

1. Executive Summary

This Final Environmental Impact Report (EIR) has been prepared to provide an assessment of the potential environmental consequences of adopting and implementing the proposed City of Palo Alto Comprehensive Plan Update (proposed Plan) and associated zoning amendments. The Final EIR contains responses to comments received on a Draft EIR and a Supplement to the Draft EIR, both of which are incorporated here by reference and are available online at <http://www.paloaltocompplan.org/eir/>. The Final EIR also contains corrections and clarifications to the text and analysis of the Draft EIR and Supplement to the Draft EIR, where warranted.

CEQA (California Environmental Quality Act, California Public Resources Code, Division 13, Section 21000, *et seq.*) requires that State and local public agencies analyze projects to determine potential impacts on the environment and disclose any such impacts. This EIR has been prepared pursuant to the requirements of CEQA 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.¹ The proposed Plan and associated rezoning is considered a "project" subject to environmental review because it is "an action [undertaken by a public agency] which has the potential for resulting in either a direct physical change in the environment or a reasonably foreseeable indirect physical change in the environment."² Typically, for larger projects, this analysis takes the form of an EIR. CEQA stipulates that an EIR must not only analyze a project's potential environmental effects, but also attempt to address those effects either through feasible mitigation measures or alternatives to the project.

1.1 ENVIRONMENTAL REVIEW PROCESS

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. The scenarios were developed to capture the range of possible outcomes to the Comprehensive Plan Update process, including a "Business as Usual" scenario in which the proposed Plan would not be adopted. This process of preparing the EIR concurrent with the preparation and consideration of the proposed Plan is intended to allow the Comprehensive Plan that is adopted to take into account any potential environmental impacts identified in the EIR, and include policies to address those impacts. The February 2016 Draft EIR is available on the City

¹ California Environmental Quality Act Guidelines, Section 15002(a). The CEQA Guidelines are found at California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387.

² CEQA, Section 21080(d), and CEQA Guidelines, Section 15378[a].

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of Palo Alto's website (<http://www.paloaltocompplan.org/eir/>) and can be reviewed in hard-copy at City Hall or City of Palo Alto libraries.

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. A recirculated Draft EIR (referred to as the "Supplement to the Draft EIR") was subsequently prepared to assess the two additional scenarios, called Scenarios 5 and 6. The Supplement to the Draft EIR was a recirculated EIR prepared in accordance with CEQA Guidelines Section 15088.5, which contains provisions regarding recirculation of an EIR. The Supplement to the Draft EIR was published on February 10, 2017 for a 49-day comment period ending March 31, 2017. During the public review period, both the Planning and Transportation Commission (PTC) and the City Council held public meetings for members of the public to offer comments on the February 2016 Draft EIR and Supplement to the Draft EIR. The Supplement to the Draft EIR is available on the City of Palo Alto's website (<http://www.paloaltocompplan.org/eir/>) and can be reviewed in hard-copy at City of Palo Alto libraries.

This Final EIR will be considered at a PTC hearing, after which the PTC will make a recommendation to the City Council on certification of the EIR and adoption of the proposed Plan. The City Council will consider the PTC's recommendations and will take final action with regard to certification of the Final EIR.

After the City Council certifies the Final EIR, it will then consider the proposed Plan and associated rezoning. The City Council will also be asked to adopt and incorporate into the project all feasible mitigation measures identified in the EIR.

In some cases, the City Council may find that certain mitigation measures are outside the jurisdiction of the City to implement, or that no feasible mitigation measures have been identified for a given significant impact. In that case, the City Council may determine that economic, legal, social, technological, or other benefits of the proposed Plan outweigh the unavoidable, significant effects on the environment, and would prepare a statement of overriding considerations that reflects the ultimate balancing of competing public objectives. A statement of overriding considerations reflects the lead agency's views on the ultimate balancing of merits of approving a project despite its environmental damage, and states specific reasons supporting the leading agency's action.

1.2 MITIGATION MONITORING

Public Resources Code Section 21081.6 requires that the lead agency adopt a monitoring or reporting program for any project for which it has made findings pursuant to Public Resources Code 21081 or adopted a Negative Declaration pursuant to Public Resources Code Section 21080(c). Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR or Negative Declaration. The Mitigation Monitoring and Reporting Program for the proposed Plan will be completed after preparation of the Final EIR, and will be considered as part of the City Council's decision to adopt the proposed Update and their review of the Final EIR.

1.3 REPORT ORGANIZATION

This Final 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 based on the findings of the February 2016 Draft EIR and Supplement to the EIR and this Final EIR, describes recommended mitigation measures, and indicates the level of significance of environmental impacts before and after mitigation. Includes a reprint of Table 1-3, Summary of Impacts and Mitigation Measures, from the Supplement to the Draft EIR with revisions resulting from the public review process.
- **Chapter 2: Preferred Scenario.** Describes the preferred scenario that has been chosen for the proposed Plan and compares it to Scenarios 1 through 6. This chapter presents information showing that the impacts of the preferred scenario fall within the range of impacts previously analyzed for Scenarios 1 through 6 evaluated in the February 2016 Draft EIR and Supplement to the EIR.
- **Chapter 3: Revisions to the February 2016 Draft EIR and Supplement to the Draft EIR.** Presents revisions to the text and graphics of the February 2016 Draft EIR and Supplement to the Draft EIR. Double underline text represents language that has been added to the EIR; text with ~~strike through~~ has been deleted from the EIR.
- **Chapter 4: List of Commenters.** Lists the comment letters received from agencies and the public on the February 2016 Draft EIR and Supplement to the Draft EIR.
- **Chapter 5: Comments and Responses.** Presents comments received from agencies and the public on the February 2016 Draft EIR and Supplement to the Draft EIR alongside responses to each comment. Also contains “master responses” that provide comprehensive responses to key issues raised by several commenters, including the following: school impacts; growth projections from cumulative development, including the Stanford General Use Permit; and comments related to the merits of the proposed Plan, rather than environmental impacts or alternatives.
- **Appendices:** The appendix for the Final EIR contains the following:
 - Appendix J: Comment Letters. This appendix contains all comments received on the February 2016 Draft EIR and Supplement to the Draft EIR in their original format.

As noted earlier, the February 2016 Draft EIR and the Supplement to the Draft EIR are available online and incorporated here by reference. They constitute part of the Final EIR.

1.4 SUMMARY OF THE PREFERRED SCENARIO

The preferred scenario represents an updated Comprehensive Plan that would maintain the vision and values of the 1998 Comp Plan, supporting them with updated policies and implementation programs better reflecting the world of today.

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The City Council defined the basic parameters of the preferred scenario on March 20, 2017. The City Council developed the preferred scenario through its input and direction on elements of the proposed Comp Plan Update that it reviewed upon receipt of the Citizens Advisory Committee's (CAC) recommendations. The draft Comp Plan that was referred to the PTC by the City Council on June 12, 2017 and transmitted to the PTC on June 30, 2017 reflects the City Council's direction and constitutes the preferred scenario. The June 30, 2017 draft Comp Plan is available online at the following address: http://www.paloaltocompplan.org/wp-content/uploads/2017/07/PACompPlan_June30_PTC_webreduced.pdf.

The policy framework and associated implementation measures are anticipated to result in 3,545 to 4,420 new housing units, 8,435 to 10,455 new residents, and 9,850 to 11,500 new employees within the city by the 2030 plan horizon year. The preferred scenario would reduce the city's jobs/housing ratio from 3.06 jobs per employed resident to anywhere between 2.88 to 3.01 jobs per employed resident. Up to 3 million square feet of new office and research and development (R&D) space would be allowed in the city, of which approximately 1.3 million square feet have already been approved at the Stanford University Medical Center (SUMC). Additional information about the preferred scenario is provided in Chapter 2 of this Final EIR.

1.5 SUMMARY OF SCENARIOS 1 THROUGH 6

The February 2016 Draft EIR and Supplement to the Draft EIR together analyze six planning scenarios 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 1.** 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 164 new dwelling units per year), and ABAG's 2013 projection of job growth.
- **Scenario 2.** The second scenario was 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.

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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 3.** The third scenario would implement a growth management regime similar to the interim annual limit on office/R&D adopted by the City Council in 2015 for the fastest changing areas of the city and would eliminate housing sites along San Antonio and South El Camino Real. In place of these housing sites, Scenario 3 would increase housing densities on housing sites Downtown, near California Avenue, and in other locations in the city close to transit and services. Policies, regulations, and incentives would be designed to ensure smaller units for the working professional and senior populations of the city. Transportation investments would include grade separating the Caltrain crossings at Meadow Drive and Charleston Road by placing the railroad tracks in a trench.
- **Scenario 4.** The fourth scenario assumes the most growth in employment, consistent with the Association of Bay Area Governments’ (ABAG) 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 higher densities elsewhere and 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 5.** 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 interim annual limit on new non-residential square footage in a subset of the city 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 6.** 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 ABAG.

Housing and employment projections for the preferred scenario are presented alongside the projections for Scenarios 1 through 6 in Tables 1-1 and 1-2.

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TABLE 1-1 SUMMARY OF 2015 TO 2030 HOUSING AND EMPLOYMENT PROJECTIONS IN THE CITY

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Preferred Scenario
New Housing Units	2,720	2,720	3,545	4,420	3,545	6,000	3,545 to 4,420
New Population ^a	6,600	6,600	8,435	10,455	8,435	14,080	8,435 to 10,455
New Employees	15,480	9,850	12,755	15,480	8,865	8,865	9,850 to 11,500
New Employment Workspace (Square Feet) ^b	3,300,000	3,000,000	3,500,000	4,000,000	2,400,000	2,400,000	3,000,000

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 within the city limit, and an average household size of 2.0 in 2014 and 2030 within the sphere of influence (SOI). Household sizes were developed by City staff based on data in the Association of Bay Area Government's *Projections 2013*.

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 limit + 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, 2017.

TABLE 1-2 SUMMARY OF 2015 TO 2030 HOUSING AND EMPLOYMENT PROJECTIONS IN THE CITY AND SOI^a

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Preferred Scenario
New Housing Units	3,880	3,880	4,710	5,580	4,710	7,165	4,710 to 5,580
New Population ^b	9,405	9,405	11,240	13,260	11,240	16,885	11,240 to 13,260
New Employees	15,870	10,240	13,145	15,870	9,255	9,255	10,240 to 11,890

a. Master Response 2 in Chapter 5 of this Final EIR discussed the Stanford General Use Permit amendment and other projects in the SOI that were not proposed or approved at the time that this EIR was prepared.

b. 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 within the city limit, and an average household size of 2.0 in 2014 and 2030 within the SOI.

Source: PlaceWorks, City of Palo Alto, 2017.

1.6 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 mitigation measures identified in this Final 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

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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 and transportation and traffic.

Table 1-3 is arranged in four columns: 1) impact, 2) significance before mitigation, 3) mitigation measure, and 4) significance after mitigation. For a complete description of potential impacts, please refer to the specific discussions in Chapters 4.1 through 4.14 of the February 2016 Draft EIR and Supplement to the Draft EIR.

In some places, Table 1-3 incorporates changes to the mitigation measures of the Supplement to the Draft EIR. Revisions to mitigation measures are shown in ~~strike through~~ and underline.

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TABLE 1-3 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
Aesthetics and Visual Resources			
AES-1: Implementation of the proposed Plan would have the potential to substantially degrade the existing visual character or quality of the area and its surroundings.	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 <u>achieve</u> the following topics : <ul style="list-style-type: none"> ▪ High-quality building and site design. ▪ Compatibility with surrounding development and public spaces <u>the neighborhood and adjacent structures</u>. ▪ Enhancement of existing commercial centers. ▪ Requirements for landscaping and street trees. ▪ Preservation and creation of a safe and inviting pedestrian environment. ▪ Appropriate building form, massing, and setbacks. 	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	No mitigation necessary.	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	No mitigation necessary.	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.	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 shade and shadow impacts through feasible building and site design features.	LTS
AES-5: Implementation of the proposed Plan would not contribute to cumulative aesthetics impacts in the area.	LTS	No mitigation necessary.	NMN

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Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
Air Quality			
AIR-1: Without inclusion of air quality policies, implementation of the proposed Plan could conflict with or obstruct implementation of the applicable air quality plan.	PS	<p>AIR-1: To ensure consistency with the 2010 Bay Area Clean Air Plan, the proposed Plan shall include policies that address <u>achieve</u> the following topics:</p> <ul style="list-style-type: none"> ▪ Reduction in emissions of particulates from automobiles, manufacturing, construction activity, and other sources (e.g., dry cleaning, wood burning, landscape maintenance). ▪ Support for regional, State, and federal programs that improve air quality. ▪ Support for transit, bicycling, and walking. ▪ Mix of uses (e.g., housing near employment centers) and development types (e.g., infill) to reduce the need to drive. 	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	<p>AIR-2a: As part of the City's development approval process, the City shall amend its local CEQA Guidelines and Municipal Code to require, as part of the City's development approval process, that applicants for future development projects to comply with the current BAAQMD basic control measures for reducing construction emissions of PM₁₀ (Table 8-24, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the BAAQMD CEQA Guidelines).</p> <p>AIR-2b: The City shall amend its local CEQA Guidelines to require that, prior to issuance of construction permits, development project applicants that are subject to CEQA and have the potential to exceed the BAAQMD screening-criteria listed in the BAAQMD CEQA Guidelines shall prepare and submit to the City of Palo Alto a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with BAAQMD methodology in assessing air quality impacts. If construction-related criteria air pollutants are 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 8-22, 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</p>	SU

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		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: <u>Require</u> require compliance with BAAQMD requirements, including BAAQMD CEQA Guidelines.	
		AIR-2d: Implement Mitigation Measures <u>TRANS-1a</u> and <u>TRANS-1b</u> . In addition, to reduce long-term air quality impacts by emphasizing walkable neighborhoods and supporting alternative modes of transportation, the proposed Plan shall include policies that address <u>achieve</u> the following topic: <ul style="list-style-type: none"> ▪ Enhanced pedestrian and bicycle connections between commercial and mixed-use centers. 	
AIR-3: Implementation of the proposed Plan would expose sensitive receptors to substantial concentrations of air pollution.	S	<p>AIR-3a: The City of Palo Alto shall update 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"> ▪ Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible. ▪ Electrifying warehousing docks. 	LTS

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Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
		<ul style="list-style-type: none"> ▪ Requiring use of newer equipment and/or vehicles. ▪ Restricting off-site truck travel through the creation of truck routes. <p>Mitigation measures identified in the project-specific HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of a proposed project.</p>	
		<p>AIR-3b: 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_{2.5} 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: Require amend the City's CEQA guidelines to require compliance with BAAQMD requirements, including BAAQMD CEQA Guidelines.</p>	
		<p>AIR-3c: The City of Palo Alto shall update its CEQA Procedures proposed Plan shall include policies to mitigate potential sources of toxic air contaminants through siting or other means to reduce human health risks and meet the Bay Area Air Quality Management District's applicable threshold of significance. Policies shall also require that residential and other new sensitive land use projects (e.g., residences, schools, hospitals, nursing homes, parks or playgrounds, and day care centers) that are subject to CEQA and are not classified as exempt within 1,000 feet of a major stationary sources of TACs (e.g., warehouses, industrial areas, freeways, and roadways with traffic volumes over 10,000 vehicles per day consider potential health risks and incorporate adequate precautions, such as high-efficiency air filtration, into project design.) 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 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</p>	

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		<p>demonstrate that mitigation measures are capable of reducing potential cancer and non-cancer risks to an acceptable level (i.e., below 10 in one million or a hazard index of 1.0), including appropriate enforcement mechanisms.</p> <p>Measures and/or best practices to reduce risk may include but are not limited to:</p> <ul style="list-style-type: none"> * Air intakes located away from high volume roadways and/or truck loading zones. * Heating, ventilation, and air conditioning systems of the buildings provided with appropriately sized Maximum Efficiency Rating Value (MERV) filters. <p>Mitigation measures identified in the HRA and best practices shall be incorporated into the site development plan as a condition of approval. The air intake design and MERV filter requirements shall be noted and/or reflected on all building plans submitted to the City and shall be verified by the City.</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 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.</p>	
<p>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.</p>	<p>S</p>	<p>AIR-4: To reduce odor impacts, the proposed Plan shall include policies to address the following topic <u>requiring</u>:</p> <ul style="list-style-type: none"> ▪ Buffers, <u>mechanical</u>, and other mitigation methods to avoid <u>creating a nuisance</u>-human health impacts from sources of odor and/or toxic air contaminants. 	<p>LTS</p>
<p>Biological Resources</p>			
<p>BIO-1: The proposed Plan would not have a substantial adverse effect, either directly or through habitat modifications, on special-status species.</p>	<p>LTS</p>	<p>No mitigation necessary.</p>	<p>NMN</p>
<p>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</p>	<p>LTS</p>	<p>No mitigation necessary.</p>	<p>NMN</p>

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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.			
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	No mitigation necessary.	NMN
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	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	NMN
Cultural Resources			
CULT-1: Implementation of the proposed Plan could adversely affect a historic resource listed or eligible for listing on the National and/or California Register, or listed on the City's Historic Inventory.	S	<p>CULT-1: To ensure the protection of <u>potentially</u> 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 <u>achieve</u> the following topics:</p> <ul style="list-style-type: none"> ▪ The effectiveness of the Historic Preservation Ordinance in preserving historic resources. ▪ Periodic updates to and maintenance of the City's Historic Resource Inventory. ▪ Process for <u>reviewing proposed demolition or alteration of potentially historic buildings</u> including potential historic resources in the City's Historic Resources Inventory. ▪ Protection of archaeological resources. 	LTS
CULT-2: Implementation of the proposed Plan could eliminate important examples of major periods of California history or prehistory.	S	CULT-2: Implement Mitigation Measure CULT-1.	LTS
CULT-3: Implementation of the proposed Plan could cause damage to an important archaeological resource as defined in Section 15064.5 of the CEQA	PS	CULT-3: Implement Mitigation Measure CULT-1. In addition, to ensure that future development would not damage archaeological resources, the proposed	LTS

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TABLE 1-3 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
Guidelines.		Plan shall include policies that address <u>achieve</u> the following topics: <ul style="list-style-type: none"> ▪ Archaeological surveys and mitigation plans for future development projects. ▪ Developer compliance with applicable regulations regarding the identification and protection of archaeological and paleontological deposits, <u>and unique geologic features</u>. ▪ Adequate <u>Appropriate</u> tribal consultation and consideration of tribal concerns. 	
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	No mitigation necessary.	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.	PS	CULT-5: Implement Mitigation Measure CULT-3.	LTS
CULT-6: Implementation of the proposed Plan would <u>not</u> directly or indirectly destroy a local cultural resource that is recognized by City Council resolution.	S LTS	CULT-6: Implement Mitigation Measure CULT-1. <u>No mitigation necessary.</u>	LTS NMN
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	CULT-7: Implement Mitigation Measures CULT-1 and CULT-3.	LTS
Geology, Soils, and Seismicity			
GEO-1: Implementation of the proposed Plan would not expose people or structures to substantial adverse effects including the risk of loss, injury or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure (including liquefaction), landslides, or expansive soil.	LTS	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	NMN
GEO-4: Implementation of the proposed Plan would not cause substantial erosion or siltation.	LTS	No mitigation necessary.	NMN

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Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
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	No mitigation necessary.	NMN
Greenhouse Gas Emissions and Climate Change			
GHG-1: The proposed Plan would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	LTS	No mitigation necessary.	NMN
GHG-2: The proposed Plan could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, requiring mitigation.	LTS	No mitigation necessary.	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	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 <u>achieve</u> the following topics: <ul style="list-style-type: none"> ▪ Flooding Monitoring and response to flooding risks caused by climate change-related changes to precipitation patterns, groundwater levels, sea level rise, tides, and storm surges. ▪ Cooperative planning with federal, State, regional, and local public agencies on issues related to climate change (including sea level rise and extreme storms). ▪ Preparation of response strategies to address sea level rise, increased flooding, landslides, soil erosion, storm events, and other events related to climate change. ▪ <u>Implementation of adaptive strategies to address</u> impacts of sea level rise on Palo Alto's levee system. 	LTS
Hazards and Hazardous Materials			
HAZ-1: The proposed Plan would not create a significant hazard to the public or the environment as a result of the routine transport, use, or disposal of hazardous materials.	LTS	No mitigation necessary.	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	No mitigation necessary.	NMN

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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	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	NMN
HAZ-7: The proposed Plan would not impair implementation of or physically interfere with an adopted emergency response or evacuation plan.	LTS	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	NMN
Hydrology and Water Quality			
HYD-1: The proposed Plan would not violate any water quality standards or waste discharge requirements.	LTS	No mitigation necessary.	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	<p>HYD-2: To reduce potential impacts associated with construction dewatering the proposed Plan shall include policies that address <u>achieve</u> the following topics:</p> <ul style="list-style-type: none"> ▪ Impacts <u>Avoidance of the impacts</u> of basement construction for single-family homes on adjacent properties, public resources, and the natural environment <u>and safety</u>. ▪ Conservation of subsurface water resources. ▪ Reduced residential basement dewatering and other excavation activities. ▪ Construction techniques and recharge strategies to reduce subsurface and surface water impacts. ▪ Monitoring of dewatering and excavation projects. 	LTS

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Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
		<ul style="list-style-type: none"> ▪ Cooperation with other jurisdictions and regional agencies to protect groundwater. ▪ Protection of groundwater from the adverse impacts of urban uses <u>as a natural resource</u>. 	
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	No mitigation necessary.	NMN
HYD-4: The proposed Plan would not result in stream bank instability.	LTS	No mitigation necessary.	NMN
HYD-5: The proposed Plan would not significantly increase the rate, volume, or flow duration of storm water runoff in a manner which would result in new or increased flooding on-or off-site, or exceedance of the capacity of existing or planned stormwater drainage systems in local streams.	LTS	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	NMN
HYD-9: The proposed Plan would not be impacted by inundation by seiche, tsunami, or mudflow.	LTS	No mitigation necessary.	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	No mitigation necessary.	NMN
Land Use and Planning			
LAND-1: The proposed Plan could adversely change the type or intensity of existing or planned land use patterns in the area.	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 <u>address/achieve</u> the following topics :	LTS

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TABLE 1-3 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
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.	PS	<ul style="list-style-type: none"> ▪ Strengthening of residential neighborhoods. ▪ Vitality of commercial areas and public facilities. ▪ High-quality building and site design. ▪ Architectural compatibility of new development. ▪ Promotion of appropriate <u>Compatible</u> infill development. ▪ Gradual transitions <u>Avoidance of abrupt changes</u> in the scale of development where residential districts abut more intense uses. <p>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 <u>achieve</u> the following topic:</p> <ul style="list-style-type: none"> ▪ Architectural standards that address land use transitions. ▪ <u>Use of City procedures, plans, and requirements to ensure high-quality building design and architectural compatibility.</u> 	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	No mitigation necessary.	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	No mitigation necessary.	NMN
LAND-5: The proposed Plan could physically divide an established community.	PS	<p>LAND-5: To avoid potential impacts from physically dividing an established community, the proposed Plan shall include policies that address <u>achieve</u> the following topics:</p> <ul style="list-style-type: none"> ▪ Enhanced connections to and from parks, schools, and community facilities for all users. ▪ Safe and convenient pedestrian, bicycle, and transit connections between residential areas and commercial centers. ▪ Cooperation with other agencies to improve circulation connections. ▪ Grade separation of rail crossings. 	LTS
LAND-6: The proposed Plan would not conflict with an applicable habitat conservation plan or natural community plan.	LTS	No mitigation necessary.	NMN

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TABLE 1-3 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
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	No mitigation necessary.	NMN
Noise			
NOISE-1: Implementation of the proposed Plan would have the potential to cause the average 24-hour noise level (L_{dn}) to increase by 5.0 decibels (dB) or more in an existing residential area, even if the L_{dn} would remain below 60 dB.	PS	<p>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 <u>achieve</u> the following topics:</p> <ul style="list-style-type: none"> ▪ Location of land uses in areas with compatible noise environments. ▪ Use of the guidelines in the “Land Use Compatibility for Community Noise Environment” table <u>in the proposed Plan</u> to evaluate the compatibility of proposed land uses with existing noise environments. ▪ Clear guidelines for maximum outdoor noise levels in residential areas. ▪ Adherence to the interior noise requirements of the State of California Building Standards Code (Title 24) and the Noise Insulation Standards (Title 25). ▪ Inclusion of a noise contour map in the proposed Plan. ▪ Reduction of noise impacts of development on adjacent properties. ▪ Updating for clarity the Noise Ordinance to make enforcement easier. ▪ <u>Evaluation of noise impacts on existing residential, open space, and conservation land.</u> ▪ <u>Requirement for new projects in the Multiple Family, Commercial, Manufacturing, or Planned Community districts to demonstrate compliance with the Noise Ordinance.</u> <p>NOISE-1b: To ensure that reduce potential impacts to new land uses from 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 <u>achieve</u> the following topics:</p> <ul style="list-style-type: none"> ▪ Compliance with the airport-related land use compatibility standards for community noise environments. ▪ 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 	LTS

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Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
<p>NOISE-1: Implementation of the proposed Plan would not <u>have the potential to</u> cause the L_{dn} to increase by 3 dB or more in an existing residential area, thereby causing the L_{dn} in the area to exceed 60 dB.</p>	PS	<p>(CLUP) for the Palo Alto Airport.</p> <p>NOISE-1c: To ensure that <u>reduce potential impacts to new land uses from railway noise would not increase average 24 hour noise levels by 5.0 decibels (dB) or more in an existing residential area</u>, the proposed Plan shall include policies that address <u>achieve</u> the following topics:</p> <ul style="list-style-type: none"> ▪ Noise Minimization of noise <u>spillover from rail-related activities into adjacent residential or noise-sensitive areas.</u> ▪ Reduction of Building design that reduces <u>impacts from noise and ground borne vibrations associated with rail operations.</u> ▪ <u>Guidelines for interior noise levels.</u> ▪ Requirements for vibration impact analysis for future development projects. 	LTS
<p>NOISE-2: Implementation of the proposed Plan would <u>have the potential to</u> cause the L_{dn} to increase by 3 dB or more in an existing residential area, thereby causing the L_{dn} in the area to exceed 60 dB.</p>	PS	<p>NOISE-2: Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.</p>	LTS
<p>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_{dn} currently exceeds 60 dB.</p>	PS	<p>NOISE-3: Implement Mitigation Measures NOISE-1a, NOISE-1b, and NOISE-1c.</p>	LTS
<p>NOISE-4: Implementation of the proposed Plan would have the potential to result in indoor noise levels for residential development to exceed an L_{dn} of 45 dB.</p>	PS	<p>NOISE-4a: Implement Mitigation Measure NOISE-1a.</p>	LTS
<p>NOISE-5: Implementation of the proposed Plan would have the potential to expose persons to or generate excessive ground-borne vibration or ground-borne noise levels.</p>	PS	<p>NOISE-4b: The Land Use Noise Compatibility Guidelines established in the current 1998 <u>Comprehensive Plan shall be maintained under all six scenarios.</u></p> <p>NOISE-5a: To ensure that future development would not result in significant construction-related vibration impacts, the proposed Plan shall include policies that <u>limit the hours of construction around sensitive receptors, and require formal, ongoing monitoring and reporting throughout the construction process for larger development projects, as well as the use of pertinent industry standards and City guidelines to avoid significant vibration impacts during construction or operations.</u> address the following topics:</p> <ul style="list-style-type: none"> ▪ Requirements for construction and operations vibration impact analyses, to be prepared by a qualified acoustical consultant for development projects. ▪ Requirements for vibration mitigation plans to ensure compliance with the pertinent industry standards and City guidelines for projects that would 	LTS

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TABLE 1-3 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
		<p>experience vibration impacts during construction or operations.</p> <ul style="list-style-type: none"> Limits for construction and operations vibration around vibration sensitive receptors. <p>NOISE-5b: Implement Mitigation Measure NOISE-1c.</p>	
NOISE-6: Implementation of the proposed Plan would have the potential to expose people to noise levels in excess of established State standards.	PS	NOISE-6: Implement Mitigation Measures NOISE-4a and NOISE-4b.	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	NOISE-7: Implement Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-4a, and NOISE-4b.	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	<p>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 <u>achieve</u> the following topics:</p> <ul style="list-style-type: none"> Construction noise limits around sensitive receptors. Monitoring and reporting plans for construction noise levels of larger development projects. Noise control measures to ensure compliance with the noise ordinance. 	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	No mitigation necessary.	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	No mitigation necessary.	NMN
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	<p>NOISE-11a: Implement Mitigation Measure NOISE-1c.</p> <p>NOISE-11b: To preclude <u>address</u> overall community noise impacts that are in excess of established State and/or City standards <u>from train noise to the extent such noise is within the City's control and in excess of established State and/or City standards</u>, the proposed Plan shall include policies that address <u>achieve</u> the following topics:</p> <ul style="list-style-type: none"> Technological Efforts to develop and implement technological methods to 	LTS

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Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
		<ul style="list-style-type: none"> reduce train whistle noise from Caltrain. ▪ Evaluation of at-grade rail crossings as potential Quiet Zones based on Federal Railroad Administration (FRA) rules and guidelines. ▪ Grade separation of rail crossings as a City priority. 	
		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.	
Population and Housing			
POP-1: Implementation of the proposed Plan would have the potential to induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).	LTS	No mitigation necessary.	NMN
POP-2: Implementation of the proposed Plan would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.	LTS	No mitigation necessary.	NMN
POP-3: Implementation of the proposed Plan would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.	LTS	No mitigation necessary.	NMN
POP-4: Implementation of the proposed Plan would not create a substantial imbalance between employed residents and jobs.	LTS	No mitigation necessary.	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	No mitigation necessary.	NMN
Public Services and Recreation			
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	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	NMN

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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	No mitigation necessary.	NMN
PS-5: Implementation of the proposed Project would not result an adverse physical impacts from the construction of additional police protection facilities in order to maintain acceptable service ratios.	LTS	No mitigation necessary.	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	No mitigation necessary.	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	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 include policies addressing that achieve the following topic: <ul style="list-style-type: none"> ▪ Evaluation and mitigation of the construction impacts associated with park and recreational facility creation and expansion. 	LTS
PS-8: Implementation of the proposed Plan would have the potential to 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-8: Implement Mitigation Measure PS-7.	LTS
PS-9: Implementation of the proposed Plan would not result in an adverse physical impact from the construction of additional library facilities in order to maintain acceptable performance standards.	LTS	No mitigation necessary.	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	No mitigation necessary.	NMN
Transportation and Traffic			
TRANS-1: Implementation of the project would cause an intersection to drop below its motor vehicle level of service standard, or deteriorate operations at representative intersections that already operate at a substandard level of service.	S	TRANS-1a: Adopt a programmatic approach to reducing <u>motor vehicle traffic</u> , with the goal of achieving no net increase in peak <u>hour period</u> 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, Require <u>require</u> new development projects <u>above a specific size threshold to</u>	SU

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Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
		<p>prepare and implement a Transportation Demand Management (TDM) Plan to achieve the following reduction in peak-hour 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 <u>and size</u>. These reductions are deemed aggressive, yet feasible, for the districts indicated.</p> <ul style="list-style-type: none"> ▪ 45 percent reduction in the Downtown district ▪ 35 percent reduction in the California Avenue area ▪ 30 percent reduction in the Stanford Research Park ▪ 30 percent reduction in the El Camino Real Corridor ▪ 20 percent reduction in other areas of the city <p>TDM Plans must be approved by the City and monitored by the property owner <u>or the project proponent</u> on an annual basis. The Plans must contain enforcement mechanisms or penalties that accrue if targets are not met <u>and may achieve reductions by contributing to citywide or employment district shuttles or other proven transportation programs that are not directly under the property owner's control.</u></p>	
		<p><u>TRANS-1b: Require new development projects to pay a Transportation Impact Fee which will be partially used to reduce peak period motor vehicle trips citywide for all those peak-hour motor vehicle trips that cannot be reduced via TDM measures. Fees collected would be used for capital improvements aimed at reducing motor vehicle trips and motor vehicle traffic congestion.</u></p>	
		<p><u>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.</u></p>	
		<p><u>TRANS-1c: Include The proposed Plan shall 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 the undertaking of studies and outreach necessary to advance grade separation of Caltrain to become a "shovel ready" project.</u></p>	

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		TRANS-1d: <u>Consistent with State requirements, the City shall adopt a Multimodal Improvement Plan to address impacts to Congestion Management Program facilities. Engage</u> In addition, the proposed Plan shall include policies to <u>engage</u> 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-jump lanes, jumping and curbside platforms, <u>high-occupancy vehicle (HOV)/high-occupancy toll (HOT) lanes</u> , and additional VTA bus service.	
		TRANS-1e: Encourage The proposed Plan shall include policies to 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 operations that already operate at a substandard level of service.	LTS	No mitigation necessary.	NMN
TRANS-3: Implementation of the project would cause a freeway segment or ramp to drop below its level of service standard, or deteriorate operations that already operate at a substandard level of service.	S	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. TRANS-3b: include policies in the The proposed Comprehensive Plan shall <u>include policies</u> 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)/ <u>high-occupancy toll (HOT)</u> lanes on freeways and expressways, including the Dumbarton Bridge, and the continuation of an HOV lane from Redwood City to San Francisco.	SU
TRANS-4: Implementation of the project would not impede the function of planned bicycle or pedestrian facilities.	LTS	No mitigation necessary.	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
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	No mitigation necessary.	NMN
TRANS-6: Implementation of the project would impede the operation of a transit system as a result of congestion.	S	TRANS-6: Include policies in the <u>The proposed</u> Comprehensive Plan <u>shall include policies that address transit access and give priority to collaborate with transit agencies in planning for and implementing convenient, efficient, coordinated, and effective buses service and to 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.</u>	SU
TRANS-7: Implementation of the project would not create demand for transit services that cannot be met by current or planned services.	LTS	No mitigation necessary.	NMN
TRANS-8: Implementation of the project would create the potential demand for through traffic to use local residential streets.	S	TRANS-8: Include policies in the <u>The proposed</u> Comprehensive Plan <u>shall include policies to identify specific improvements that can be used to discourage non-local drivers from using local, neighborhood streets to bypass traffic congestion on arterials.</u>	LTS
TRANS-9: Implementation of the project would create an operational safety hazard.	S	TRANS-9: Implement Mitigation Measure TRANS-8.	LTS
TRANS-10: Implementation of the project would not result in inadequate emergency access.	LTS	No mitigation necessary.	NMN
Utilities and Service Systems			
UTIL-1: Sufficient water supplies would be available to serve the proposed Plan from existing entitlements and resources and new or expanded entitlements would not be required.	LTS	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	NMN
UTIL-4: The proposed Plan, in combination with past, present, and reasonably foreseeable projects, would not result in significant cumulative impacts with respect to water supply.	LTS	No mitigation necessary.	NMN

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EXECUTIVE SUMMARY

TABLE 1-3 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation		Significance After Mitigation
		Mitigation Measure	
UTIL-5: The proposed Project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.	LTS	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	NMN
UTIL-12: The proposed Plan would not result in a substantial physical deterioration of a utility facility due to increased use as a result of the project.	LTS	No mitigation necessary.	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	No mitigation necessary.	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	No mitigation necessary.	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.	PS	UTIL-15: To ensure that future development would comply with applicable solid waste regulations, the proposed Plan shall include policies that address <u>achieve</u> the following topics: <ul style="list-style-type: none"> ▪ Substantial <u>Ninety-five percent</u> landfill diversion by 2030, and ultimately zero 	LTS

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TABLE 1-3 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
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	waste. <ul style="list-style-type: none"> ▪ Reduced solid waste generation. ▪ Use of reusable, returnable, recyclable, and repairable goods, <u>through enforcement of the 2016 Plastic Foam Ordinance expansion.</u> ▪ Enhanced recycling and composting programs for all waste generators. 	NMN
UTIL-17: The proposed Plan would not result in a substantial increase in natural gas and electrical service demands that would require the new construction of energy supply facilities and distribution infrastructure or capacity enhancing alterations to existing facilities. However, without the adoption of policies in support of energy efficiency and conservation, the proposed Plan would result in a potentially significant impact, requiring mitigation.	PS	UTIL-17: To ensure that future development would maximize energy efficiency and conservation the proposed Plan shall include policies that address <u>achieve</u> the following topics : <ul style="list-style-type: none"> ▪ Maximized conservation and efficient use of energy. ▪ Continued procurement of carbon-neutral energy. ▪ Investment in cost-effective energy efficiency and energy conservation programs. ▪ Provision of public education programs addressing energy conservation and efficiency. ▪ Use of cost-effective energy conservation measures in City projects and practices. ▪ Adherence to State and federal energy efficiency standards and policies. ▪ Consideration of a transition to a carbon-neutral natural gas supply. 	LTS

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