based on data provided by Roland Rivera, Land Use Analyst, City of Palo Alto, November 17, 2016. These generation rates are consistent with the generation rates used in the 2015 PAUSD Enrollment Projections prepared by Decision Insite. The Palo Alto Unified School District uses “moderate” generation rates that are typical of students enrolled from existing developments of similar product type, and “conservative” rates designed to anticipate a diminution in family size. Generation rates in Table 4.12-4 are consistent with the moderate (i.e., higher) rates.

Scenario 4. This increase in enrollment would exceed the capacity of existing PAUSD elementary schools, middle schools, and high schools under Scenario 4.

Buildout projections under Scenario 6 would generate 7,165 new housing units resulting in additional population growth of 16,885 new residents. Assuming that approximately all 7,165 units would be multi-family residential, Scenario 6 would result in an expected growth in student enrollment for PAUSD of approximately 1,648 students in grades K-6, approximately 860 students in grades 7-8, and approximately 1,075 students in grades 9-12, totaling 3,583 students overall. Table 4.12-A shows the number of elementary, middle, and high school students that would be generated by implementation of the proposed Plan under Scenario 6. This increase in enrollment would exceed the capacity of existing PAUSD elementary schools, middle schools, and high schools under Scenario 6.

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TABLE 4.12-5 SCENARIOS 3 AND 5, ESTIMATED ENROLLMENT IN PAUSD (CITY + SOI)

Elementary School (K-6)	
Number of Units	4,710
Elementary School Generation Rates ^a	0.10 <u>0.23</u>
<i>Total Elementary School Students</i>	471 <u>1,083</u>
Middle School (7-8)	
Number of Units	4,710
Middle School Generation Rates ^a	0.04 <u>0.12</u>
<i>Total Middle School Students</i>	188 <u>565</u>
High School (9-12)	
Number of Units	4,710
High School Generation Rates ^a	0.04 <u>0.15</u>
<i>Total High School Students</i>	188 <u>707</u>
TOTAL STUDENTS	847 <u>2,355</u>

Notes: This analysis assumes that all new housing would be multi-family housing.

This table is a reproduction and expansion of Table 4.12-5 in the February 2016 Draft EIR. Revisions to Table 4.12-5 are shown in ~~strike through~~ and underline.

a. ~~Student generation rates are based on data provided by Munoz, Betty, Administrative Assistant, Palo Alto Unified School District. Personal correspondence with Roland Rivera, City of Palo Alto, May 4, 2015. These generation rates are consistent with the generation rates used in the 2014 PAUSD Enrollment Projections prepared by Decision Insite.~~ Student generation rates are based on data provided by Roland Rivera, Land Use Analyst, City of Palo Alto, November 17, 2016. These generation rates are consistent with the generation rates used in the 2015 PAUSD Enrollment Projections prepared by Decision Insite. The Palo Alto Unified School District uses “moderate” generation rates that are typical of students enrolled from existing developments of similar product type, and “conservative” rates designed to anticipate a diminution in family size. Generation rates in Table 4.12-5 are consistent with the moderate (i.e., higher) rates.

As described above, elementary and middle school capacity would be exceeded under all six scenarios, and high school capacity would be exceeded under Scenarios 4 and 6.

Given that buildout would occur incrementally over the 15-year buildout horizon, impacts to schools regarding enrollment capacity would occur over that period of time and not all at once. In addition, while enrollment projections are expected to result in a slight increase between 2016 and 2020, as shown in Table 4.12-3 of the February 2016 Draft EIR, it is generally shown that PAUSD enrollment would begin to decrease after 2020.

Although increased enrollment would add stress to schools in PAUSD, this growth would occur over a period of approximately 15 years, resulting in a gradual increase in demand for school service in PAUSD. School impact fees would be charged to new residential and commercial development that occurs under the proposed Plan consistent with State law.

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TABLE 4.12-6 SCENARIO 4, ESTIMATED ENROLLMENT IN PAUSD (CITY + SOI)

Elementary School (K-6)	
Number of Units	5,580
Elementary School Generation Rates ^a	0.10 <u>0.23</u>
<i>Total Elementary School Students</i>	558 <u>1,283</u>
Middle School (7-8)	
Number of Units	5,580
Middle School Generation Rates ^a	0.04 <u>0.12</u>
<i>Total Middle School Students</i>	223 <u>670</u>
High School (9-12)	
Number of Units	5,580
High School Generation Rates ^a	0.04 <u>0.15</u>
<i>Total High School Students</i>	223 <u>837</u>
TOTAL	1,004 <u>2,790</u>

Notes: This analysis assumes that all new housing would be multi-family housing.

This table is a reproduction and expansion of Table 4.12-6 in the February 2016 Draft EIR. Revisions to Table 4.12-6 are shown in ~~strike through~~ and underline.

a. ~~Student generation rates are based on data provided by Munoz, Betty, Administrative Assistant, Palo Alto Unified School District. Personal correspondence with Roland Rivera, City of Palo Alto, May 4, 2015. These generation rates are consistent with the generation rates used in the 2014 PAUSD Enrollment Projections prepared by Decision Insite.~~ Student generation rates are based on data provided by Roland Rivera, Land Use Analyst, City of Palo Alto, November 17, 2016. These generation rates are consistent with the generation rates used in the 2015 PAUSD Enrollment Projections prepared by Decision Insite. The Palo Alto Unified School District uses “moderate” generation rates that are typical of students enrolled from existing developments of similar product type, and “conservative” rates designed to anticipate a diminution in family size. Generation rates in Table 4.12-5~~6~~ are consistent with the moderate (i.e., higher) rates.

This threshold addresses two components: the need for additional school facilities in order to maintain acceptable performance standards, and the adverse physical impact from the construction of additional school facilities. Subdivision (h) of California Government Code Section 65995 (enacted as SB 50) declares that the payment of development fees is “full and complete mitigation of the impacts of any legislative act [such as the approval of the Comprehensive Plan]... on the provision of adequate school facilities,” and impacts to PAUSD under all six scenarios would therefore be considered *less than significant*. In terms of the physical impacts of school construction, although new school facilities may be needed if projected increases in enrollment occur, it is unknown where or how school facilities would be expanded, and any school expansion or construction projects would be pursued by PAUSD as the lead agency. School districts are independent jurisdictions and the City would not have jurisdiction to approve, deny, or place conditions on a future school project. However, all new public school facilities are subject to site-specific CEQA and

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TABLE 4.12-A SCENARIO 6, ESTIMATED ENROLLMENT IN PAUSD (CITY + SOI)

Elementary School (K-6)	
Number of Units	7,165
Elementary School Generation Rates ^a	0.23
<i>Total Elementary School Students</i>	<i>1,648</i>
Middle School (7-8)	
Number of Units	7,165
Middle School Generation Rates ^a	0.12
<i>Total Middle School Students</i>	<i>860</i>
High School (9-12)	
Number of Units	7,165
High School Generation Rates ^a	0.15
<i>Total High School Students</i>	<i>1,075</i>
TOTAL	3,583

Note: This analysis assumes that all new housing would be multi-family housing.

a. Student generation rates are based on data provided by Roland Rivera, Land Use Analyst, City of Palo Alto, November 17, 2016. These generation rates are consistent with the generation rates used in the 2015 PAUSD Enrollment Projections prepared by Decision Insite. The Palo Alto Unified School District uses “moderate” generation rates that are typical of students enrolled from existing developments of similar product type, and “conservative” rates designed to anticipate a diminution in family size. Generation rates in Table 4.12-7 are consistent with the moderate (i.e., higher) rates.

California Board of Education evaluation to identify and mitigate potential environmental impacts. Therefore, the physical impacts of school construction would be *less than significant*.

Applicable Regulations:

- Senate Bill 50

Significance before Mitigation: It would be speculative to assess the environmental impacts of future school facility expansion, and the payment of school fees would be deemed to fully mitigate the impacts of new development on school facilities, per SB 50. Therefore, this impact would be less than significant.

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4.12.1.4 CUMULATIVE IMPACTS

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. (Less than Significant – Scenarios 5 and 6)
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February 2016 Draft EIR Findings: Less-than-significant cumulative impact for Scenarios 1 through 4.

Summary of Supplemental Analysis: The cumulative impact would be less than significant for Scenarios 5 and 6.

As described in the February 2016 Draft EIR, this section analyzes potential impacts related to schools that could occur from implementation of the Plan in combination with reasonably foreseeable growth in the area served by PAUSD. The PAUSD service area covers the city of Palo Alto as well as portions of the town of Los Altos Hills, portions of Portola Valley, and portions of the Stanford University campus. Therefore, some additional growth could occur within the PAUSD service area beyond what is anticipated by the Palo Alto Comprehensive Plan.

Where development falls within PAUSD boundaries, cumulative impacts resulting from future development in Los Altos Hills, portions of Portola Valley, and the Stanford University campus would generate new students to PAUSD, in addition to those generated by development allowed by the proposed Plan, which could result in the need for new or expanded school facilities. Although it is possible that new school facilities may be needed if projected increases in enrollment occur as a result of cumulative development, it is unknown where or how school facilities would be expanded. Therefore, it would be speculative to assess the potential environmental impacts associated with school facility expansions.

PAUSD is responsible for preparing its own projections of cumulative enrollment from district-wide development. All cumulative projects within the district would also be subject to the school mitigation fees discussed under Impact PS-1. As described in the impact discussions above regarding SB 50, the payment of impact fees is deemed to fully mitigate the impacts of new development on school facilities. Further, future cumulative development would occur incrementally over the next 15 years, and would be subject to project-level CEQA review and would identify school-related mitigation measures, if needed, at that time. Therefore, cumulative impacts related to school facilities under Scenarios 5 and 6 would be *less than significant*.

Applicable Regulations:

- Senate Bill 50

Significance before Mitigation: It would be speculative to assess the environmental impacts of future school facility expansion, and the payment of school fees is deemed to fully mitigate the impacts of new

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development on school facilities, per SB 50. Therefore, this cumulative impact would be less than significant.

4.12.2 FIRE PROTECTION SERVICES

4.12.2.1 ENVIRONMENTAL SETTING

No revisions are required to the Regulatory Framework and Existing Conditions information presented in the February 2016 Draft EIR.

4.12.2.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant impact to fire services if it would:

- Result in an adverse physical impact from the construction of additional fire protection facilities in order to maintain acceptable performance standards.

4.12.2.3 IMPACT DISCUSSION

The remaining subsections provide an analysis of the potential project impacts, including impacts from growth expected to occur during the life of the proposed Plan, as well as cumulative fire services impacts that could occur as a result of the implementation of the proposed Plan when combined with projects outside of Palo Alto.

The conclusions below are based on the same analytical approach used in the impact discussions in the February 2016 Draft EIR. The relevant characteristics of Scenarios 5 and 6 are described in detail in Section 3.4 of Chapter 3, Project Description, of this Supplement to the Draft EIR.

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. (Less than Significant– Scenarios 5 and 6)
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February 2016 Draft EIR Findings: Less than significant for Scenarios 1 through 4.

Summary of Supplemental Analysis: The impact would be less than significant for Scenarios 5 and 6.

As discussed in the February 2016 Draft EIR, a significant impact would result if, in order to ensure the Palo Alto Fire Department (PAFD) can adequately serve the Plan Area, increased demand would require the construction of new facilities or the expansion of existing facilities, the construction or operation of which would cause adverse environmental impacts.

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As shown in Table 3-5 in the Project Description of this Supplement to the Draft EIR, projected buildout under Scenarios 5 and 6 would result in up to 7,165 new housing units, up to 16,885 new residents, and up to 9,255 new employees. These increases are not expected to create an increased demand for fire services, which have been declining steadily and are now a minority of the calls PAFD responds to. However, emergency medical services in the PAFD service area are expected to increase incrementally over a 15-year period with both the increase in population and the aging of the population, which will occur under all scenarios. To meet this increased demand, PAFD would likely increase staffing for EMS delivery, including additional Firefighter Paramedics to staff Medic Units (Ambulances), as well as additional administrative support staff.² PAFD would likely require additional new apparatus and fire station improvements or expansions to accommodate new equipment, but would not anticipate the need to construct a new station, since development allowed under each scenario would be located in existing urbanized areas already served by existing PAFD stations.³ The City's approved infrastructure plan includes the replacement of two fire stations, and one of these replacement projects is well underway. These replacement projects will occur regardless of the proposed Plan.

Future development under Scenarios 5 and 6 would primarily occur in areas already developed, such as the California Avenue area and along El Camino Real, as well as Downtown and near Stanford Research Park. In general, future development under Scenarios 5 and 6 would be concentrated in close proximity to existing Fire Station 1, 2, and 6, as well as the existing Fire Administration building. There would be no new employment districts established under these scenarios, and new employees would be concentrated in either existing employment districts and/or areas where future development would be encouraged under Scenarios 5 and 6, all of which are areas already urbanized and served by the PAFD.

Because Scenarios 5 and 6 would allow fewer jobs than Scenarios 1 through 4, they would allow a smaller increase in the new employee population that could require PAFD services.

Although the PAFD currently does not meet its adopted response time for responding to calls for fire service 90 percent of the time within eight minutes, it does meet its other response time goals for responding to emergency medical service and paramedic calls. Further, the PAFD has attributed the increase in response times to methodology in how response times are calculated.⁴

Future remodeling or expansion of PAFD facilities to accommodate new equipment would be subject to separate project-level CEQA review in order to identify potential environmental impacts and mitigation measures as needed. In addition, under Scenarios 5 and 6, future development would be required to comply with the City's Fire Code, per Chapter 15.04 of the City's Municipal Code, including fire sprinklers, fire hydrants, water fire flow requirements, and design of driveway turnaround and access points to accommodate fire equipment. In addition, plan review by PAFD, development impact fees, and compliance

² Nickel, Eric. Fire Chief, Palo Alto Fire Department. Personal communication with PlaceWorks, November 3, 2016.

³ Capriles, Catherine. Deputy Fire Chief, Palo Alto Fire Department. Personal communication with PlaceWorks. November 2, 2016.

⁴ City of Palo Alto, 2016, Adopted Operating Budget Fiscal Year 2017, page 254.

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with the regulations described under Section 4.12.5.2 of the February 2016 Draft EIR would all serve to reduce the risk of fire in new development allowed under the updated Comp Plan. As such, while Scenarios 5 and 6 would require additional fire protection equipment and station improvements, a *less-than-significant* impact would occur with regard to the PAFD.

Applicable Regulations:

- California Code of Regulations, Division 1 of Title 9, Public Safety
- California Building Code, Title 24 Part 2
- California Fire Code, Title 24 Part 9
- Assembly Bill 337, Sections 51175-51189
- California Public Resources Code, Section 4210, Fire Protection Fee
- California Public Resources Code, Section 4290, Hazardous Fire Areas
- California Government Code
- California Health and Safety Code
- California Fire Plan

Significance before Mitigation: Development under Scenarios 5 and 6 would be subject to existing regulations and procedures that would prevent adverse physical impacts from the construction of additional fire protection facilities. Therefore, this impact would be less than significant.

4.12.2.4 CUMULATIVE IMPACTS

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. (Less than Significant – Scenarios 5 and 6)

February 2016 Draft EIR Findings: Less-than-significant cumulative impact for Scenarios 1 through 4.

Summary of Supplemental Analysis: The cumulative impact would be less than significant for Scenarios 5 and 6.

A significant cumulative environmental impact would result if, in combination with other past, present, and reasonably foreseeable development, buildout of the proposed Plan would exceed the ability of fire and emergency medical responders to adequately serve the vicinity, thereby requiring construction of new facilities or modification of existing facilities. This section analyzes potential impacts to fire protection services that could occur from the proposed Plan in combination with reasonably foreseeable growth in the PAFD service area.

As discussed in the February 2016 Draft EIR, the PAFD includes a service area that occupies approximately 50 square miles, including all of the land within the jurisdictional boundaries of Palo Alto and some

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unincorporated areas surrounding the city limit, primarily consisting of the Stanford University Campus. PAFD also maintains mutual aid agreements with the City of Menlo Park, CAL FIRE, the Central County Fire Department, the City of Mountain View, and the Woodside Fire Protection District, in addition to providing services to the Town of Los Altos during summer months to respond to increased fire risk.

All future development within the PAFD service area would be required to comply with State and local regulations, including Building and Fire Code requirements, and be reviewed by the PAFD to ensure risks associated with fire hazards be minimized. Further, individual projects permitted under the Comp Plan, as well as cumulative development projects, would be subject to separate project-level CEQA review which would identify potential environmental impacts and mitigation measures as needed. Therefore, the cumulative impact under Scenarios 5 and 6 would be *less than significant*.

Applicable Regulations:

- California Code of Regulations, Division 1 of Title 9, Public Safety
- California Building Code, Title 24 Part 2
- California Fire Code, Title 24 Part 9
- Assembly Bill 337, Sections 51175-51189
- California Public Resources Code, Section 4210, Fire Protection Fee
- California Public Resources Code, Section 4290, Hazardous Fire Areas
- California Government Code
- California Health and Safety Code
- California Fire Plan
- Palo Alto Municipal Code, Chapter 2.08.180, Fire Department
- Palo Alto Municipal Code, Chapter 15.04, Fire Code

Significance before Mitigation: Cumulative development would be subject to existing State and local regulations and procedures, and would be subject to CEQA review to identify potential environmental impacts and mitigation measures as needed. Therefore, this impact would be less than significant under Scenarios 5 and 6.

4.12.3 POLICE PROTECTION SERVICES

4.12.3.1 ENVIRONMENTAL SETTING

No revisions are required to the Regulatory Framework and Existing Conditions information presented in the February 2016 Draft EIR.

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4.12.3.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant impact to police services if it would:

- Result in an adverse physical impact from the construction of additional police protection facilities in order to maintain acceptable performance standards.

4.12.3.3 IMPACT DISCUSSION

The remaining subsections provide an analysis of the potential project impacts, including impacts from growth expected to occur during the life of the proposed Plan, as well as cumulative police protection services impacts that could occur as a result of the implementation of the proposed Plan when combined with projects outside of Palo Alto.

The conclusions below are based on the same analytical approach used in the impact discussions in the February 2016 Draft EIR. The relevant characteristics of Scenarios 5 and 6 are described in detail in Section 3.4 of Chapter 3, Project Description, of this Supplement to the Draft EIR.

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. (Less than Significant– Scenarios 5 and 6)

February 2016 Draft EIR Findings: Less than significant for Scenarios 1 through 4.

Summary of Supplemental Analysis: The impact would be less than significant for Scenarios 5 and 6.

As discussed in the February 2016 Draft EIR, a significant impact would result if, in order to ensure the Palo Alto Police Department (PAPD) and Santa Clara County Sheriff (SCCS) can adequately serve the Plan Area, increased demand would require the construction of new facilities or the expansion of existing facilities, the construction or operation of which would cause significant environmental impacts.

Palo Alto Police Department

Because Scenarios 5 and 6 would allow fewer jobs than Scenarios 1 through 4, they would allow a smaller increase in the new employee population that could require PAPD services. Although Scenarios 5 and 6 would result in varying amounts of housing, population, and employees, future development under these scenarios would be encouraged to develop in areas that are already urbanized, all of which are currently served by the PAPD and within the city limit of Palo Alto. Moreover, many of the areas where development would be encouraged are located either in or around the downtown, California Avenue, El Camino Real, and the Stanford Research Park. These areas are all within close proximity to the existing PAPD station and easily accessible. However, the PAPD has indicated that the existing police station is inadequate to

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accommodate current and future needs and that plans are underway for a new facility.⁵ On December 12, 2016, the City Council approved a contract to begin the design for a new public safety building on Parking Lot C-6 in the California Avenue business district.

Future construction or expansion of the PAPD facility would be subject to separate project-level CEQA review in order to identify potential environmental impacts and mitigation measures as needed. As such, while both scenarios would require additional police protection services, a new police station is already being planned to accommodate current and future needs of the city, which would ensure that adequate police services are provided without causing significant environmental impacts. Therefore, a *less-than-significant* impact would occur with regard to the PAPD.

Santa Clara County Sheriff

Although Scenarios 5 and 6 would result in varying amounts of housing, population, and employees, future development under these scenarios would be encouraged to develop in areas that are already urbanized and near existing neighborhood services and transit-rich areas, all of which are currently within the Palo Alto city limit and served by the PAPD. Therefore, it is not expected that the Comp Plan would result in direct growth or impact to the unincorporated areas of the EIR Study Area, given that Scenarios 5 and 6 are intended to encourage infill development within the city limit. As such, the SCCS is not likely to be directly impacted as a result of future development under the Comp Plan. Further, as stated above, future development under the Comp Plan would be subject to separate project-level CEQA review in order to identify potential environmental impacts and mitigation measures as needed. Consequently, both scenarios would result in a *less-than-significant* impact related to police protection services provided by the SCCS.

Applicable Regulations:

- Palo Alto Municipal Code Chapter 2.08.170, Police Department
- Palo Alto Municipal code Chapter 16.58.050, Public Safety and Government Facilities Fees

Significance before Mitigation: Development would be subject to existing regulations and procedures, and would be subject to project-level CEQA review in order to identify potential environmental impacts and mitigation measures needed. Therefore, this impact would be less than significant under Scenarios 5 and 6.

⁵ Hagerman, Ian. Senior Administrator, Palo Alto Police Department. Personal communication with PlaceWorks. November 1, 2016.

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4.12.3.4 CUMULATIVE IMPACTS

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. (Less than Significant – Scenarios 5 and 6)

February 2016 Draft EIR Findings: Less-than-significant cumulative impact for Scenarios 1 through 4.

Summary of Supplemental Analysis: The cumulative impact would be less than significant for Scenarios 5 and 6.

As discussed in the February 2016 Draft EIR, this analysis takes into account growth projected by the proposed Plan within the city limit and SOI, in combination with impacts from projected growth in the rest of Santa Clara County and the surrounding region, as forecast by the Association of Bay Area of Governments (ABAG); however, the PAPD service area only covers jurisdictional areas of Palo Alto, and the Stanford University Department of Public Safety provides public safety services for the Stanford Campus, along with the SCCS providing police protection in unincorporated areas of Palo Alto. Cumulative impacts are considered in the context of the growth from development under Scenarios 5 and 6 within the city and the service area of the PAPD, combined with the estimated growth in the service areas of the Santa Clara County Sheriff’s Department, including the cities of, Saratoga, Los Altos Hills, the community of Moffett Field, and unincorporated areas of Santa Clara County.

As discussed in the February 2016 Draft EIR, a significant cumulative environmental impact would result if this cumulative growth would exceed the ability of PAPD and SCCS to adequately serve the vicinity, thereby requiring construction of new facilities or modification of existing facilities.

It is unlikely that implementation of the Comp Plan would significantly increase the degree or incidence of need for mutual aid from neighboring agencies because anticipated growth under the Comp Plan would occur incrementally throughout the 15-year buildout horizon. Additionally, Police Department review of site plans and building designs to promote safety and crime prevention, as well as continuously reviewing and monitoring law enforcement services in the city and plan infrastructure would ensure that the PAPD continue to adequately meet the demands of the city and are able to accommodate growth. Further, given that both scenarios encourage infill development within the city limit, it is unlikely that cumulative impacts would occur to the SCCS given that they do not patrol areas within the city limit. However, if it is determined that additional police protection facilities are needed as growth occurs, expansion and/or construction would be subject to separate CEQA review, thereby providing an opportunity to identify and mitigate associated environmental impacts. Therefore, the Comp Plan would have a *less-than-significant* cumulative effect with respect to police protection services.

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Applicable Regulations:

- Palo Alto Comprehensive Plan
- Palo Alto Municipal Code Chapter 2.08.170, Police Department
- Palo Alto Municipal Code Chapter 16.58.050, Public Safety and Government Facilities Fees

Significance before Mitigation: Cumulative development would be subject to existing regulations and procedures, and police facility expansion/construction would be subject to separate project-level CEQA review. Therefore, this impact would be less than significant under Scenarios 5 and 6.

4.12.4 PARKS AND RECREATION

4.12.4.1 ENVIRONMENTAL SETTING

No revisions are required to the Regulatory Framework and Existing Conditions information presented in the February 2016 Draft EIR except for the following additional detail regarding County trails (deletions are shown in ~~striketrough~~ and additions are underlined).

Existing Conditions

County Regional and State Parks

In the general vicinity of Palo Alto, there are a variety of State, County, and regional parks and trails, which further reduce the demand for city-owned and operated facilities. State parks in the region include Portola Redwoods, Burleigh Murray Ranch, Loghry, Castle Rock, Butano, and Big Basin State Parks. In addition to these facilities, there are several State beaches in driving distance of Palo Alto, including Pomponio, Pescadero, and Bean Hollow State Beaches. Regional parks in the area include Coyote Hills Regional Park, Upper Stevens Creek County Park, and the Eden Landing East Bay Regional Park across the San Mateo Bridge. County trails in the SOI include the following:

- Juan Bautista de Anza
- Bay Area Ridge Trail: Santa Cruz Mountain
- Stevens Creek Sub-Regional Trail
- Adobe Creek Connecting Trail
- Matadero Creek-Page Mill Sub-Regional Trail

4.12.4.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant impact to parks and recreation services if it would:

- Result in an adverse physical impact from the construction of additional parks and recreation facilities in order to maintain acceptable performance standards.

PUBLIC SERVICES AND RECREATION

4.12.4.3 IMPACT DISCUSSION

The remaining subsections provide an analysis of the potential project impacts, including impacts from growth expected to occur during the life of the proposed Plan, as well as cumulative parks and recreation services impacts that could occur as a result of the implementation of the proposed Plan when combined with projects outside of Palo Alto.

The conclusions below are based on the same analytical approach used in the impact discussions in the February 2016 Draft EIR. The relevant characteristics of Scenarios 5 and 6 are described in detail in Section 3.4 of Chapter 3, Project Description, of this Supplement to the Draft EIR.

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. (Significant and Mitigable – Scenarios 5 and 6)

February 2016 Draft EIR Findings: Significant and mitigable for Scenarios 1 through 4. Mitigation Measure PS-7 would apply to all four scenarios and would reduce the impact to a less-than-significant level.

Summary of Supplemental Analysis: The impact would be significant and mitigable for Scenarios 5 and 6 and Mitigation Measure PS-7 would reduce the impact to a less-than-significant level. Mitigation Measure PS-7 has been revised, as shown below. These revisions will also be applied to the mitigation for Scenarios 1 through 4. The revisions do not change the original intent or effectiveness of Mitigation Measure PS-7.

Mitigation Measure PS-7: To address the potential physical impacts of ~~necessary property acquisition and~~ park construction/improvement, the Comprehensive Plan Update and/or the Parks, Trails, Natural Open Space and Recreation Master Plan shall incorporate policies ~~and programs~~ addressing ~~funding, community input, and environmental review, as follows~~ the following topic:

- Evaluation and mitigation of construction impacts associated with park and recreational facility creation and expansion.
- ~~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.~~

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- 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.
- Consider utilizing park impact and park dedication (in lieu) fees to rehabilitate, expand, or otherwise increase utilization of existing parks and recreation facilities.

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.

This threshold addresses two components: the need for additional park and recreational facilities in order to maintain acceptable performance standards, and the adverse physical impact from the construction of additional park and recreational facilities. As described above, the City of Palo Alto has an adopted policy of 4 acres of neighborhood and district parkland for every 1,000 residents and a parkland dedication standard of 5 acres of parkland (including open space) for every 1,000 residents. Based on an existing population of 65,685 in 2014 and the adopted parkland standard, Palo Alto should currently provide 262.7 acres of neighborhood and district parkland.⁶ There is an existing total of 173.4 acres of neighborhood and district parkland, 89 acres below the adopted policy.

All scenarios, including Scenarios 5 and 6, would allow growth in the number of both residents and workers in Palo Alto and would therefore increase the demand for parks and recreational facilities. To be conservative (i.e. represent a “worst case scenario”), this analysis assumes that all residential development under each scenario would be subject to the Park Land Dedication requirements in Chapter 21.50.040 of the Municipal Code.

Because Scenarios 5 and 6 would allow fewer jobs than Scenarios 1 through 4, they would allow a smaller increase in the new employee population that could use City parks. However, because the City’s parkland standard is based on residential population, the number of employees in each scenario is not used as the basis of the impact findings in this analysis.

⁶ 65,685 (existing population)/1,000 = 65.685 X 4 (# of acres per 1,000 residents of parkland) = 262.74 acres

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Scenario 5 would not result in changes to existing Comp Plan land use designations; however, it would include changes to the Zoning Code, as shown in Table 3-1 of this Supplement to the Draft EIR, which would somewhat reduce the residential development capacity of areas along South El Camino Real and San Antonio that are not immediately accessible to neighborhood services and transit, and shift that development capacity north to transit-rich areas with neighborhood services, such as the California Avenue area and Downtown. Similar to Scenario 3, Scenario 5 would result in 3,545 new housing units and a population increase of 8,435 within the city limit, however, the number of new employees would be 8,865, which would be less than the number of new employees projected under Scenario 3. Under this scenario, parkland dedication would be the same as under Scenario 3, given that the projected population increase is the same under both scenarios.

Scenario 6 would concentrate growth in transit-rich areas of the city where there is ample neighborhood services, and would seek to address the impacts of employment growth rather than slowing or controlling the rate of growth. As such, this scenario would include the most residential growth of the six scenarios. Scenario 6 would concentrate residential development along El Camino Real and in the Downtown, California Avenue area, Stanford Shopping Center, and western and El Camino frontage areas of the Stanford Research Park and Medical Center. At buildout, Scenario 6 would result in 6,000 new housing units, a population increase of 14,080, and 8,865 new employees within the city limit. Table 4.12-10 of the February 2016 Draft EIR has been revised to correct errors that appeared in the February 2016 Draft EIR and to include Scenarios 5 and 6. As shown in Table 4.12-10, Scenario 6 would require 56.3 acres of new parkland, the most parkland out of the six scenarios, in order to meet the City's requirement that new residential development provide 5 acres of parkland per 1,000 residents.

Overall, under all six scenarios the proposed Project would result in residential development increases that would increase population, and subsequently the demand to parks and recreation facilities throughout the city. As noted above, the City currently provides less parkland than required to meet its adopted policy for neighborhood and district parkland. The City's existing master planning effort suggests that the City is likely to add parks or recreational facilities over the life of the proposed Plan.

In addition, regardless of the existing deficiency, new residential development would be required to comply with the City's adopted Park Land Dedication requirements in the Municipal Code. Compliance with Chapter 21.50 of the Municipal Code would continue to require future development under all of the scenarios to dedicate parkland and/or pay in-lieu fees, and the ongoing master planning effort for the parks, trails, and open space system would develop strategies for the addition and improvement of park land. This also indicates that additional parks are likely to be added during the life of the proposed Plan. Because the exact locations of future residential or parkland development are not known at this time, it would be speculative to assess the physical environmental impacts associated with the construction of future park facilities. However, given the need for new parkland under all six scenarios, construction or expansion of new parks or recreation facilities would be expected and the impact would be considered *significant*, requiring mitigation under all six scenarios.

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TABLE 4.12-10 ACRES OF NEW PARKLAND NEEDED FOR NEW DEVELOPMENT (CITY LIMIT)

	<u>Existing (2014)</u>	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
<u>Existing parkland acreage (City only)^a</u>	<u>173.4</u>	=	=	=	=	=	=
<u>Existing population (City only)^b</u>	<u>65,685</u>	=	=	=	=	=	=
New population (City only)	=	<u>6,600</u> 9,405	<u>6,600</u> 9,405	<u>8,435</u> 11,240	<u>10,455</u> 13,260	<u>8,435</u>	<u>14,080</u>
Population ÷ 1,000	<u>65.69</u>	<u>6.60</u> 9.4	<u>6.60</u> 9.4	<u>8.44</u> 11.2	<u>10.46</u> 13.3	<u>8.44</u>	<u>14.08</u>
<u>New Additional acres needed based on Policy C-28/NRPA standard of 4 acres/1,000 new residents (neighborhood and district parks only)^c</u>	<u>89.3</u>	<u>26.4</u> 37.6	<u>26.4</u> 37.6	<u>33.8</u> 44.8	<u>41.8</u> 53.2	<u>33.8</u>	<u>56.3</u>
<u>Acres needed based on Parkland Dedication Standard of 5 acres/1,000 new residents (neighborhood and district parks only)^d</u>	<u>155.1</u>	<u>33.0</u>	<u>33.0</u>	<u>42.2</u>	<u>52.3</u>	<u>42.2</u>	<u>70.4</u>

Notes: This table is a reproduction and expansion of Table 4.12-10 in the February 2016 Draft EIR. Revisions to February 2016 Draft EIR Table 4.12-10 are shown in ~~strike through~~ and underline. To be conservative (i.e. represent a “worst case scenario”), since the affordability mix of individual projects is unknown at this time, this analysis assumes that all residential development under each scenario would be subject to the Park Land Dedication requirements in Chapter 21.50.040 of the Municipal Code. Under that chapter, 100 percent affordable projects are exempt.

a. Parkland acreage is calculated based on Table 4.12-9 in the February 2016 Draft EIR, and is equal to the total City parks acreage (173.4).
b. Population is calculated based on a housing unit vacancy rate of 5 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.
c. Additional acres needed for existing (2014) is calculated as follows: ((population/1,000) x (4 acres per 1,000 residents of parkland)) – (existing parkland acreage). Acres needed for Scenarios 1 through 6 is calculated as follows: ((new population/1,000) x (4 acres per 1,000 residents of parkland)).
d. Acres needed for existing (2014) is calculated as follows: ((population/1,000) x (5 acres per 1,000 residents of parkland)) – (existing parkland acreage). Acres needed for Scenarios 1 through 6 is calculated as follows: ((new population/1,000) x (5 acres per 1,000 residents of parkland)).
Source: PlaceWorks, City of Palo Alto, 2017.

Applicable Regulations:

- Palo Alto Municipal Code, Chapter 21.50

Significance before Mitigation: Scenarios 5 and 6 would require new parkland to accommodate new development and meet the City’s parkland standard, the construction of which could result in physical environmental impacts. Therefore, the impact is considered significant for Scenarios 5 and 6.

Mitigation Measures

Mitigation Measure PS-7 would apply to Scenarios 5 and 6.

Significance after Mitigation: Less than Significant.

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4.12.4.4 CUMULATIVE IMPACTS

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. (Potentially Significant and Mitigable– Scenarios 5 and 6)

February 2016 Draft EIR Findings: Potentially significant and mitigable for Scenarios 1 through 4. Mitigation Measure PS-8 would apply to all four scenarios and would reduce the impact to a less-than-significant level after mitigation:

Summary of Supplemental Analysis: The cumulative impact would be potentially significant and mitigable for Scenarios 5 and 6 and Mitigation Measure PS-8 would reduce the impact to a less-than-significant level.

Mitigation Measure PS-8: Implement Mitigation Measure PS-7, ~~above~~.

Although buildout of the proposed Plan would cumulatively increase the demand for park and recreational services in the city, compliance with the City’s Municipal Code would ensure that in-lieu fees and impact fees are collected for the creation of new or physically altered parks and recreational facilities to the extent feasible. Potential future cumulative impacts to Santa Clara County Parks would be mitigated through the contribution of property taxes to ensure facilities at these locations are adequately maintained and sufficient to accommodate growth associated with implementation of the proposed Plan. Future physical improvement projects or the creation of new parks or recreational facilities would be subject to separate CEQA review.

However, the location of new parkland has not been identified in either the city or the surrounding region; therefore the cumulative impact from new park construction would be *potentially significant*, requiring mitigation under Scenarios 5 and 6.

Applicable Regulations:

- Palo Alto Municipal Code, Chapter 21.50

Significance before Mitigation: The location of new parkland has not been identified in either the city or the surrounding region; therefore the cumulative impact from new park construction would be potentially significant, requiring mitigation under Scenarios 5 and 6.

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Mitigation Measure PS-8 would apply to Scenarios 5 and 6.

Significance after Mitigation: Less than Significant.

4.12.5 LIBRARIES

4.12.5.1 ENVIRONMENTAL SETTING

No revisions are required to the Regulatory Framework and Existing Conditions information presented in the February 2016 Draft EIR except for the following additional detail regarding existing library conditions (deletions are shown in ~~strike through~~ and additions are underlined).

Existing Conditions

The City of Palo Alto governs five community libraries at several locations throughout the city, as shown in Figure 4.12-2 of the February 2016 Draft EIR. As shown in Table 4.12-11, each library contains a collection of books, internet access, and a variety of online materials, as well as audio and video collections. Palo Alto also has an eBranch of the library which allows online access to books, music, and videos. All five library branches were renovated between 2006 and 2015 and are considered to be in good shape.⁷ The most recent renovations include the Mitchell Park Library and Rinconada Library (formerly Main Library). In 2014, the Mitchell Park Library branch opened, which is a 41,000-square-foot, two-story library, and includes a children's room, teen room, computer training room, quiet reading areas, and a 100 person program room. This library, the largest of the five, includes a selection of reference materials, magazines, newspapers, DVDs, books-on-CD, and music CDs, and the system's largest international languages collection. In 2015, the Rinconada Library ~~(formerly Main Library)~~ reopened after undergoing renovation. Rinconada Library includes a large collection of reference materials, magazines, newspapers, a seed library, and media.

4.12.5.2 STANDARDS OF SIGNIFICANCE

The proposed Plan would result in a significant impact to library services if it would:

- Result in an adverse physical impact from the construction of additional library facilities in order to maintain acceptable performance standards.

4.12.5.3 IMPACT DISCUSSION

The remaining subsections provide an analysis of the potential project impacts, including impacts from growth expected to occur during the life of the proposed Plan, as well as library services impacts that could

⁷ Le Conge Ziesenhenné, Monique. Library Director, Palo Alto City Library. Personal communication with PlaceWorks, November 8, 2016.

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TABLE 4.12-11 SUMMARY OF LIBRARIES IN PALO ALTO

Library	Location	Amenities
Rinconada Library (formerly Main)	1213 Newell Road	Reference collection; Palo Alto Historical Association archives; wireless access, laptops for loan, public internet terminals
Children’s Library	1276 Harriet Street	Internet stations, media collections, children’s magazines, a preschool computer and wireless access, <u>community room, four study rooms, seed library, 3D printer</u>
College Terrace Branch Library	2300 Wellesley Street	CD and DVD collection, story times for young children, wireless access, laptops for loan
Downtown Branch Library	270 Forest Avenue	One small meeting room, <u>two study rooms</u> , collection of CDs, DVDs, magazines, newspapers, <u>3D printer</u>
Mitchell Park Branch Library	3700 Middlefield Road	Broad selection of reference materials, magazines and newspapers, DVDs and CDs, Books-on-CD, <u>international languages, citizenship, three study rooms, computer lab</u>

Note: This table is a reproduction and expansion of Table 4.12-11 in the February 2016 Draft EIR. Revisions to February 2016 Draft EIR Table 4.12-11 are shown in ~~strike through~~ and underline.

Source: City of Palo Alto, Branches of the Library, <http://www.cityofpaloalto.org/gov/depts/lib/branches/default.asp>, accessed October, 2015; Personal Communication with Monique le Conge Ziesenhenné. Library Director, November 8, 2016.

occur as a result of the implementation of the proposed Plan when combined with projects outside of Palo Alto.

The conclusions below are based on the same analytical approach used in the impact discussions in the February 2016 Draft EIR. The relevant characteristics of Scenarios 5 and 6 are described in detail in Section 3.4 of Chapter 3, Project Description, of this Supplement to the Draft EIR.

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. (Less than Significant– Scenarios 5 and 6)

February 2016 Draft EIR Findings: Less than significant for Scenarios 1 through 4.

Summary of Supplemental Analysis: The impact would be less than significant for Scenarios 5 and 6.

Scenario 5 would result in 4,710 new housing units, a population increase of 11,240, and 9,255 new employees. Scenario 6 would result in 7,165 new housing units, a population increase of 16,885, and 9,255 new employees. Because Scenarios 5 and 6 would allow fewer jobs than Scenarios 1 through 4, they would allow a smaller increase in the new employee population that could require library services. While an overall increase in residents and daytime population (employees) is expected under both scenarios, service growth under the proposed Project would occur incrementally throughout the 15-year horizon; therefore, potential impacts from increased demand from library services would not occur in the immediate future.

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The Palo Alto Library has indicated that the Children’s Library would need to be renovated within the next two years to accommodate existing demand.⁸ However, in recent years attendance and circulation has shifted from the Children’s Library to Mitchell Park Library which may offset the growing demand for the service area at the Children’s Library.⁹ As described in the February 2016 Draft EIR, future development would be required to contribute impact fees to offset potential impacts from increased demand in library facilities and to ensure library facilities remain adequate.

Overall, the proposed Project would result in an increased development throughout the city that would increase population, and subsequently the demand to library facilities throughout the city. However, because buildout would occur incrementally throughout the 15-year horizon, potential impacts from increased demand on library services would not occur in the immediate future. In addition, future development would be subject to comply with the Municipal Code Chapter 16.58, which would ensure that future development provide their fair-share of costs to help maintain libraries within Palo Alto. Furthermore, compliance with the goals of the Palo Alto City Library Strategic Plan would ensure that the needs of library users are met. Thus, impacts to library services under Scenarios 5 and 6 would be *less than significant*.

Applicable Regulations:

- Mello-Roos Community Facilities Act of 1982
- Palo Alto City Library Strategic Plan
- Palo Alto Municipal Code Chapter 16.58 Development Impact Fees

Significance before Mitigation: Future development under the proposed Plan would be subject to existing City regulations and procedures, and would occur incrementally over the next 15 years, ensuring that implementation of the proposed Plan would not result in an adverse physical impact from the construction of additional library facilities. Therefore, this impact would be less than significant under Scenarios 5 and 6.

4.12.5.4 CUMULATIVE IMPACTS

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. (Less than Significant–Scenarios 5 and 6)
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February 2016 Draft EIR Findings: Less-than-significant cumulative impact for Scenarios 1 through 4.

⁸ Le Conge Zieshenne, Monique. Library Director, Palo Alto City Library. Personal communication with PlaceWorks, November 8, 2016.

⁹ Le Conge Zieshenne, Monique. Library Director, Palo Alto City Library. Personal communication with PlaceWorks, November 8, 2016.

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Summary of Supplemental Analysis: The cumulative impact would be less than significant for Scenarios 5 and 6.

As discussed in Chapter 4, Environmental Evaluation, the February 2016 Draft EIR takes into account growth projected by the proposed Project within the Palo Alto city boundary and SOI, in combination with impacts from projected growth in the rest of Santa Clara County and the surrounding region, as forecast by the ABAG. As described above, the City would require new residential and commercial pay their fair share of costs to mitigate impacts related to increased demand to library services through compliance with Municipal Code Chapter 16.58, which would help to ensure that Palo Alto libraries remain adequate to accommodate future growth. A significant cumulative environmental impact would occur if this cumulative growth would exceed the ability of the Palo Alto Library to adequately serve the service area, thereby requiring construction of new facilities or modification of existing facilities.

As discussed in the February 2016 Draft EIR, all of the libraries underwent renovation from 2006 and 2015 to expand services and collections, with the most recent revisions occurring at the new 41,000-square-foot Mitchell Park Library and the Rinconada (formerly Main) Library. Further, future development under implementation of the Plan would be subject to library impact fees to offset increased demand in library services. If library expansion or improvements are identified, additional project-specific environmental analysis pursuant to CEQA would apply to identify any potential environmental impacts associated with future expansion of libraries, if required. Overall, because future development would pay their fair share of impact fees, all five libraries were recently renovated and/or expanded, and because development under the Plan would occur incrementally over 15 years, a *less-than-significant* cumulative impact would occur under Scenarios 5 and 6.

Applicable Regulations:

- Mello-Roos Community Facilities Act of 1982
- Palo Alto City Library Strategic Plan
- Palo Alto Municipal Code Chapter 16.58, Development Impact Fees

Significance before Mitigation: Development would be subject to existing State, regional, and City regulations and procedures, including project-level CEQA review that would identify and mitigate potential impacts that future development would have on library services in the city. Therefore, this impact would be less than significant under Scenarios 5 and 6.

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